



1 **INFM**
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8 Attorneys for State of Nevada
(I.A. 9/08/2025, 9:30 A.M.)

9 **DISTRICT COURT**

10 **CLARK COUNTY, STATE OF NEVADA**

11 **THE STATE OF NEVADA,**
12 **Plaintiff,**

Case No. C-25-393818-1

13 vs.

Dept. No. IX

14 **ISAI ANAYA-ESTRADA,**
15 **Defendant.**

16 **INFORMATION**

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 ISAI ANAYA-ESTRADA, the Defendant above named, has
20 committed the offense of **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE**
21 **RECORDS**, a gross misdemeanor violation of NRS 422.570 [NOC 51568], one (1) count, as
22 follows:

23 **COUNT I**

24 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
25 **[NRS 422.570(1) Gross Misdemeanor]**

26 Defendant ISAI ANAYA-ESTRADA (“ANAYA-ESTRADA”), upon submitting a claim
27 for or upon receiving payment for goods or services pursuant to Medicaid, intentionally
28 failed to maintain such records, for at least 5 years after the date on which payment was

1 received, as are necessary to disclose fully the nature of the goods or services for which the
2 claims were submitted or payment received, to wit:

3 From in or about January 2021 through in or about September 2022, Defendant
4 ANAYA-ESTRADA as the owner of Brothers Behavioral Health, LLC, (“Brothers
5 Behavioral”) intentionally failed to maintain accurate documentation, including progress
6 notes and service documentation, concerning the services actually provided by Brothers
7 Behavioral’s healthcare professionals to the Medicaid recipients. Defendant knew these
8 records were used as a basis for claims submitted for reimbursement from Medicaid.
9 Defendant and Brothers Behavioral subsequently obtained payment for such claimed
10 services. Many of Brothers Behavioral’s records were missing or did not note accurate or
11 true dates of services, types of services or persons providing services to the Medicaid
12 recipients.

13 All of which was committed in Clark County and constitutes a gross misdemeanor
14 violation of NRS 422.570(1).

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

18 DATED this 2nd day of September, 2025.

19 AARON D. FORD
20 Attorney General

21 By: /s/ Steven Sidhu
22 STEVEN SIDHU (Bar. No. 7516)
23 Senior Deputy Attorney General
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