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IN THE JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, STATE OF NEVADA

THE STATE OF NEVADA,

Plaintiff,

vs.

DAYANA SANTANDER MORALES,
AGID01295,
and
DC MEDICAL CENTER, LLC,
AGID01296,

Defendants.

JC CASE NO: 26-CR-057245-001

Case No. JC DEPT NO: 11

Dept. No.

AG Case No.: 103722-152.01

CRIMINAL COMPLAINT

The State of Nevada, by and through legal counsel, AARON D. FORD, Nevada Attorney General, and Steven Sidhu, Senior Deputy Attorney General, complains and declares, upon information, belief and/or personal knowledge that:

Defendants DAYANA SANTANDER MORALES ("MORALES") and DC MEDICAL CENTER, LLC ("DC MEDICAL"), a Nevada limited liability company, at the times stated herein, in Las Vegas Township, County of Clark, State of Nevada, each committed the offenses of:

- **SUBMITTING FALSE MEDICAID CLAIMS**, a category D felony violation of NRS 422.540(1)(a) and NRS 422.540(2)(a), one (1) counts [NOC 56141];
- **OBTAINING AND USING THE PERSONAL IDENTIFYING**

1 **INFORMATION OF FIVE OR MORE PERSONS FOR UNLAWFUL**
2 **PURPOSES**, a category B felony violation of NRS 205.463(1) and NRS
3 205.463(3)(b), one (1) count [NOC 54970]; and

- 4 • **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**, a gross
5 misdemeanor violation of NRS 422.570(1), one (1) count [NOC 51568].

6 MORALES, at times stated herein, additionally having committed the offense of:

- 7 • **THEFT IN THE AMOUNT OF \$100,000 OR MORE**, a category B felony
8 violation of NRS 205.0832(1)(c) and NRS 205.0835(2)(e), one (1) count [NOC
9 61963].

10 Defendants committed said offenses against the State of Nevada, Nevada Medicaid
11 Division (hereinafter "Medicaid") in the following manner:

12 From on or about March 21, 2021 forward, DC MEDICAL maintained an agreement
13 with Medicaid to be a provider of services or goods. Under the agreement with Medicaid,
14 DC MEDICAL is considered a Provider Type 20, a Physician M.D. Osteopath D.O. provider.
15 DC MEDICAL'S National Provider Identifier (NPI) is 1962094714. MORALES was
16 identified as the 100% owner and Manager of DC MEDICAL, was authorized to act on DC
17 MEDICAL's behalf, and had the requisite authority and/or responsibility pursuant to NRS
18 422.530.

19 At all times pertinent to these allegations, DC MEDICAL maintained a business
20 and/or practice location at 3468 East Sahara Avenue, Suite 160C, Las Vegas, Nevada
21 89104, which is located in Clark County. At all times pertinent to these allegations, the
22 DC MEDICAL location was where: (1) services were purportedly provided to Medicaid
23 recipients through DC MEDICAL; (2) claims with Medicaid recipient information were
24 submitted to Medicaid for payment for services purportedly provided through DC
25 MEDICAL; (3) records for services purportedly provided to Medicaid recipients through DC
26 MEDICAL were allegedly maintained; and/or (4) MORALES, through the operation of DC
27 MEDICAL, directed the submission of claims to Medicaid for payment.

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From on or about April 1, 2021, through on or about September 19, 2022, Defendants DC MEDICAL and MORALES, through the operation of DC MEDICAL and pursuant to a continuing course of conduct, made and/or caused false claims to be made to Medicaid for payment under the Medicaid ID numbers of several Medicaid recipients for services purportedly provided by various servicing providers on behalf of DC MEDICAL. Through these claims, DC MEDICAL and MORALES represented that various service providers, including Martin Fakiel, Marjorie Landron, and Roberto Ruiz, rendered certain behavioral health services that either the providers denied providing and/or the listed recipients denied receiving. Medicaid recipients under whose identities DC MEDICAL and MORALES submitted claims are exemplified by the following:

Medicaid Recipient	Medicaid ID #	Medicaid Recipient	Medicaid ID #
J.C.	000XXXXX017		
C.C-P.	000XXXXX585	M.M.T.	000XXXXX961
C.C.S.	000XXXXX350	L.P.	000XXXXX921
C.H.	000XXXXX778	R.R.	000XXXXX697
A.H.	000XXXXX345	T.R.	000XXXXX300
J.J.	000XXXXX343	M.R-Q.	000XXXXX039
J.J.	000XXXXX643	S.R-Q.	000XXXXX872
G.M.H.	000XXXXX205	I.T.	000XXXXX682

DC MEDICAL acted through the actions of MORALES, and MORALES intended, at least in part, that her actions benefit DC MEDICAL. As a result of the submission of said claims, DC MEDICAL and/or MORALES obtained or sought to obtain payment from Medicaid.

Pursuant to the Medicaid Services Manual, DC MEDICAL is required to maintain appropriate records to support the claims submitted to Medicaid. In response to the Nevada Attorney General's Office, Medicaid Fraud Control Unit's requests for records DC MEDICAL failed to produce client files and other documentation necessary to fully support claims submitted to Nevada Medicaid for payment.

Records from Wells Fargo Bank list MORALES as the only signer on the account, having full authority to make deposits, withdrawals, and changes to the DC MEDICAL

1 Wells Fargo Bank account ending in #5246. The foregoing bank account was where DC
2 MEDICAL and MORALES requested that Medicaid electronically deposit money.

3 As a result of Defendants' actions regarding submission of false claims to Medicaid,
4 from on or about July 16, 2021, through on or about September 23, 2022, Defendants DC
5 MEDICAL and MORALES received a total of more than \$2,160,000 from Medicaid. Said
6 funds were deposited into the DC MEDICAL Wells Fargo Bank account ending in #5246.

7 Whereas the above-noted allegations being stated against Defendants, the State
8 brings the following charges:

9 **COUNT ONE**

10 **Against MORALES and DC MEDICAL**
11 **SUBMITTING FALSE CLAIMS: MEDICAID FRAUD**
12 **[NRS 422.540(1)(a) and NRS 422.540(2)(a) Felony, Category D]**

13 Defendants MORALES and DC MEDICAL, and each of them, through a scheme or
14 continuous course of conduct, with intent to defraud, knowingly and intentionally made
15 false claims or caused false claims to be made for payment from Medicaid, in an aggregate
16 amount greater than or equal to \$650:

17 From on or about April 1, 2021, through on or about September 19, 2022, in Clark
18 County, Nevada, Defendants MORALES and DC MEDICAL submitted claims to Medicaid
19 asserting that specific services were provided to the Medicaid recipients by Dr. Martin
20 Fakiel, a healthcare professional contracted by DC MEDICAL, and requested
21 reimbursement for provision of services. Defendants knew that such services were not
22 actually provided as Dr. Martin Fakiel was either traveling out of the United States and/or
23 denied providing the services. The Medicaid recipients did not receive the specific services
24 from DC MEDICAL that Defendants claimed were delivered to such recipients.

25 Defendants MORALES and DC MEDICAL did in fact make false claims to Medicaid,
26 resulting in payment from Medicaid in an aggregate amount greater than or equal to \$650.

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

COUNT TWO
Against MORALES and DC MEDICAL
OBTAINING AND USING THE PERSONAL IDENTIFYING INFORMATION OF
FIVE OR MORE PERSONS FOR UNLAWFUL PURPOSES
[NRS 205.463(1) and 205.463(3) Felony, Category B]

Defendants MORALES and DC MEDICAL, and each of them, did knowingly and willfully obtain personal identifying information of five or more persons, and with the intent to commit an unlawful act, used the personal identifying information for an unlawful purpose, to wit:

From on or about April 1, 2021, through on or about September 19, 2022, Defendants MORALES and DC MEDICAL knowingly obtained the names, dates of birth, Medicaid account numbers, Medicare beneficiary numbers, and/or additional personal identifying information of Medicaid recipients, as detailed below, and with the intent to commit an unlawful act, namely Medicaid fraud and/or theft as detailed in Count 1 of this Criminal Complaint, used the personal identifying information of said Medicaid recipients numbers in order to submit false Medicaid claims and to obtain reimbursement from Medicaid for provision of services. Defendants did not receive said services, as Dr. Martin Fakiel was either traveling out of the United States and/or denied providing the services, and Defendants knew that such services were not actually provided. The Medicaid recipients whose personal identifying information Defendants obtained and used for an unlawful purpose, as set forth above, include:

Medicaid Recipient	Medicaid ID #	Medicaid Recipient	Medicaid ID #
J.C.	000XXXXX017		
C.C-P.	000XXXXX585	M.M.T.	000XXXXX961
C.C.S.	000XXXXX350	L.P.	000XXXXX921
C.H.	000XXXXX778	R.R.	000XXXXX697
A.H.	000XXXXX345	T.R.	000XXXXX300
J.J.	000XXXXX343	M.R-Q.	000XXXXX039
J.J.	000XXXXX643	S.R-Q.	000XXXXX872
G.M.H.	000XXXXX205	I.T.	000XXXXX682

All of which was committed in Clark County and constitutes a category B felony violation of NRS 205.463(1) and NRS 205.463(3)(b).

1 **COUNT THREE**
2 **Against DC MEDICAL and MORALES**
3 **INTENTIONAL FAILURE TO MAINTAIN ADEQUATE RECORDS**
4 **[NRS 422.570(1) Gross Misdemeanor]**

5 Defendants MORALES and DC MEDICAL, and each of them, upon submitting a
6 claim for or upon receiving payment for goods or services pursuant to Medicaid,
7 intentionally failed to maintain such records, for at least 5 years after the date on which
8 payment was received, as are necessary to disclose fully the nature of the goods or services
9 for which the claims were submitted or payment received, to wit:

10 From on or about April 1, 2021, through on or about September 19, 2022, Defendants
11 MORALES and DC MEDICAL intentionally failed to maintain accurate documentation,
12 including progress notes and service documentation, concerning the services or quantities
13 of services actually provided by its healthcare professionals to the Medicaid recipients.
14 Defendants knew these records were used as a basis for claims submitted for
15 reimbursement from Medicaid. Defendants subsequently obtained payment for such
16 claimed services. All of Defendants' records relating to services purportedly provided to
17 deceased Medicaid recipients were missing.

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

20 **COUNT FOUR**
21 **Against MORALES**
22 **THEFT**
23 **[NRS 205.0832(1)(c) and 205.0835(2)(e) Felony, Category B]**

24 Defendant MORALES, through a scheme or continuous course of conduct, without
25 lawful authority, knowingly obtained property of another person by a material
26 misrepresentation with the intent to deprive the person of the property, where the
27 aggregate value of said property was \$100,000 or more to wit:

28 From on or about April 1, 2021, through on or about September 19, 2022, Defendant
obtained \$100,000 or more by knowingly submitting false claims to Medicaid for payment
asserting that specific services were provided to Medicaid recipients when those services
were not provided. Said information, namely whether those services were actually

1 provided, was material to Medicaid reimbursing Defendant for said services, and
2 Defendant made such material misrepresentations with the intent to deprive Medicaid of
3 \$100,000 or more by representing that the services were provided by DC MEDICAL's
4 healthcare professionals when, in fact, they were not, as Dr. Martin Fakiel was either
5 traveling out of the United States and/or denied providing the services.

6 All of which was committed in Clark County and constitutes a category B felony
7 violation of NRS 205.0832(1)(c), NRS 205.0834, and NRS 205.0835(2)(e).

8 All of which is contrary to the form, force and effect of statutes in such cases made
9 and provided, and against the peace and dignity of the State of Nevada.

10 The complainant knows that said crimes occurred and that Defendants DAYANA
11 SANTANDER MORALES and DC MEDICAL CENTER, LLC committed the same based
12 on the following: Because the complainant is an attorney in the employ of the Office of the
13 Nevada Attorney General and is in possession of, among other things, the Affidavit of
14 Probable Cause in Support of Criminal Complaint and Summons in Lieu of Arrest, and
15 said affidavit was filed contemporaneously herewith and supports the foregoing to be true

16 The complainant therefore requests that a Summons in Lieu of Arrest be issued for
17 Defendant DAYANA SANTANDER MORALES, in order that said Defendant may be dealt
18 with according to the laws of the State of Nevada

19 The complainant further requests that a Summons in Lieu of Arrest be issued for
20 Defendant DC MEDICAL CENTER, LLC, in order that said Defendant may be dealt with
21 according to the laws of the State of Nevada

22 Said complainant declares under penalty of perjury under the laws of the State of
23 Nevada that the foregoing is true and correct to the best of complainant's knowledge.

24 DATED this 16th day of June, 2026.

25 AARON D. FORD
26 Attorney General

27 By: 
28 STEVEN SIDHU (Bar. No. 7516)
Senior Deputy Attorney General