1 2 3 4 5 6 7 8	INFM AARON D. FORD Attorney General STEVEN SIDHU (Bar. No. 7516) Senior Deputy Attorney General State of Nevada Office of the Attorney General 5175 South Durango Drive Las Vegas, NV 89113 (702) 486-3420 (phone) (702) 486-0460 (fax) ssidhu@ag.nv.gov Attorneys for State of Nevada (I.A. 02/12/2025, 10:00 A.M.)	Electronically Filed 2/7/2025 8:38 AM Steven D. Grierson CLERK OF THE COURT	
	DISTRICT COURT		
9	CLARK COUNTY, NEVADA		
10 11	THE STATE OF NEVADA, Plaintiff,	Case No. C-25-388991-2	
12	vs.	Dept. No. XXVIII	
13 14	CAMEILLE LORIANE FUNCHES,		
15	Defendant.		
10 16			
17	The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada		
18	Attorney General, and STEVEN SIDHU, Senior Deputy Attorney General, informs this		
19	Honorable Court that CAMEILLE LORIANE FUNCHES ("FUNCHES"), the Defendant		
20	above named, has committed the offense of SUBMITTING FALSE CLAIMS: MEDICAID		
21	FRAUD, a category D felony violation of NRS 422.540(1)(a) and NRS 422.540(2)(a), one (1)		
22	count, [NOC 56141] as follows:		
23	<u>COUNT ONE</u> SUBMITTING FALSE CLAIMS: MEDICAID FRAUD		
24	[NRS 422.540(1)(a) and NRS 422.540(2)(a) Felony, Category D]		
25	Defendant FUNCHES through a scheme or continuous course of conduct, with intent		
26	to defraud, knowingly and intentionally made false claims or caused false claims to be made		
27	for payment from Medicaid, in an aggregate amount greater than or equal to \$650:		
28	From on or about January 1, 2020 through December 31, 2020, in Clark County,		

Nevada, Defendant FUNCHES, along with co-defendants Rodshiekka Vantrice Chester ("Chester") and Building Resilience, LLC ("Building Resilience") submitted claims to Medicaid asserting that specific services or quantities of services were provided to the Medicaid recipients by healthcare professionals employed by Building Resilience and requested reimbursement for provision of services. Defendant knew that such services were not actually provided. The Medicaid recipients did not receive the specific services or quantities of services from Building Resilience that Defendant claimed were delivered to the Medicaid recipients.

Defendant FUNCHES did in fact make false claims to Medicaid, resulting in payment from Medicaid aggregating in an amount greater than or equal to \$650.00.

All of which was committed in Clark County and constitutes a category D felony in violation of NRS 422.540.

All of which is contrary to form, force and effect of the statutes in such cases made and provided and against the peace and dignity of the State of Nevada. Furthermore, complainant makes this declaration subject to the penalty of perjury.

DATED this 7th day of February, 2025.

AARON D. FORD Attorney General

By: <u>/s/ Steven Sidhu</u> STEVEN SIDHU (Bar. No. 7516) Senior Deputy Attorney General

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