

CLERK OF THE COURT

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9 **DISTRICT COURT**

10 **CLARK COUNTY, STATE OF NEVADA**

11 STATE OF NEVADA, )

Case No.: C-15-304178-3

12 Plaintiff, )

Dept. No.: VI

13 v. )

14 RICHARD RAYMOND RUPPERT, )  
15 #0623258, SHY SHALOM AZOULAY, )  
16 DANIEL FRANK MASSEY, AND )  
17 CHARLENE P. SIPPPIO, )

Defendant(s). )

18 **INDICTMENT**

19  
20 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY,  
21 DANIEL FRANK MASSEY, and CHARLENE P. SIPPPIO are accused by the Grand Jury of  
22 Clark County, Nevada, of thirty-one counts of INSURANCE FRAUD (Category D Felony –  
23 NRS 686A.2815, 686A.291); ten counts of THEFT OF \$3,500.00 OR MORE (Category B  
24 Felony – NRS 205.0832(1)(c), 205.0835); four counts of THEFT OF \$650.00 OR MORE BUT  
25 LESS THAN \$3,500.00 (Category C Felony – NRS 205.0832(1)(c), 205.0835); fifteen counts  
26 of ATTEMPT THEFT OF \$3,500 OR MORE (Category C Felony – NRS 193.330,  
27 205.0832(1)(c), 205.0835); two counts of ATTEMPT THEFT OF \$650.00 OR MORE BUT  
28 LESS THAN \$3,500.00 (Category D Felony or Gross Misdemeanor – NRS 193.330,

1 205.0832(1)(c), 205.0835); two counts of PRACTICING OR OFFERING TO PRACTICE  
2 NURSING WITHOUT LICENSE (Category D Felony – NRS 632.315(2)); and one count of  
3 RACKETEERING (a Category B Felony – NRS 207.400(1)(c)) committed within Clark County,  
4 Nevada as follows:

5 **COUNT ONE**  
6 **INSURANCE FRAUD**  
7 **(NRS 686A.2815, 686A.291 – Category D Felony)**

8 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
9 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through  
10 March 5, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
11 abet, solicit, or conspire with another person to present or caused to be presented to an  
12 insurer false or misleading information concerning a material fact in support of a claim for  
13 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
14 wit:

- 15 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
16 agent(s), formed and/or operated a business for the purpose of knowingly and  
17 willfully submitting false insurance claims in order to obtain insurance proceeds to  
18 which they were not lawfully entitled;
- 19 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
20 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
21 information of an individual named Shani J. Coleman;
- 22 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
23 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
24 proceeds by, either on her own or by and through her agent(s), billing Coleman's  
25 health insurance company, Meritain Health and/or its affiliate(s), by using medical  
26 codes that corresponded with services that all codefendants knew they and their  
27 agents and employees were not providing to Coleman; and
- 28 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
knowingly and willfully assisted all of his codefendants in obtaining said insurance

1 proceeds by providing his coconspirators with his National Provider Identification  
2 number so that they could use it to bill insurers for services that he (MASSEY) knew  
3 he, his codefendants, and their agents and employees did not provide to their  
4 clients.

5 **COUNT TWO**  
6 **INSURANCE FRAUD**  
7 **(NRS 686A.2815, 686A.291 – Category D Felony)**

8 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
9 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 24, 2011 through July 2,  
10 2012, within Clark County, Nevada, did knowingly and willfully, present or assist, abet, solicit,  
11 or conspire with another person to present or caused to be presented to an insurer false or  
12 misleading information concerning a material fact in support of a claim for benefits made  
13 under a policy of insurance issued pursuant to the Nevada Insurance Act, to wit:

- 14 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
15 agent(s), formed and/or operated a business for the purpose of knowingly and  
16 willfully submitting false insurance claims in order to obtain insurance proceeds to  
17 which they were not lawfully entitled;
- 18 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
19 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
20 information of an individual named Michael D. Habighorst;
- 21 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
22 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
23 proceeds by, either on her own or by and through her agent(s), billing Habighorst  
24 health insurance company, Meritain Health and/or its affiliate(s), by using medical  
25 codes that corresponded with services that all codefendants knew they and their  
26 agents and employees were not providing to Habighorst; and
- 27 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
28 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
proceeds by providing his coconspirators with his National Provider Identification

1 number so that they could use it to bill insurers for services that he (MASSEY) knew  
2 he, his codefendants, and their agents and employees did not provide to their  
3 clients.

4  
5 **COUNT THREE**  
6 **INSURANCE FRAUD**  
7 **(NRS 686A.2815, 686A.291 – Category D Felony)**

8 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
9 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about January 7, 2012 through June 5,  
10 2012 through March 5, 2012, within Clark County, Nevada, did knowingly and willfully, present  
11 or assist, abet, solicit, or conspire with another person to present or caused to be presented to  
12 an insurer false or misleading information concerning a material fact in support of a claim for  
13 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
14 wit:

- 15 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
16 agent(s), formed and/or operated a business for the purpose of knowingly and  
17 willfully submitting false insurance claims in order to obtain insurance proceeds to  
18 which they were not lawfully entitled;
- 19 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
20 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
21 information of an individual named Patricia Lavendar;
- 22 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
23 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
24 proceeds by, either on her own or by and through her agent(s), billing Lavendar's  
25 health insurance company, Sierra Health and Life and/or its affiliate(s), by using  
26 medical codes that corresponded with services that all codefendants knew they and  
27 their agents and employees were not providing to Coleman; and
- 28 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
knowingly and willfully assisted all of his codefendants in obtaining said insurance

1 proceeds by providing his coconspirators with his National Provider Identification  
2 number so that they could use it to bill insurers for services that he (MASSEY) knew  
3 he, his codefendants, and their agents and employees did not provide to their  
4 clients.

5  
6 **COUNT FOUR**  
7 **INSURANCE FRAUD**  
8 **(NRS 686A.2815, 686A.291 – Category D Felony)**

9 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
10 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about September 29, 2011 through May  
11 6, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist, abet,  
12 solicit, or conspire with another person to present or caused to be presented to an insurer  
13 false or misleading information concerning a material fact in support of a claim for benefits  
14 made under a policy of insurance issued pursuant to the Nevada Insurance Act, to wit:

- 15 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
16 agent(s), formed and/or operated a business for the purpose of knowingly and  
17 willfully submitting false insurance claims in order to obtain insurance proceeds to  
18 which they were not lawfully entitled;
- 19 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
20 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
21 information of an individual named Charles G. Ramirez;
- 22 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
23 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
24 proceeds by, either on her own or by and through her agent(s), billing Ramirez's  
25 health insurance company, Sierra Health and Life and/or its affiliate(s), by using  
26 medical codes that corresponded with services that all codefendants knew they and  
27 their agents and employees were not providing to Ramirez; and
- 28 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
knowingly and willfully assisted all of his codefendants in obtaining said insurance

1 proceeds by providing his coconspirators with his National Provider Identification  
2 number so that they could use it to bill insurers for services that he (MASSEY) knew  
3 he, his codefendants, and their agents and employees did not provide to their  
4 clients.

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6 **COUNT FIVE**  
7 **INSURANCE FRAUD**  
8 **(NRS 686A.2815, 686A.291 – Category D Felony)**

9 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
10 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 25, 2011 through June 5,  
11 2012, within Clark County, Nevada, did knowingly and willfully, present or assist, abet, solicit,  
12 or conspire with another person to present or caused to be presented to an insurer false or  
13 misleading information concerning a material fact in support of a claim for benefits made  
14 under a policy of insurance issued pursuant to the Nevada Insurance Act, to wit:

- 15 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
16 agent(s), formed and/or operated a business for the purpose of knowingly and  
17 willfully submitting false insurance claims in order to obtain insurance proceeds to  
18 which they were not lawfully entitled;
- 19 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
20 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
21 information of an individual named Terri L. Strahan;
- 22 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
23 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
24 proceeds by, either on her own or by and through her agent(s), billing Strahan's  
25 health insurance company, Sierra Health and Life and/or its affiliate(s), by using  
26 medical codes that corresponded with services that all codefendants knew they and  
27 their agents and employees were not providing to Strahan; and
- 28 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
knowingly and willfully assisted all of his codefendants in obtaining said insurance

1 proceeds by providing his coconspirators with his National Provider Identification  
2 number so that they could use it to bill insurers for services that he (MASSEY) knew  
3 he, his codefendants, and their agents and employees did not provide to their  
4 clients.

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6 **COUNT SIX**  
7 **INSURANCE FRAUD**  
8 **(NRS 686A.2815, 686A.291 – Category D Felony)**

9 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
10 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about November 3, 2011 through May  
11 28, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist, abet,  
12 solicit, or conspire with another person to present or caused to be presented to an insurer  
13 false or misleading information concerning a material fact in support of a claim for benefits  
14 made under a policy of insurance issued pursuant to the Nevada Insurance Act, to wit:

- 15 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
16 agent(s), formed and/or operated a business for the purpose of knowingly and  
17 willfully submitting false insurance claims in order to obtain insurance proceeds to  
18 which they were not lawfully entitled;
- 19 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
20 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
21 information of an individual named Carol W. Sullivan;
- 22 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
23 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
24 proceeds by, either on her own or by and through her agent(s), billing Sullivan's  
25 health insurance company, Sierra Health and Life and/or its affiliate(s), by using  
26 medical codes that corresponded with services that all codefendants knew they and  
27 their agents and employees were not providing to Sullivan; and
- 28 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
knowingly and willfully assisted all of his codefendants in obtaining said insurance

1 proceeds by providing his coconspirators with his National Provider Identification  
2 number so that they could use it to bill insurers for services that he (MASSEY) knew  
3 he, his codefendants, and their agents and employees did not provide to their  
4 clients.

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6 **COUNT SEVEN**  
7 **INSURANCE FRAUD**  
8 **(NRS 686A.2815, 686A.291 – Category D Felony)**

9 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
10 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 26, 2011 through May  
11 22, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist, abet,  
12 solicit, or conspire with another person to present or caused to be presented to an insurer  
13 false or misleading information concerning a material fact in support of a claim for benefits  
made under a policy of insurance issued pursuant to the Nevada Insurance Act, to wit:

- 14 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
15 agent(s), formed and/or operated a business for the purpose of knowingly and  
16 willfully submitting false insurance claims in order to obtain insurance proceeds to  
17 which they were not lawfully entitled;
- 18 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
19 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
20 information of an individual named Cindy B. Sullivan;
- 21 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
22 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
23 proceeds by, either on her own or by and through her agent(s), billing Sullivan's  
24 health insurance company, Sierra Health and Life and/or its affiliate(s), by using  
25 medical codes that corresponded with services that all codefendants knew they and  
26 their agents and employees were not providing to Sullivan; and
- 27 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
28 knowingly and willfully assisted all of his codefendants in obtaining said insurance

1 proceeds by providing his coconspirators with his National Provider Identification  
2 number so that they could use it to bill insurers for services that he (MASSEY) knew  
3 he, his codefendants, and their agents and employees did not provide to their  
4 clients.

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6 **COUNT EIGHT**  
7 **INSURANCE FRAUD**  
8 **(NRS 686A.2815, 686A.291 – Category D Felony)**

9 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
10 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about September 12, 2011 through  
11 February 14, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
12 abet, solicit, or conspire with another person to present or caused to be presented to an  
13 insurer false or misleading information concerning a material fact in support of a claim for  
14 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
15 wit:

- 16 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
17 agent(s), formed and/or operated a business for the purpose of knowingly and  
18 willfully submitting false insurance claims in order to obtain insurance proceeds to  
19 which they were not lawfully entitled;
- 20 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
21 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
22 information of an individual named Shannon Blackerby;
- 23 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
24 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
25 proceeds by, either on her own or by and through her agent(s), billing Blackerby's  
26 health insurance company, Sierra Health and Life and/or its affiliate(s), by using  
27 medical codes that corresponded with services that all codefendants knew they and  
28 their agents and employees were not providing to Blackerby; and

- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in obtaining said insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill insurers for services that he (MASSEY) knew he, his codefendants, and their agents and employees did not provide to their clients.

**COUNT NINE**  
**INSURANCE FRAUD**  
**(NRS 686A.2815, 686A.291 – Category D Felony)**

Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 28, 2011 through February 16, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist, abet, solicit, or conspire with another person to present or caused to be presented to an insurer false or misleading information concerning a material fact in support of a claim for benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to wit:

- Defendants RUPPERT and AZOULAY, either on their own or by and through their agent(s), formed and/or operated a business for the purpose of knowingly and willfully submitting false insurance claims in order to obtain insurance proceeds to which they were not lawfully entitled;
- RUPPERT and AZOULAY, either on their own or by and through their agent(s) acting at the direction of RUPPERT and AZOULAY, obtained the health insurance information of an individual named Joann Crolli;
- At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO knowingly and willfully assisted all of her codefendants in obtaining said insurance proceeds by, either on her own or by and through her agent(s), billing Crolli's health insurance company, Sierra Health and Life and/or its affiliate(s), by using medical

1 codes that corresponded with services that all codefendants knew they and their  
2 agents and employees were not providing to Crolli; and

- 3 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
4 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
5 proceeds by providing his coconspirators with his National Provider Identification  
6 number so that they could use it to bill insurers for services that he (MASSEY) knew  
7 he, his codefendants, and their agents and employees did not provide to their  
8 clients.

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10 **COUNT TEN**  
11 **INSURANCE FRAUD**  
12 **(NRS 686A.2815, 686A.291 – Category D Felony)**

13 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
14 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about October 24, 2011 through  
15 February 16, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
16 abet, solicit, or conspire with another person to present or caused to be presented to an  
17 insurer false or misleading information concerning a material fact in support of a claim for  
18 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
19 wit:

- 20 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
21 agent(s), formed and/or operated a business for the purpose of knowingly and  
22 willfully submitting false insurance claims in order to obtain insurance proceeds to  
23 which they were not lawfully entitled;
- 24 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
25 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
26 information of an individual named Dora Herrman;
- 27 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
28 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
proceeds by, either on her own or by and through her agent(s), billing Hermann's

1 health insurance company, Sierra Health and Life and/or its affiliate(s), by using  
2 medical codes that corresponded with services that all codefendants knew they and  
3 their agents and employees were not providing to Herrman; and

- 4 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
5 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
6 proceeds by providing his coconspirators with his National Provider Identification  
7 number so that they could use it to bill insurers for services that he (MASSEY) knew  
8 he, his codefendants, and their agents and employees did not provide to their  
9 clients.

10  
11 **COUNT ELEVEN**  
12 **INSURANCE FRAUD**  
13 **(NRS 686A.2815, 686A.291 – Category D Felony)**

14 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
15 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 24, 2011 through  
16 February 16, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
17 abet, solicit, or conspire with another person to present or caused to be presented to an  
18 insurer false or misleading information concerning a material fact in support of a claim for  
19 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
20 wit:

- 21 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
22 agent(s), formed and/or operated a business for the purpose of knowingly and  
23 willfully submitting false insurance claims in order to obtain insurance proceeds to  
24 which they were not lawfully entitled;
- 25 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
26 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
27 information of an individual named David Johnson;
- 28 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
knowingly and willfully assisted all of her codefendants in obtaining said insurance

1 proceeds by, either on her own or by and through her agent(s), billing Johnson's  
2 health insurance company, Sierra Health and Life and/or its affiliate(s), by using  
3 medical codes that corresponded with services that all codefendants knew they and  
4 their agents and employees were not providing to Johnson; and

- 5 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
6 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
7 proceeds by providing his coconspirators with his National Provider Identification  
8 number so that they could use it to bill insurers for services that he (MASSEY) knew  
9 he, his codefendants, and their agents and employees did not provide to their  
10 clients.

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12 **COUNT TWELVE**  
13 **INSURANCE FRAUD**  
14 **(NRS 686A.2815, 686A.291 – Category D Felony)**

15 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
16 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about October 31, 2011 through  
17 February 16, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
18 abet, solicit, or conspire with another person to present or caused to be presented to an  
19 insurer false or misleading information concerning a material fact in support of a claim for  
20 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
21 wit:

- 22 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
23 agent(s), formed and/or operated a business for the purpose of knowingly and  
24 willfully submitting false insurance claims in order to obtain insurance proceeds to  
25 which they were not lawfully entitled;
- 26 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
27 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
28 information of an individual named Lisa Johnson;

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- At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO knowingly and willfully assisted all of her codefendants in obtaining said insurance proceeds by, either on her own or by and through her agent(s), billing Johnson's health insurance company, Sierra Health and Life and/or its affiliate(s), by using medical codes that corresponded with services that all codefendants knew they and their agents and employees were not providing to Johnson; and
  - At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in obtaining said insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill insurers for services that he (MASSEY) knew he, his codefendants, and their agents and employees did not provide to their clients.

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**COUNT THIRTEEN**  
**INSURANCE FRAUD**  
**(NRS 686A.2815, 686A.291 – Category D Felony)**

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Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through February 16, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist, abet, solicit, or conspire with another person to present or caused to be presented to an insurer false or misleading information concerning a material fact in support of a claim for benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to wit:

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- Defendants RUPPERT and AZOULAY, either on their own or by and through their agent(s), formed and/or operated a business for the purpose of knowingly and willfully submitting false insurance claims in order to obtain insurance proceeds to which they were not lawfully entitled;

- 1 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
2 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
3 information of an individual named Beatriz Kremer;
- 4 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
5 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
6 proceeds by, either on her own or by and through her agent(s), billing Kremer's  
7 health insurance company, Sierra Health and Life and/or its affiliate(s), by using  
8 medical codes that corresponded with services that all codefendants knew they and  
9 their agents and employees were not providing to Kremer; and
- 10 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
11 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
12 proceeds by providing his coconspirators with his National Provider Identification  
13 number so that they could use it to bill insurers for services that he (MASSEY) knew  
14 he, his codefendants, and their agents and employees did not provide to their  
15 clients.

16  
17 **COUNT FOURTEEN**  
**INSURANCE FRAUD**

18 **(NRS 686A.2815, 686A.291 – Category D Felony)**

19 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
20 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about October 24, 2011 through  
21 February 16, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
22 abet, solicit, or conspire with another person to present or caused to be presented to an  
23 insurer false or misleading information concerning a material fact in support of a claim for  
24 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
25 wit:

- 26 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
27 agent(s), formed and/or operated a business for the purpose of knowingly and  
28

1 willfully submitting false insurance claims in order to obtain insurance proceeds to  
2 which they were not lawfully entitled;

- 3 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
4 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
5 information of an individual named Kelli Marek;
- 6 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
7 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
8 proceeds by, either on her own or by and through her agent(s), billing Marek's  
9 health insurance company, Sierra Health and Life and/or its affiliate(s), by using  
10 medical codes that corresponded with services that all codefendants knew they and  
11 their agents and employees were not providing to Marek; and
- 12 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
13 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
14 proceeds by providing his coconspirators with his National Provider Identification  
15 number so that they could use it to bill insurers for services that he (MASSEY) knew  
16 he, his codefendants, and their agents and employees did not provide to their  
17 clients.

18  
19 **COUNT FIFTEEN**  
20 **INSURANCE FRAUD**  
**(NRS 686A.2815, 686A.291 – Category D Felony)**

21 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
22 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through  
23 December 8, 2011, within Clark County, Nevada, did knowingly and willfully, present or assist,  
24 abet, solicit, or conspire with another person to present or caused to be presented to an  
25 insurer false or misleading information concerning a material fact in support of a claim for  
26 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
27 wit:

- 1 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
2 agent(s), formed and/or operated a business for the purpose of knowingly and  
3 willfully submitting false insurance claims in order to obtain insurance proceeds to  
4 which they were not lawfully entitled;
- 5 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
6 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
7 information of an individual named Michael Morris;
- 8 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
9 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
10 proceeds by, either on her own or by and through her agent(s), billing Morris' health  
11 insurance company, Sierra Health and Life and/or its affiliate(s), by using medical  
12 codes that corresponded with services that all codefendants knew they and their  
13 agents and employees were not providing to Morris; and
- 14 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
15 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
16 proceeds by providing his coconspirators with his National Provider Identification  
17 number so that they could use it to bill insurers for services that he (MASSEY) knew  
18 he, his codefendants, and their agents and employees did not provide to their  
19 clients.

20  
21 **COUNT SIXTEEN**  
**INSURANCE FRAUD**

22 **(NRS 686A.2815, 686A.291 – Category D Felony)**

23 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
24 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through  
25 February 16, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
26 abet, solicit, or conspire with another person to present or caused to be presented to an  
27 insurer false or misleading information concerning a material fact in support of a claim for  
28

1 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
2 wit:

- 3 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
4 agent(s), formed and/or operated a business for the purpose of knowingly and  
5 willfully submitting false insurance claims in order to obtain insurance proceeds to  
6 which they were not lawfully entitled;
- 7 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
8 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
9 information of an individual named Brian Saffle;
- 10 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
11 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
12 proceeds by, either on her own or by and through her agent(s), billing Saffle's health  
13 insurance company, Sierra Health and Life and/or its affiliate(s), by using medical  
14 codes that corresponded with services that all codefendants knew they and their  
15 agents and employees were not providing to Saffle; and
- 16 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
17 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
18 proceeds by providing his coconspirators with his National Provider Identification  
19 number so that they could use it to bill insurers for services that he (MASSEY) knew  
20 he, his codefendants, and their agents and employees did not provide to their  
21 clients.

22  
23 **COUNT SEVENTEEN**  
24 **INSURANCE FRAUD**  
**(NRS 686A.2815, 686A.291 – Category D Felony)**

25 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
26 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about September 12, 2011 through  
27 February 16, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
28 abet, solicit, or conspire with another person to present or caused to be presented to an

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1 insurer false or misleading information concerning a material fact in support of a claim for  
2 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
3 wit:

- 4 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
5 agent(s), formed and/or operated a business for the purpose of knowingly and  
6 willfully submitting false insurance claims in order to obtain insurance proceeds to  
7 which they were not lawfully entitled;
- 8 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
9 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
10 information of an individual named Kendra Saffle;
- 11 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
12 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
13 proceeds by, either on her own or by and through her agent(s), billing Saffle's health  
14 insurance company, Sierra Health and Life and/or its affiliate(s), by using medical  
15 codes that corresponded with services that all codefendants knew they and their  
16 agents and employees were not providing to Saffle; and
- 17 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
18 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
19 proceeds by providing his coconspirators with his National Provider Identification  
20 number so that they could use it to bill insurers for services that he (MASSEY) knew  
21 he, his codefendants, and their agents and employees did not provide to their  
22 clients.

23  
24 **COUNT EIGHTEEN**  
25 **INSURANCE FRAUD**  
**(NRS 686A.2815, 686A.291 – Category D Felony)**

26 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
27 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 24, 2011 through  
28 February 16, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,

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1 abet, solicit, or conspire with another person to present or caused to be presented to an  
2 insurer false or misleading information concerning a material fact in support of a claim for  
3 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
4 wit:

- 5 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
6 agent(s), formed and/or operated a business for the purpose of knowingly and  
7 willfully submitting false insurance claims in order to obtain insurance proceeds to  
8 which they were not lawfully entitled;
- 9 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
10 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
11 information of an individual named Denise Whipple;
- 12 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
13 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
14 proceeds by, either on her own or by and through her agent(s), billing Whipple's  
15 health insurance company, Sierra Health and Life and/or its affiliate(s), by using  
16 medical codes that corresponded with services that all codefendants knew they and  
17 their agents and employees were not providing to Whipple; and
- 18 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
19 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
20 proceeds by providing his coconspirators with his National Provider Identification  
21 number so that they could use it to bill insurers for services that he (MASSEY) knew  
22 he, his codefendants, and their agents and employees did not provide to their  
23 clients.

24  
25 **COUNT NINETEEN**  
**INSURANCE FRAUD**

26 (NRS 686A.2815, 686A.291 – Category D Felony)

27 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
28 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 24, 2011 through

1 February 16, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
2 abet, solicit, or conspire with another person to present or caused to be presented to an  
3 insurer false or misleading information concerning a material fact in support of a claim for  
4 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
5 wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Timothy Whipple;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Whipple's  
16 health insurance company, Sierra Health and Life and/or its affiliate(s), by using  
17 medical codes that corresponded with services that all codefendants knew they and  
18 their agents and employees were not providing to Whipple; and
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients.

25 **COUNT TWENTY**  
26 **INSURANCE FRAUD**

(NRS 686A.2815, 686A.291 – Category D Felony)

27 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
28 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about January 11, 2012 through April

1 13, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist, abet,  
2 solicit, or conspire with another person to present or caused to be presented to an insurer  
3 false or misleading information concerning a material fact in support of a claim for benefits  
4 made under a policy of insurance issued pursuant to the Nevada Insurance Act, to wit:

- 5 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
6 agent(s), formed and/or operated a business for the purpose of knowingly and  
7 willfully submitting false insurance claims in order to obtain insurance proceeds to  
8 which they were not lawfully entitled;
- 9 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
10 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
11 information of an individual named Terry Coffing;
- 12 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
13 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
14 proceeds by, either on her own or by and through her agent(s), billing Coffing's  
15 health insurance company, Aetna and/or its affiliate(s), by using medical codes that  
16 corresponded with services that all codefendants knew they and their agents and  
17 employees were not providing to Coffing; and
- 18 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
19 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
20 proceeds by providing his coconspirators with his National Provider Identification  
21 number so that they could use it to bill insurers for services that he (MASSEY) knew  
22 he, his codefendants, and their agents and employees did not provide to their  
23 clients.

24  
25 **COUNT TWENTY-ONE**  
26 **INSURANCE FRAUD**  
**(NRS 686A.2815, 686A.291 – Category D Felony)**

27 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
28 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through

1 February 8, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
2 abet, solicit, or conspire with another person to present or caused to be presented to an  
3 insurer false or misleading information concerning a material fact in support of a claim for  
4 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
5 wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Amy Dahlstrom;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Dahlstrom's  
16 health insurance company, Aetna and/or its affiliate(s), by using medical codes that  
17 corresponded with services that all codefendants knew they and their agents and  
18 employees were not providing to Dahlstrom; and
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients.

25 **COUNT TWENTY- TWO**  
26 **INSURANCE FRAUD**

27 **(NRS 686A.2815, 686A.291 – Category D Felony)**

28 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through

1 January 2, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
2 abet, solicit, or conspire with another person to present or caused to be presented to an  
3 insurer false or misleading information concerning a material fact in support of a claim for  
4 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
5 wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Monica Fleming;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Fleming's  
16 health insurance company, Aetna and/or its affiliate(s), by using medical codes that  
17 corresponded with services that all codefendants knew they and their agents and  
18 employees were not providing to Fleming; and
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients.

25 **COUNT TWENTY-THREE**  
26 **INSURANCE FRAUD**  
**(NRS 686A.2815, 686A.291 – Category D Felony)**

27 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
28 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about September 12, 2011 through

1 December 14, 2012, within Clark County, Nevada, did knowingly and willfully, present or  
2 assist, abet, solicit, or conspire with another person to present or caused to be presented to  
3 an insurer false or misleading information concerning a material fact in support of a claim for  
4 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
5 wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Colin Mcrae;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Mcrae's  
16 health insurance company, Aetna and/or its affiliate(s), by using medical codes that  
17 corresponded with services that all codefendants knew they and their agents and  
18 employees were not providing to Mcrae; and
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients.

25 **COUNT TWENTY-FOUR**  
26 **INSURANCE FRAUD**

26 **(NRS 686A.2815, 686A.291 – Category D Felony)**

27 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
28 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about September 12, 2011 through

1 February 20, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
2 abet, solicit, or conspire with another person to present or caused to be presented to an  
3 insurer false or misleading information concerning a material fact in support of a claim for  
4 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
5 wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Jennifer Plinio;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Plinio's health  
16 insurance company, Aetna and/or its affiliate(s), by using medical codes that  
17 corresponded with services that all codefendants knew they and their agents and  
18 employees were not providing to Plinio; and
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients.

25 **COUNT TWENTY-FIVE**  
26 **INSURANCE FRAUD**

26 (NRS 686A.2815, 686A.291 – Category D Felony)

27 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
28 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about September 12, 2011 through

1 February 6, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
2 abet, solicit, or conspire with another person to present or caused to be presented to an  
3 insurer false or misleading information concerning a material fact in support of a claim for  
4 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
5 wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Brenna Schrader;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Schrader's  
16 health insurance company, Aetna and/or its affiliate(s), by using medical codes that  
17 corresponded with services that all codefendants knew they and their agents and  
18 employees were not providing to Schrader; and
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients.

25 **COUNT TWENTY-SIX**  
26 **INSURANCE FRAUD**

26 (NRS 686A.2815, 686A.291 – Category D Felony)

27 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
28 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through

1 February 1, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
2 abet, solicit, or conspire with another person to present or caused to be presented to an  
3 insurer false or misleading information concerning a material fact in support of a claim for  
4 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
5 wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Kimberly Sexton;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Sexton's  
16 health insurance company, Aetna and/or its affiliate(s), by using medical codes that  
17 corresponded with services that all codefendants knew they and their agents and  
18 employees were not providing to Sexton; and
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients.

25 **COUNT TWENTY-SEVEN**  
26 **INSURANCE FRAUD**  
**(NRS 686A.2815, 686A.291 – Category D Felony)**

27 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
28 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through

1 February 3, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
2 abet, solicit, or conspire with another person to present or caused to be presented to an  
3 insurer false or misleading information concerning a material fact in support of a claim for  
4 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
5 wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Megan Sheffield;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Sheffield  
16 health insurance company, Aetna and/or its affiliate(s), by using medical codes that  
17 corresponded with services that all codefendants knew they and their agents and  
18 employees were not providing to Scheffield; and
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients.

25 **COUNT TWENTY-EIGHT**  
26 **INSURANCE FRAUD**

(NRS 686A.2815, 686A.291 – Category D Felony)

27 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
28 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about September 12, 2011 through

1 November 23, 2011, within Clark County, Nevada, did knowingly and willfully, present or  
2 assist, abet, solicit, or conspire with another person to present or caused to be presented to  
3 an insurer false or misleading information concerning a material fact in support of a claim for  
4 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
5 wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Nicole Gervasi;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Gervasi's  
16 health insurance company, Golden Rule and/or its affiliate(s), by using medical  
17 codes that corresponded with services that all codefendants knew they and their  
18 agents and employees were not providing to Gervasi; and
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients.

25 **COUNT TWENTY-NINE**  
26 **INSURANCE FRAUD**

27 **(NRS 686A.2815, 686A.291 – Category D Felony)**

28 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through April

1 3, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist, abet,  
2 solicit, or conspire with another person to present or caused to be presented to an insurer  
3 false or misleading information concerning a material fact in support of a claim for benefits  
4 made under a policy of insurance issued pursuant to the Nevada Insurance Act, to wit:

- 5 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
6 agent(s), formed and/or operated a business for the purpose of knowingly and  
7 willfully submitting false insurance claims in order to obtain insurance proceeds to  
8 which they were not lawfully entitled;
- 9 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
10 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
11 information of an individual named Dannine Budinger;
- 12 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
13 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
14 proceeds by, either on her own or by and through her agent(s), billing Budinger's  
15 health insurance company, Cigna and/or its affiliate(s), by using medical codes that  
16 corresponded with services that all codefendants knew they and their agents and  
17 employees were not providing to Budinger; and
- 18 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
19 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
20 proceeds by providing his coconspirators with his National Provider Identification  
21 number so that they could use it to bill insurers for services that he (MASSEY) knew  
22 he, his codefendants, and their agents and employees did not provide to their  
23 clients.

24  
25 **COUNT THIRTY**  
**INSURANCE FRAUD**

26 **(NRS 686A.2815, 686A.291 – Category D Felony)**

27 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
28 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about September 16, 2011 through

1 February 11, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
2 abet, solicit, or conspire with another person to present or caused to be presented to an  
3 insurer false or misleading information concerning a material fact in support of a claim for  
4 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
5 wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Holly Mcrae;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Mcrae's  
16 health insurance company, Cigna and/or its affiliate(s), by using medical codes that  
17 corresponded with services that all codefendants knew they and their agents and  
18 employees were not providing to Mcrae; and
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients.

25 **COUNT THIRTY-ONE**  
**INSURANCE FRAUD**

26 **(NRS 686A.2815, 686A.291 – Category D Felony)**

27 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
28 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through

1 February 20, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,  
2 abet, solicit, or conspire with another person to present or caused to be presented to an  
3 insurer false or misleading information concerning a material fact in support of a claim for  
4 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to  
5 wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Rachel Zurcher;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Zurcher's  
16 health insurance company, Cigna and/or its affiliate(s), by using medical codes that  
17 corresponded with services that all codefendants knew they and their agents and  
18 employees were not providing to Zurcher; and
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients.

25 **COUNT THIRTY-TWO**  
26 **THEFT**  
**(NRS 205.0832(1)(c) – Category B Felony)**

27 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
28 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through

1 March 5, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained, or  
2 assisted, abetted, solicited, or conspired with another person to obtain, real, personal or  
3 intangible property or the services of another person by a material misrepresentation with  
4 intent to deprive that person of the property or service, with the value of said property being  
5 \$3,500.00 or more, to wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Shani J. Coleman;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Coleman's  
16 health insurance company, Meritain Health and/or its affiliate(s), by using medical  
17 codes that corresponded with services that all codefendants knew they and their  
18 agents and employees were not providing to Coleman;
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients;
- 25 • As a result, Meritain Health and/or its affiliate(s) paid the defendants and/or their  
26 agent(s) \$3,500.00 or more for insurance claims made for services that were never  
27 provided to Coleman.

**COUNT THIRTY-THREE**  
**THEFT**

**(NRS 205.0832(1)(c) – Category B Felony)**

Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about October 24, 2011 through July 2, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained, or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or intangible property or the services of another person by a material misrepresentation with intent to deprive that person of the property or service, with the value of said property being \$3,500.00 or more, to wit:

- Defendants RUPPERT and AZOULAY, either on their own or by and through their agent(s), formed and/or operated a business for the purpose of knowingly and willfully submitting false insurance claims in order to obtain insurance proceeds to which they were not lawfully entitled;
- RUPPERT and AZOULAY, either on their own or by and through their agent(s) acting at the direction of RUPPERT and AZOULAY, obtained the health insurance information of an individual named Michael D. Habighorst;
- At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO knowingly and willfully assisted all of her codefendants in obtaining said insurance proceeds by, either on her own or by and through her agent(s), billing Habighorst health insurance company, Meritain Health and/or its affiliate(s), by using medical codes that corresponded with services that all codefendants knew they and their agents and employees were not providing to Habighorst;
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in obtaining said insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill insurers for services that he (MASSEY) knew he, his codefendants, and their agents and employees did not provide to their clients;

- 1 • As a result, Meritain Health and/or its affiliate(s) paid the defendants and/or their  
2 agent(s) \$3,500.00 or more for insurance claims made for services that were never  
3 provided to Habighorst.

4  
5 **COUNT THIRTY-FOUR**  
6 **ATTEMPT – THEFT**  
7 **(NRS 193.330, 205.0832(1)(c) – Category C Felony)**

8 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
9 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about January 7, 2012 through June 5,  
10 2012 through March 5, 2012, within Clark County, Nevada, without lawful authority, knowingly  
11 attempted to obtain, or attempted to assist, abet, solicit, or conspire with another person to  
12 obtain, real, personal or intangible property or the services of another person by a material  
13 misrepresentation with intent to deprive that person of the property or service, with the value  
14 of said property being \$3,500.00 or more, to wit:

- 15 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
16 agent(s), formed and/or operated a business for the purpose of knowingly and  
17 willfully submitting false insurance claims in an attempt to obtain insurance  
18 proceeds to which they were not lawfully entitled;
- 19 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
20 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
21 information of an individual named Patricia Lavendar;
- 22 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
23 knowingly and willfully assisted all of her codefendants in an attempt to obtain said  
24 insurance proceeds by, either on her own or by and through her agent(s), billing  
25 Lavendar's health insurance company, Sierra Health and Life and/or its affiliate(s),  
26 by using medical codes that corresponded with services that all codefendants knew  
27 they and their agents and employees were not providing to Coleman;
- 28 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
29 knowingly and willfully assisted all of his codefendants in attempting to obtain said

1 insurance proceeds by providing his coconspirators with his National Provider  
2 Identification number so that they could use it to bill insurers for services that he  
3 (MASSEY) knew he, his codefendants, and their agents and employees did not  
4 provide to their clients;

- 5 • Sierra Health and Life and/or its affiliate(s) did not pay the defendants and/or their  
6 agent(s) for the insurance claims in the amount of \$3,500.00 or more made for  
7 services that were never provided to Lavendar.

8  
9 **COUNT THIRTY-FIVE**

10 **ATTEMPT – THEFT**

11 **(NRS 193.330, 205.0832(1)(c) – Category D Felony or Gross Misdemeanor)**

12 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
13 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 29, 2011 through May  
14 6, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted to obtain,  
15 or assisted, abetted, solicited, or conspired with another person in an attempt to obtain, real,  
16 personal or intangible property or the services of another person by a material  
17 misrepresentation with intent to deprive that person of the property or service, with the value  
18 of said property being \$650 or more, but less than \$3,500.00, to wit:

- 18 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
19 agent(s), formed and/or operated a business for the purpose of knowingly and  
20 willfully submitting false insurance claims in an attempt to obtain insurance  
21 proceeds to which they were not lawfully entitled;
- 22 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
23 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
24 information of an individual named Charles G. Ramirez;
- 25 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
26 knowingly and willfully assisted all of her codefendants in an attempt to obtain said  
27 insurance proceeds by, either on her own or by and through her agent(s), billing  
28 Ramirez's health insurance company, Sierra Health and Life and/or its affiliate(s),

1 by using medical codes that corresponded with services that all codefendants knew  
2 they and their agents and employees were not providing to Ramirez;

- 3 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
4 knowingly and willfully assisted all of his codefendants in an attempt to obtain said  
5 insurance proceeds by providing his coconspirators with his National Provider  
6 Identification number so that they could use it to bill insurers for services that he  
7 (MASSEY) knew he, his codefendants, and their agents and employees did not  
8 provide to their clients;
- 9 • Sierra Health and Life and/or its affiliate(s) did not pay the defendants and/or their  
10 agent(s) for the insurance claims in the amount of \$650.00 or more, but less than  
11 \$3,500.00 made for services that were never provided to Ramirez.

12  
13 **COUNT THIRTY-SIX**  
14 **ATTEMPT - THEFT**  
15 **(NRS 193.330, 205.0832(1)(c) - Category C Felony)**

16 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
17 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 25, 2011 through June 5,  
18 2012, within Clark County, Nevada, without lawful authority, knowingly attempted to obtain, or  
19 assisted, abetted, solicited, or conspired with another person in an attempt to obtain, real,  
20 personal or intangible property or the services of another person by a material  
21 misrepresentation with intent to deprive that person of the property or service, with the value  
22 of said property being \$3,500.00 or more, to wit:

- 22 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
23 agent(s), formed and/or operated a business for the purpose of knowingly and  
24 willfully submitting false insurance claims in an attempt to obtain insurance  
25 proceeds to which they were not lawfully entitled;
- 26 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
27 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
28 information of an individual named Terri L. Strahan;

- 1 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
2 knowingly and willfully assisted all of her codefendants in attempting to obtain said  
3 insurance proceeds by, either on her own or by and through her agent(s), billing  
4 Strahan's health insurance company, Sierra Health and Life and/or its affiliate(s), by  
5 using medical codes that corresponded with services that all codefendants knew  
6 they and their agents and employees were not providing to Strahan;
- 7 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
8 knowingly and willfully assisted all of his codefendants in attempting to obtain said  
9 insurance proceeds by providing his coconspirators with his National Provider  
10 Identification number so that they could use it to bill insurers for services that he  
11 (MASSEY) knew he, his codefendants, and their agents and employees did not  
12 provide to their clients;
- 13 • Sierra Health and Life and/or its affiliate(s) did not pay the defendants and/or their  
14 agent(s) for the insurance claims in the amount of \$3,500.00 or more made for  
15 services that were never provided to Strahan.

16  
17 **COUNT THIRTY-SEVEN**

18 **ATTEMPT – THEFT**

19 **(NRS 193.330, 205.0832(1)(c) – Category C Felony)**

20 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
21 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about November 3, 2011 through May  
22 28, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted to  
23 obtain, or assisted, abetted, solicited, or conspired with another person in an attempt to  
24 obtain, real, personal or intangible property or the services of another person by a material  
25 misrepresentation with intent to deprive that person of the property or service, with the value  
26 of said property being \$3,500.00 or more, to wit:

- 26 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
27 agent(s), formed and/or operated a business for the purpose of knowingly and  
28

1 willfully submitting false insurance claims in an attempt to obtain insurance  
2 proceeds to which they were not lawfully entitled;

- 3 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
4 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
5 information of an individual named Carol W. Sullivan;
- 6 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
7 knowingly and willfully assisted all of her codefendants in an attempt to obtain said  
8 insurance proceeds by, either on her own or by and through her agent(s), billing  
9 Sullivan's health insurance company, Sierra Health and Life and/or its affiliate(s), by  
10 using medical codes that corresponded with services that all codefendants knew  
11 they and their agents and employees were not providing to Sullivan;
- 12 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
13 knowingly and willfully assisted all of his codefendants in attempting to obtain said  
14 insurance proceeds by providing his coconspirators with his National Provider  
15 Identification number so that they could use it to bill insurers for services that he  
16 (MASSEY) knew he, his codefendants, and their agents and employees did not  
17 provide to their clients;
- 18 • Sierra Health and Life and/or its affiliate(s) did not pay the defendants and/or their  
19 agent(s) for the insurance claims in the amount of \$3,500.00 or more made for  
20 services that were never provided to Sullivan.

21  
22 **COUNT THIRTY-EIGHT**  
23 **ATTEMPT – THEFT**  
24 **(NRS 193.330, 205.0832(1)(c) – Category C Felony)**

25 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
26 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 26, 2011 through May  
27 22, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted to  
28 obtain, or assisted, abetted, solicited, or conspired with another person in an attempt to  
obtain, real, personal or intangible property or the services of another person by a material

1 misrepresentation with intent to deprive that person of the property or service, with the value  
2 of said property being \$3,500.00 or more, to wit:

- 3 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
4 agent(s), formed and/or operated a business for the purpose of knowingly and  
5 willfully submitting false insurance claims in an attempt to obtain insurance  
6 proceeds to which they were not lawfully entitled;
- 7 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
8 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
9 information of an individual named Cindy B. Sullivan;
- 10 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
11 knowingly and willfully assisted all of her codefendants in attempting to obtain said  
12 insurance proceeds by, either on her own or by and through her agent(s), billing  
13 Sullivan's health insurance company, Sierra Health and Life and/or its affiliate(s), by  
14 using medical codes that corresponded with services that all codefendants knew  
15 they and their agents and employees were not providing to Sullivan;
- 16 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
17 knowingly and willfully assisted all of his codefendants in attempting to obtain said  
18 insurance proceeds by providing his coconspirators with his National Provider  
19 Identification number so that they could use it to bill insurers for services that he  
20 (MASSEY) knew he, his codefendants, and their agents and employees did not  
21 provide to their clients;
  - 22 • Sierra Health and Life and/or its affiliate(s) did not pay the defendants  
23 and/or their agent(s) for insurance claims in the amount of \$3,500.00 or more made  
24 for services that were never provided to Sullivan.

25 **COUNT THIRTY-NINE**  
26 **THEFT**

26 **(NRS 205.0832(1)(c) – Category B Felony)**

27 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
28 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through

1 February 14, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained,  
2 or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or  
3 intangible property or the services of another person by a material misrepresentation with  
4 intent to deprive that person of the property or service, with the value of said property being  
5 \$3,500.00 or more, to wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Shannon Blackerby;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Blackerby's  
16 health insurance company, Sierra Health and Life and/or its affiliate(s), by using  
17 medical codes that corresponded with services that all codefendants knew they and  
18 their agents and employees were not providing to Blackerby;
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients;
- 25 • As a result, Sierra Health and Life and/or its affiliate(s) paid the defendants and/or  
26 their agent(s) \$3,500.00 or more for insurance claims made for services that were  
27 never provided to Blackerby.

**COUNT FORTY**  
**ATTEMPT – THEFT**  
**(NRS 193.330, 205.0832(1)(c) – Category C Felony)**

Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 28, 2011 through February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted to obtain, or assisted, abetted, solicited, or conspired with another person in attempting to obtain, real, personal or intangible property or the services of another person by a material misrepresentation with intent to deprive that person of the property or service, with the value of said property being \$3,500.00 or more, to wit:

- Defendants RUPPERT and AZOULAY, either on their own or by and through their agent(s), formed and/or operated a business for the purpose of knowingly and willfully submitting false insurance claims in an attempt to obtain insurance proceeds to which they were not lawfully entitled;
- RUPPERT and AZOULAY, either on their own or by and through their agent(s) acting at the direction of RUPPERT and AZOULAY, obtained the health insurance information of an individual named Joann Crolli;
- At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO knowingly and willfully assisted all of her codefendants in attempting to obtain said insurance proceeds by, either on her own or by and through her agent(s), billing Crolli's health insurance company, Sierra Health and Life and/or its affiliate(s), by using medical codes that corresponded with services that all codefendants knew they and their agents and employees were not providing to Crolli;
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in attempting to obtain said insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill insurers for services that he (MASSEY) knew he, his codefendants, and their agents and employees did not provide to their clients;

- 1 • Sierra Health and Life and/or its affiliate(s) did not pay the defendants and/or their  
2 agent(s) for insurance claims in the amount of \$3,500.00 or more made for services  
3 that were never provided to Crolli.

4  
5 **COUNT FORTY-ONE**  
6 **ATTEMPT – THEFT**  
7 **(NRS 193.330, 205.0832(1)(c) – Category C Felony)**

8 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
9 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 24, 2011 through  
10 February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted  
11 to obtain, or assisted, abetted, solicited, or conspired with another person in attempting to  
12 obtain, real, personal or intangible property or the services of another person by a material  
13 misrepresentation with intent to deprive that person of the property or service, with the value  
14 of said property being \$3,500.00 or more, to wit:

- 15 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
16 agent(s), formed and/or operated a business for the purpose of knowingly and  
17 willfully submitting false insurance claims in attempting to obtain insurance  
18 proceeds to which they were not lawfully entitled;
- 19 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
20 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
21 information of an individual named Dora Herrman;
- 22 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
23 knowingly and willfully assisted all of her codefendants in attempting to obtain said  
24 insurance proceeds by, either on her own or by and through her agent(s), billing  
25 Hermann's health insurance company, Sierra Health and Life and/or its affiliate(s),  
26 by using medical codes that corresponded with services that all codefendants knew  
27 they and their agents and employees were not providing to Herrman;
- 28 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
29 knowingly and willfully assisted all of his codefendants in attempting to obtain said

1 insurance proceeds by providing his coconspirators with his National Provider  
2 Identification number so that they could use it to bill insurers for services that he  
3 (MASSEY) knew he, his codefendants, and their agents and employees did not  
4 provide to their clients;

- 5 • Sierra Health and Life and/or its affiliate(s) did not pay the defendants and/or their  
6 agent(s) for insurance claims in the amount of \$3,500.00 or more made for services  
7 that were never provided to Herrman.

8  
9 **COUNT FORTY-TWO**  
**ATTEMPT - THEFT**

10 **(NRS 193.330, 205.0832(1)(c) - Category C Felony)**

11 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
12 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about October 24, 2011 through  
13 February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted  
14 to obtain, or assisted, abetted, solicited, or conspired with another person in attempting to  
15 obtain, real, personal or intangible property or the services of another person by a material  
16 misrepresentation with intent to deprive that person of the property or service, with the value  
17 of said property being \$3,500.00 or more, to wit:

- 18 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
19 agent(s), formed and/or operated a business for the purpose of knowingly and  
20 willfully submitting false insurance claims in an attempt to obtain insurance  
21 proceeds to which they were not lawfully entitled;
- 22 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
23 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
24 information of an individual named David Johnson;
- 25 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
26 knowingly and willfully assisted all of her codefendants in attempting to obtain said  
27 insurance proceeds by, either on her own or by and through her agent(s), billing  
28 Johnson's health insurance company, Sierra Health and Life and/or its affiliate(s),

1 by using medical codes that corresponded with services that all codefendants knew  
2 they and their agents and employees were not providing to Johnson;

- 3 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
4 knowingly and willfully assisted all of his codefendants in attempting to obtain said  
5 insurance proceeds by providing his coconspirators with his National Provider  
6 Identification number so that they could use it to bill insurers for services that he  
7 (MASSEY) knew he, his codefendants, and their agents and employees did not  
8 provide to their clients;
- 9 • Sierra Health and Life and/or its affiliate(s) did not pay the defendants and/or their  
10 agent(s) for insurance claims in the amount of \$3,500.00 or more made for services  
11 that were never provided to Johnson.

12  
13 **COUNT FORTY-THREE**  
14 **ATTEMPT – THEFT**  
15 **(NRS 193.330, 205.0832(1)(c) – Category C Felony)**

16 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
17 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 31, 2011 through  
18 February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted  
19 to obtain, or assisted, abetted, solicited, or conspired with another person in attempting to  
20 obtain, real, personal or intangible property or the services of another person by a material  
21 misrepresentation with intent to deprive that person of the property or service, with the value  
of said property being \$3,500.00 or more, to wit:

- 22 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
23 agent(s), formed and/or operated a business for the purpose of knowingly and  
24 willfully submitting false insurance claims in an attempt to obtain insurance  
25 proceeds to which they were not lawfully entitled;
- 26 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
27 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
28 information of an individual named Lisa Johnson;

- 1 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
2 knowingly and willfully assisted all of her codefendants in attempting to obtain said  
3 insurance proceeds by, either on her own or by and through her agent(s), billing  
4 Johnson's health insurance company, Sierra Health and Life and/or its affiliate(s),  
5 by using medical codes that corresponded with services that all codefendants knew  
6 they and their agents and employees were not providing to Johnson;
- 7 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
8 knowingly and willfully assisted all of his codefendants in attempting to obtain said  
9 insurance proceeds by providing his coconspirators with his National Provider  
10 Identification number so that they could use it to bill insurers for services that he  
11 (MASSEY) knew he, his codefendants, and their agents and employees did not  
12 provide to their clients;
- 13 • Sierra Health and Life and/or its affiliate(s) did not pay the defendants and/or their  
14 agent(s) for insurance claims in the amount of \$3,500.00 or more made for services  
15 that were never provided to Johnson.

16 **COUNT FORTY-FOUR**  
17 **THEFT**

18 **(NRS 205.0832(1)(c) – Category B Felony)**

19 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
20 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through  
21 February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained,  
22 or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or  
23 intangible property or the services of another person by a material misrepresentation with  
24 intent to deprive that person of the property or service, with the value of said property being  
25 \$3,500.00 or more, to wit:

- 25 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
26 agent(s), formed and/or operated a business for the purpose of knowingly and  
27 willfully submitting false insurance claims in order to obtain insurance proceeds to  
28 which they were not lawfully entitled;

- 1 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
2 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
3 information of an individual named Beatriz Kremer;
- 4 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
5 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
6 proceeds by, either on her own or by and through her agent(s), billing Kremer's  
7 health insurance company, Sierra Health and Life and/or its affiliate(s), by using  
8 medical codes that corresponded with services that all codefendants knew they and  
9 their agents and employees were not providing to Kremer;
- 10 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
11 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
12 proceeds by providing his coconspirators with his National Provider Identification  
13 number so that they could use it to bill insurers for services that he (MASSEY) knew  
14 he, his codefendants, and their agents and employees did not provide to their  
15 clients;
- 16 • As a result, Sierra Health and Life and/or its affiliate(s) paid the defendants and/or  
17 their agent(s) \$3,500.00 or more for insurance claims made for services that were  
18 never provided to Kremer.

19  
20 **COUNT FORTY-FIVE**  
21 **ATTEMPT – THEFT**  
22 **(NRS 193.330, 205.0832(1)(c) – Category C Felony)**

23 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
24 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about October 24, 2011 through  
25 February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted  
26 to obtain, or assisted, abetted, solicited, or conspired with another person in attempting to  
27 obtain, real, personal or intangible property or the services of another person by a material  
28 misrepresentation with intent to deprive that person of the property or service, with the value  
of said property being \$3,500.00 or more, to wit:

- 1 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
2 agent(s), formed and/or operated a business for the purpose of knowingly and  
3 willfully submitting false insurance claims in an attempt to obtain insurance  
4 proceeds to which they were not lawfully entitled;
- 5 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
6 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
7 information of an individual named Kelli Marek;
- 8 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
9 knowingly and willfully assisted all of her codefendants in attempting to obtain said  
10 insurance proceeds by, either on her own or by and through her agent(s), billing  
11 Marek's health insurance company, Sierra Health and Life and/or its affiliate(s), by  
12 using medical codes that corresponded with services that all codefendants knew  
13 they and their agents and employees were not providing to Marek;
- 14 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
15 knowingly and willfully assisted all of his codefendants in attempting to obtain said  
16 insurance proceeds by providing his coconspirators with his National Provider  
17 Identification number so that they could use it to bill insurers for services that he  
18 (MASSEY) knew he, his codefendants, and their agents and employees did not  
19 provide to their clients;
- 20 • Sierra Health and Life and/or its affiliate(s) did not pay the defendants and/or their  
21 agent(s) insurance claims in the amount of \$3,500.00 or more made for services  
22 that were never provided to Marek.

23  
24 **COUNT FORTY-SIX**  
25 **ATTEMPT - THEFT**  
26 **(NRS 193.330, 205.0832(1)(c) - Category C Felony)**

27 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
28 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about September 12, 2011 through  
December 8, 2011, within Clark County, Nevada, without lawful authority, knowingly

1 attempted to obtain, or assisted, abetted, solicited, or conspired with another person in an  
2 attempt to obtain, real, personal or intangible property or the services of another person by a  
3 material misrepresentation with intent to deprive that person of the property or service, with  
4 the value of said property being \$3,500.00 or more, to wit:

- 5 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
6 agent(s), formed and/or operated a business for the purpose of knowingly and  
7 willfully submitting false insurance claims in order to obtain insurance proceeds to  
8 which they were not lawfully entitled;
- 9 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
10 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
11 information of an individual named Michael Morris;
- 12 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
13 knowingly and willfully assisted all of her codefendants in attempting to obtain said  
14 insurance proceeds by, either on her own or by and through her agent(s), billing  
15 Morris' health insurance company, Sierra Health and Life and/or its affiliate(s), by  
16 using medical codes that corresponded with services that all codefendants knew  
17 they and their agents and employees were not providing to Morris;
- 18 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
19 knowingly and willfully assisted all of his codefendants in attempting to obtain said  
20 insurance proceeds by providing his coconspirators with his National Provider  
21 Identification number so that they could use it to bill insurers for services that he  
22 (MASSEY) knew he, his codefendants, and their agents and employees did not  
23 provide to their clients;
- 24 • Sierra Health and Life and/or its affiliate(s) did not pay the defendants and/or their  
25 agent(s) for insurance claims in the amount of \$3,500.00 or more made for services  
26 that were never provided to Morris.

1 COUNT FORTY-SEVEN

2 THEFT

3 (NRS 205.0832(1)(c) – Category B Felony)

4 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
5 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through  
6 February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained,  
7 or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or  
8 intangible property or the services of another person by a material misrepresentation with  
9 intent to deprive that person of the property or service, with the value of said property being  
\$3,500.00 or more, to wit:

- 10
- 11 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
12 agent(s), formed and/or operated a business for the purpose of knowingly and  
13 willfully submitting false insurance claims in order to obtain insurance proceeds to  
14 which they were not lawfully entitled;
  - 15 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
16 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
17 information of an individual named Brian Saffle;
  - 18 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
19 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
20 proceeds by, either on her own or by and through her agent(s), billing Saffle's health  
21 insurance company, Sierra Health and Life and/or its affiliate(s), by using medical  
22 codes that corresponded with services that all codefendants knew they and their  
23 agents and employees were not providing to Saffle;
  - 24 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
25 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
26 proceeds by providing his coconspirators with his National Provider Identification  
27 number so that they could use it to bill insurers for services that he (MASSEY) knew  
28 he, his codefendants, and their agents and employees did not provide to their  
clients;

- 1 • As a result, Sierra Health and Life and/or its affiliate(s) paid the defendants and/or  
2 their agent(s) \$3,500.00 or more for insurance claims made for services that were  
3 never provided to Saffle.

4  
5 **COUNT FORTY-EIGHT**

6 **THEFT**

7 **(NRS 205.0832(1)(c) – Category C Felony)**

8 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
9 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through  
10 February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained,  
11 or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or  
12 intangible property or the services of another person by a material misrepresentation with  
13 intent to deprive that person of the property or service, with the value of said property being  
\$650.00 or more but less than \$3,500.00, to wit:

- 14 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
15 agent(s), formed and/or operated a business for the purpose of knowingly and  
16 willfully submitting false insurance claims in order to obtain insurance proceeds to  
17 which they were not lawfully entitled;
- 18 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
19 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
20 information of an individual named Kendra Saffle;
- 21 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
22 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
23 proceeds by, either on her own or by and through her agent(s), billing Saffle's health  
24 insurance company, Sierra Health and Life and/or its affiliate(s), by using medical  
25 codes that corresponded with services that all codefendants knew they and their  
26 agents and employees were not providing to Saffle;
- 27 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
28 knowingly and willfully assisted all of his codefendants in obtaining said insurance

1 proceeds by providing his coconspirators with his National Provider Identification  
2 number so that they could use it to bill insurers for services that he (MASSEY) knew  
3 he, his codefendants, and their agents and employees did not provide to their  
4 clients;

- 5 • As a result, Sierra Health and Life and/or its affiliate(s) paid the defendants and/or  
6 their agent(s) \$650.00 or more but less than \$3,500.00 or more for insurance claims  
7 made for services that were never provided to Saffle.

8  
9 **COUNT FORTY-NINE**  
10 **ATTEMPT – THEFT**  
11 **(NRS 193.330, 205.0832(1)(c) – Category C Felony)**

12 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
13 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 24, 2011 through  
14 February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted  
15 to obtain, or assisted, abetted, solicited, or conspired with another person in an attempt to  
16 obtain, real, personal or intangible property or the services of another person by a material  
17 misrepresentation with intent to deprive that person of the property or service, with the value  
18 of said property being \$3,500.00 or more, to wit:

- 18 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
19 agent(s), formed and/or operated a business for the purpose of knowingly and  
20 willfully submitting false insurance claims in order to obtain insurance proceeds to  
21 which they were not lawfully entitled;
- 22 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
23 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
24 information of an individual named Denise Whipple;
- 25 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
26 knowingly and willfully assisted all of her codefendants in attempting to obtain said  
27 insurance proceeds by, either on her own or by and through her agent(s), billing  
28 Whipple's health insurance company, Sierra Health and Life and/or its affiliate(s), by

1 using medical codes that corresponded with services that all codefendants knew  
2 they and their agents and employees were not providing to Whipple;

- 3 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
4 knowingly and willfully assisted all of his codefendants in attempting to obtain said  
5 insurance proceeds by providing his coconspirators with his National Provider  
6 Identification number so that they could use it to bill insurers for services that he  
7 (MASSEY) knew he, his codefendants, and their agents and employees did not  
8 provide to their clients;
- 9 • Sierra Health and Life and/or its affiliate(s) did not pay the defendants and/or their  
10 agent(s) for insurance claims in the amount of \$3,500.00 or more made for services  
11 that were never provided to Whipple.

12  
13 **COUNT FIFTY**  
14 **ATTEMPT – THEFT**  
15 **(NRS 193.330, 205.0832(1)(c) – Category C Felony)**

16 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
17 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about October 24, 2011 through  
18 February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted  
19 to obtain, or assisted, abetted, solicited, or conspired with another person in an attempt to  
20 obtain, real, personal or intangible property or the services of another person by a material  
21 misrepresentation with intent to deprive that person of the property or service, with the value  
22 of said property being \$3,500.00 or more, to wit:

- 22 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
23 agent(s), formed and/or operated a business for the purpose of knowingly and  
24 willfully submitting false insurance claims in order to obtain insurance proceeds to  
25 which they were not lawfully entitled;
- 26 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
27 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
28 information of an individual named Timothy Whipple;

- 1 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
2 knowingly and willfully assisted all of her codefendants in attempting to obtain said  
3 insurance proceeds by, either on her own or by and through her agent(s), billing  
4 Whipple's health insurance company, Sierra Health and Life and/or its affiliate(s), by  
5 using medical codes that corresponded with services that all codefendants knew  
6 they and their agents and employees were not providing to Whipple;
- 7 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
8 knowingly and willfully assisted all of his codefendants in attempting to obtain said  
9 insurance proceeds by providing his coconspirators with his National Provider  
10 Identification number so that they could use it to bill insurers for services that he  
11 (MASSEY) knew he, his codefendants, and their agents and employees did not  
12 provide to their clients;
- 13 • Sierra Health and Life and/or its affiliate(s) did not pay the defendants and/or their  
14 agent(s) for insurance claims in the amount of \$3,500.00 or more made for services  
15 that were never provided to Whipple.

16  
17 **COUNT FIFTY-ONE**  
**ATTEMPT – THEFT**

18 **(NRS 205.0832(1)(c) – Category D Felony or Gross Misdemeanor)**

19 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
20 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about January 11, 2012 through April  
21 13, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted to  
22 obtain, or assisted, abetted, solicited, or conspired with another person in an attempt to  
23 obtain, real, personal or intangible property or the services of another person by a material  
24 misrepresentation with intent to deprive that person of the property or service, with the value  
25 of said property being \$650 or more but less than \$3,500.00, to wit:

- 26 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
27 agent(s), formed and/or operated a business for the purpose of knowingly and  
28

1 willfully submitting false insurance claims in order to obtain insurance proceeds to  
2 which they were not lawfully entitled;

- 3 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
4 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
5 information of an individual named Terry Coffing;
- 6 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
7 knowingly and willfully assisted all of her codefendants in attempting to obtain said  
8 insurance proceeds by, either on her own or by and through her agent(s), billing  
9 Coffing's health insurance company, Aetna and/or its affiliate(s), by using medical  
10 codes that corresponded with services that all codefendants knew they and their  
11 agents and employees were not providing to Coffing;
- 12 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
13 knowingly and willfully assisted all of his codefendants in attempting to obtain said  
14 insurance proceeds by providing his coconspirators with his National Provider  
15 Identification number so that they could use it to bill insurers for services that he  
16 (MASSEY) knew he, his codefendants, and their agents and employees did not  
17 provide to their clients;
- 18 • Aetna and/or its affiliate(s) did not pay the defendants and/or their agent(s) for  
19 insurance claims in the amount of \$650.00 or more but less than \$3,500.00 made  
20 for services that were never provided to Coffing.

21  
22 **COUNT FIFTY-TWO**  
23 **ATTEMPT – THEFT**  
**(NRS 193.330, 205.0832(1)(c) – Category C Felony)**

24 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
25 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through  
26 February 8, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted  
27 to obtain, or assisted, abetted, solicited, or conspired with another person in an attempt to  
28 obtain, real, personal or intangible property or the services of another person by a material

1 misrepresentation with intent to deprive that person of the property or service, with the value  
2 of said property being \$3,500.00 or more, to wit:

- 3 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
4 agent(s), formed and/or operated a business for the purpose of knowingly and  
5 willfully submitting false insurance claims in order to obtain insurance proceeds to  
6 which they were not lawfully entitled;
- 7 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
8 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
9 information of an individual named Amy Dahlstrom;
- 10 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
11 knowingly and willfully assisted all of her codefendants in attempting to obtain said  
12 insurance proceeds by, either on her own or by and through her agent(s), billing  
13 Dahlstrom's health insurance company, Aetna and/or its affiliate(s), by using  
14 medical codes that corresponded with services that all codefendants knew they and  
15 their agents and employees were not providing to Dahlstrom;
- 16 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
17 knowingly and willfully assisted all of his codefendants in attempting to obtain said  
18 insurance proceeds by providing his coconspirators with his National Provider  
19 Identification number so that they could use it to bill insurers for services that he  
20 (MASSEY) knew he, his codefendants, and their agents and employees did not  
21 provide to their clients;
- 22 • Aetna and/or its affiliate(s) did not pay the defendants and/or their agent(s) for  
23 insurance claims in the amount of \$3,500.00 or more made for services that were  
24 never provided to Dahlstrom.

25 **COUNT FIFTY-THREE**  
26 **THEFT**

27 **(NRS 205.0832(1)(c) – Category B Felony)**

28 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about September 12, 2011 through

1 January 2, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained, or  
2 assisted, abetted, solicited, or conspired with another person to obtain, real, personal or  
3 intangible property or the services of another person by a material misrepresentation with  
4 intent to deprive that person of the property or service, with the value of said property being  
5 \$3,500.00 or more, to wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Monica Fleming;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Fleming's  
16 health insurance company, Aetna and/or its affiliate(s), by using medical codes that  
17 corresponded with services that all codefendants knew they and their agents and  
18 employees were not providing to Fleming;
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients; and
- 25 • As a result, Aetna and/or its affiliate(s) paid the defendants and/or their agent(s)  
26 \$3,500.00 or more for insurance claims made for services that were never provided  
27 to Fleming.

**COUNT FIFY-FOUR**  
**THEFT**

**(NRS 205.0832(1)(c) – Category C Felony)**

Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through December 14, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained, or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or intangible property or the services of another person by a material misrepresentation with intent to deprive that person of the property or service, with the value of said property being \$650.00 or more but less than \$3,500.00, to wit:

- Defendants RUPPERT and AZOULAY, either on their own or by and through their agent(s), formed and/or operated a business for the purpose of knowingly and willfully submitting false insurance claims in order to obtain insurance proceeds to which they were not lawfully entitled;
- RUPPERT and AZOULAY, either on their own or by and through their agent(s) acting at the direction of RUPPERT and AZOULAY, obtained the health insurance information of an individual named Colin Mcrae;
- At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO knowingly and willfully assisted all of her codefendants in obtaining said insurance proceeds by, either on her own or by and through her agent(s), billing Mcrae's health insurance company, Aetna and/or its affiliate(s), by using medical codes that corresponded with services that all codefendants knew they and their agents and employees were not providing to Mcrae;
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in obtaining said insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill insurers for services that he (MASSEY) knew he, his codefendants, and their agents and employees did not provide to their clients;

- 1 • As a result, Aetna and/or its affiliate(s) paid the defendants and/or their agent(s)  
2 \$650.00 or more but less than \$3,500.00 for insurance claims made for services  
3 that were never provided to Mcrae.

4  
5 **COUNT FIFTY-FIVE**  
6 **ATTEMPT – THEFT**  
7 **(NRS 193.330, 205.0832(1)(c) – Category C Felony)**

8 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
9 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through  
10 February 20, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted  
11 to obtain, or assisted, abetted, solicited, or conspired with another person in an attempt to  
12 obtain, real, personal or intangible property or the services of another person by a material  
13 misrepresentation with intent to deprive that person of the property or service, with the value  
14 of said property being \$3,500.00 or more, to wit:

- 15 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
16 agent(s), formed and/or operated a business for the purpose of knowingly and  
17 willfully submitting false insurance claims in order to obtain insurance proceeds to  
18 which they were not lawfully entitled;
- 19 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
20 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
21 information of an individual named Jennifer Plinio;
- 22 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
23 knowingly and willfully assisted all of her codefendants in attempting to obtain said  
24 insurance proceeds by, either on her own or by and through her agent(s), billing  
25 Plinio's health insurance company, Aetna and/or its affiliate(s), by using medical  
26 codes that corresponded with services that all codefendants knew they and their  
27 agents and employees were not providing to Plinio;
- 28 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
29 knowingly and willfully assisted all of his codefendants in attempting to obtain said

1 insurance proceeds by providing his coconspirators with his National Provider  
2 Identification number so that they could use it to bill insurers for services that he  
3 (MASSEY) knew he, his codefendants, and their agents and employees did not  
4 provide to their clients;

- 5 • Aetna and/or its affiliate(s) did not pay the defendants and/or their agent(s) for  
6 insurance claims in the amount of \$3,500.00 or more made for services that were  
7 never provided to Plinio.

8  
9 **COUNT FIFTY-SIX**  
**ATTEMPT – THEFT**

10 **(NRS 193.330, 205.0832(1)(c) – Category C Felony)**

11 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
12 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through  
13 February 6, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted  
14 to obtain, or assisted, abetted, solicited, or conspired with another person in an attempt to  
15 obtain, real, personal or intangible property or the services of another person by a material  
16 misrepresentation with intent to deprive that person of the property or service, with the value  
17 of said property being \$3,500.00 or more, to wit:

- 18 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
19 agent(s), formed and/or operated a business for the purpose of knowingly and  
20 willfully submitting false insurance claims in order to obtain insurance proceeds to  
21 which they were not lawfully entitled;
- 22 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
23 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
24 information of an individual named Brenna Schrader;
- 25 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
26 knowingly and willfully assisted all of her codefendants in attempting to obtain said  
27 insurance proceeds by, either on her own or by and through her agent(s), billing  
28 Schrader's health insurance company, Aetna and/or its affiliate(s), by using medical

1 codes that corresponded with services that all codefendants knew they and their  
2 agents and employees were not providing to Schrader;

- 3 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
4 knowingly and willfully assisted all of his codefendants in attempting to obtain said  
5 insurance proceeds by providing his coconspirators with his National Provider  
6 Identification number so that they could use it to bill insurers for services that he  
7 (MASSEY) knew he, his codefendants, and their agents and employees did not  
8 provide to their clients; and
- 9 • Aetna and/or its affiliate(s) did not pay the defendants and/or their agent(s) for  
10 insurance claims in the amount of \$3,500.00 or more made for services that were  
11 never provided to Schrader.

12  
13 **COUNT FIFTY-SEVEN**  
14 **THEFT**

14 **(NRS 205.0832(1)(c) – Category B Felony)**

15 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
16 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through  
17 February 1, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained,  
18 or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or  
19 intangible property or the services of another person by a material misrepresentation with  
20 intent to deprive that person of the property or service, with the value of said property being  
21 \$3,500.00 or more, to wit:

- 22 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
23 agent(s), formed and/or operated a business for the purpose of knowingly and  
24 willfully submitting false insurance claims in order to obtain insurance proceeds to  
25 which they were not lawfully entitled;
- 26 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
27 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
28 information of an individual named Kimberly Sexton;



1 willfully submitting false insurance claims in order to obtain insurance proceeds to  
2 which they were not lawfully entitled;

- 3 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
4 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
5 information of an individual named Megan Sheffield;
- 6 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
7 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
8 proceeds by, either on her own or by and through her agent(s), billing Sheffield  
9 health insurance company, Aetna and/or its affiliate(s), by using medical codes that  
10 corresponded with services that all codefendants knew they and their agents and  
11 employees were not providing to Scheffield;
- 12 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
13 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
14 proceeds by providing his coconspirators with his National Provider Identification  
15 number so that they could use it to bill insurers for services that he (MASSEY) knew  
16 he, his codefendants, and their agents and employees did not provide to their  
17 clients;
- 18 • As a result, Aetna and/or its affiliate(s) paid the defendants and/or their agent(s)  
19 \$3,500.00 or more for insurance claims made for services that were never provided  
20 to Sheffield.

21  
22 **COUNT FIFTY-NINE**  
**THEFT**

23 **(NRS 205.0832(1)(c) – Category B Felony)**

24 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
25 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through  
26 November 23, 2011, within Clark County, Nevada, without lawful authority, knowingly  
27 obtained, or assisted, abetted, solicited, or conspired with another person to obtain, real,  
28 personal or intangible property or the services of another person by a material

1 misrepresentation with intent to deprive that person of the property or service, with the value  
2 of said property being \$3,500.00 or more, to wit:

- 3 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
4 agent(s), formed and/or operated a business for the purpose of knowingly and  
5 willfully submitting false insurance claims in order to obtain insurance proceeds to  
6 which they were not lawfully entitled;
- 7 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
8 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
9 information of an individual named Nicole Gervasi;
- 10 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
11 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
12 proceeds by, either on her own or by and through her agent(s), billing Gervasi's  
13 health insurance company, Golden Rule and/or its affiliate(s), by using medical  
14 codes that corresponded with services that all codefendants knew they and their  
15 agents and employees were not providing to Gervasi;
- 16 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
17 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
18 proceeds by providing his coconspirators with his National Provider Identification  
19 number so that they could use it to bill insurers for services that he (MASSEY) knew  
20 he, his codefendants, and their agents and employees did not provide to their  
21 clients;
- 22 • As a result, Golden Rule and/or its affiliate(s) paid the defendants and/or their  
23 agent(s) \$3,500.00 or more for insurance claims made for services that were never  
24 provided to Gervasi.

25 **COUNT SIXTY**  
26 **THEFT**

27 **(NRS 205.0832(1)(c) – Category C Felony)**

28 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through April

1 3, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained, or  
2 assisted, abetted, solicited, or conspired with another person to obtain, real, personal or  
3 intangible property or the services of another person by a material misrepresentation with  
4 intent to deprive that person of the property or service, with the value of said property being  
5 \$650.00 or more but less than \$3,500.00, to wit:

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
7 agent(s), formed and/or operated a business for the purpose of knowingly and  
8 willfully submitting false insurance claims in order to obtain insurance proceeds to  
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
12 information of an individual named Dannine Budinger;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO  
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
15 proceeds by, either on her own or by and through her agent(s), billing Budinger's  
16 health insurance company, Cigna and/or its affiliate(s), by using medical codes that  
17 corresponded with services that all codefendants knew they and their agents and  
18 employees were not providing to Budinger;
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
21 proceeds by providing his coconspirators with his National Provider Identification  
22 number so that they could use it to bill insurers for services that he (MASSEY) knew  
23 he, his codefendants, and their agents and employees did not provide to their  
24 clients;
- 25 • As a result, Cigna and/or its affiliate(s) paid the defendants and/or their agent(s)  
26 \$650.00 or more but less than \$3,500.00 for insurance claims made for services  
27 that were never provided to Budinger.

**COUNT SIXTY-ONE**

**THEFT**

**(NRS 205.0832(1)(c) – Category C Felony)**

1  
2 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
3 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 16, 2011 through  
4 February 11, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained,  
5 or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or  
6 intangible property or the services of another person by a material misrepresentation with  
7 intent to deprive that person of the property or service, with the value of said property being  
8 \$650.00 or more but less than \$3,500.00, to wit:

- 9
- 10 • Defendants RUPPERT and AZOULAY, either on their own or by and through their  
11 agent(s), formed and/or operated a business for the purpose of knowingly and  
12 willfully submitting false insurance claims in order to obtain insurance proceeds to  
13 which they were not lawfully entitled;
  - 14 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)  
15 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance  
16 information of an individual named Holly Mcrae;
  - 17 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO  
18 knowingly and willfully assisted all of her codefendants in obtaining said insurance  
19 proceeds by, either on her own or by and through her agent(s), billing Mcrae's  
20 health insurance company, Cigna and/or its affiliate(s), by using medical codes that  
21 corresponded with services that all codefendants knew they and their agents and  
22 employees were not providing to Mcrae;
  - 23 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY  
24 knowingly and willfully assisted all of his codefendants in obtaining said insurance  
25 proceeds by providing his coconspirators with his National Provider Identification  
26 number so that they could use it to bill insurers for services that he (MASSEY) knew  
27 he, his codefendants, and their agents and employees did not provide to their  
28 clients;

- As a result, Cigna and/or its affiliate(s) paid the defendants and/or their agent(s) \$650.00 or more but less than \$3,500.00 for insurance claims made for services that were never provided to Mcrae.

**COUNT SIXTY-TWO**  
**THEFT**  
**(NRS 205.0832(1)(c) – Category B Felony)**

Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through February 20, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained, or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or intangible property or the services of another person by a material misrepresentation with intent to deprive that person of the property or service, with the value of said property being \$3,500.00 or more, to wit:

- Defendants RUPPERT and AZOULAY, either on their own or by and through their agent(s), formed and/or operated a business for the purpose of knowingly and willfully submitting false insurance claims in order to obtain insurance proceeds to which they were not lawfully entitled;
- RUPPERT and AZOULAY, either on their own or by and through their agent(s) acting at the direction of RUPPERT and AZOULAY, obtained the health insurance information of an individual named Rachel Zurcher;
- At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO knowingly and willfully assisted all of her codefendants in obtaining said insurance proceeds by, either on her own or by and through her agent(s), billing Zurcher's health insurance company, Cigna and/or its affiliate(s), by using medical codes that corresponded with services that all codefendants knew they and their agents and employees were not providing to Zurcher;
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in obtaining said insurance proceeds by providing his coconspirators with his National Provider Identification

1 number so that they could use it to bill insurers for services that he (MASSEY) knew  
2 he, his codefendants, and their agents and employees did not provide to their  
3 clients;

- 4 • As a result, Cigna and/or its affiliate(s) paid the defendants and/or their agent(s)  
5 \$3,500.00 or more for insurance claims made for services that were never provided  
6 to Mcrae.

7  
8 **COUNT SIXTY-THREE**  
9 **PRACTICING OR OFFERING TO PRACTICE NURSING WITHOUT LICENSE**  
10 **(NRS 632.315 – Category D Felony)**

11 Defendant FRANK MASSEY, on or about September 12, 2011 through July 2, 2012,  
12 within Clark County, Nevada, did practice or offer to practice nursing in the State of Nevada or  
13 use or assist, abet, solicit, or conspire with another person to use any title, abbreviation, sign,  
14 card or device to indicate that he (MASSEY) was a practicing nursing in this State, without  
15 having been licensed pursuant to the provisions of chapter 632 of the Nevada Revised  
16 Statutes, to wit: MASSEY provided his codefendants with the National Provider Identification  
17 number he obtained as a California-licensed nurse in order to allow his codefendants and/or  
18 their agent(s) to submit insurance claims that included false representations that MASSEY  
19 was licensed to provide, and was in fact providing, nursing services in the State of Nevada.

20 **COUNT SIXTY-FOUR**  
21 **PRACTICING OR OFFERING TO PRACTICE NURSING WITHOUT LICENSE**  
22 **(NRS 632.315 – Category D Felony)**

23 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, and  
24 CHARLENE P. SIPPIO, on or about September 12, 2011 through July 2, 2012, within Clark  
25 County, Nevada, did practice or offer to practice nursing in the State of Nevada or use or  
26 assist, abet, solicit, or conspire with another person to use any title, abbreviation, sign, card or  
27 device to indicate that said other person was a practicing nursing in this State, without having  
28 been licensed pursuant to the provisions of chapter 632 of the Nevada Revised Statutes, to  
wit: Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, and

1 CHARLENE P. SIPPIO solicited and conspired with FRANK MASSEY to provide them with  
2 the National Provider Identification number he (MASSEY) obtained as a California-licensed  
3 nurse in order to allow the defendants and/or their agent(s) to submit insurance claims that  
4 included false representations that MASSEY was licensed to provide, and was in fact  
5 providing, nursing services in the State of Nevada.

6  
7 **COUNT SIXTY-FIVE**  
8 **RACKETEERING**  
9 **(NRS 207.400(1)(c) – Category B Felony)**

10 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL  
11 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through July  
12 2, 2012, while employed by or associated with an enterprise (i.e., any natural person, sole  
13 proprietorship, corporation, business trust or other legal entity; and any union, association or  
14 other group of persons associated in fact although not a legal entity) conducted or  
15 participated, directly or indirectly, in: (i) the affairs of the enterprise through racketeering  
16 activity (i.e., engaging in at least two crimes related to racketeering that have the same or  
17 similar pattern, intents, results, accomplices, victims, or methods of commission, or are  
18 otherwise interrelated by distinguishing characteristics and are not isolated incidents, with at  
19 least one of the incidents occurring after July 1, 1983, and the last of the incidents occurring  
20 within five years after a prior commission of a crime related to racketeering), or (ii)  
21 racketeering activity through the affairs of the enterprise, to wit:

- 22 1. The allegations contained in counts one through sixty-four are hereby repeated and  
23 incorporated herein as if fully set forth in this count.

24 **The Enterprise**

- 25 2. On or about September 12, 2011 through July 2, 2012, Defendants RICHARD  
26 RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and  
27 CHARLENE P. SIPPIO conducted business together, which at times operated  
28 under no specific business name, and at other times, operated under business  
names including Human Performance Enhancement and/or My Wellness Expert;

- 1 3. RUPPERT and AZOULAY, either personally or through their agent(s), created  
2 and/or managed said business;
- 3 4. RUPPERT and AZOULAY, either personally or through their agent(s), provided said  
4 business with physical locations, including 6012 Topaz Street, Suite #8, Las Vegas,  
5 NV 89120, and Canyon Gate Country Club, located at 2001 Canyon Gate Drive,  
6 Las Vegas, NV 89117, where the business was conducted;
- 7 5. Said business provided exercise and personal training services to its clients;
- 8 6. No one who worked for said business was licensed to provide physical therapy or  
9 other medical services in the State of Nevada;
- 10 7. Said business did not lawfully provide physical therapy or medical services in the  
11 State of Nevada;

12 **Racketeering Activity**

- 13 8. As described in greater detail in counts one through sixty-two, which charge  
14 Defendants with multiple counts of theft and insurance fraud, at the direction of  
15 RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO knowingly and  
16 willfully assisted all of her codefendants in obtaining said insurance proceeds by,  
17 either on her own or by and through her agent(s), billing the health insurance  
18 companies, including Meritain Health, Sierra Health and Life, Aetna, Golden Rule,  
19 Cigna, and/or their affiliate(s), of thirty-one of said business' clients, by using  
20 medical codes that corresponded with services, such as physical therapy, that all  
21 codefendants knew they and their agents and employees were not providing to their  
22 clients;
- 23 9. At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY,  
24 at all relevant times knowingly and willfully assisted all of his codefendants in  
25 obtaining said insurance proceeds by providing his coconspirators with his National  
26 Provider Identification number so that they could use it to bill said insurance  
27 companies for services, including physical therapy, that he (MASSEY) and his  
28

1 codefendant knew he, his codefendants, and their agents and employees did not  
2 provide to their clients;

3 10. RUPPERT, AZOULAY, SIPPIO, and MASSEY, either personally or by and through  
4 their agent(s), billed said insurance companies a total of more than \$800,000.00 for  
5 services said business did not provide;

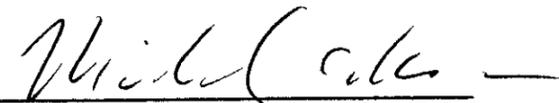
6 **Property Derived from, Realized through, or Used or Intended to Be Used in the Course**  
7 **of the Unlawful Acts**

8 11. Said insurance companies paid Defendants and/or their agent(s) and/or affiliate(s) a  
9 total of \$93,491.50 in satisfaction of those claims that the insurance companies  
10 approved.

11 All of which is contrary to the form, force, and effect of the statutes in such cases made  
12 and provided, and against the peace and dignity of the State of Nevada.  
13

14  
15 DATED this \_\_\_\_\_ day of February, 2015.

16 CATHERINE CORTEZ MASTO  
17 Attorney General

18 By:   
19 MICHAEL C. KOVAC, ESQ.  
20 Deputy Attorney General  
21 Nevada Bar No. 11177

22 ENDORSEMENT: A True Bill

23 By:   
24 Foreperson, Clark County Grand Jury  
25 GJ# 14BGJ017A-D

26 WITNESS LIST:

- 27 1. Phyllis Rost  
28 2. Linda Rosel  
3. Cobette Harber

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4. Mikel Demarinis
  5. Lousine Sevoian
  6. Christine B. Chistensen
  7. Erin Knighton
  8. Michael Levi Kennaw (trainer)
  9. Patricia Lavender
  10. Monica Fleming
  11. Rachael Zurcher
  12. Kimberly Sexton
  13. Lisa Habighorst