



CLERK OF THE COURT

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9 **DISTRICT COURT**

10 **CLARK COUNTY, STATE OF NEVADA**

11 STATE OF NEVADA,)

Case No.: C-15-304178-1

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,**)

18 Defendant(s).)

19 **INDICTMENT**

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 LESS THAN \$3,500.00 (Category D Felony or Gross Misdemeanor – NRS 193.330,
2 205.0832(1)(c), 205.0835); two counts of PRACTICING OR OFFERING TO PRACTICE
3 NURSING WITHOUT LICENSE (Category D Felony – NRS 632.315(2)); and one count of
4 RACKETEERING (a Category B Felony – NRS 207.400(1)(c)) committed within Clark County,
5 Nevada as follows:

6 **COUNT ONE**
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 September 12, 2011 through
11 March 5, 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 Shani J. Coleman;
- 23 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO
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 Coleman's
26 health insurance company, Meritain Health and/or its affiliate(s), by using medical
27 codes that corresponded with services that all codefendants knew they and their
28 agents and employees were not providing to Coleman; and

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

9
10 **COUNT FOUR**
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. SIPPIO, on or about September 29, 2011 through May
15 6, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist, abet,
16 solicit, or conspire with another person to present or caused to be presented to an insurer
17 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:

- 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 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 obtaining said insurance
27 proceeds by, either on her own or by and through her agent(s), billing Ramirez's
28 health insurance company, Sierra Health and Life and/or its affiliate(s), by using

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

9
10 **COUNT FIVE**
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. SIPPIO, on or about October 25, 2011 through June 5,
15 2012, within Clark County, Nevada, did knowingly and willfully, present or assist, abet, solicit,
16 or conspire with another person to present or caused to be presented to an insurer false or
17 misleading information concerning a material fact in support of a claim for benefits made
18 under a policy of insurance issued pursuant to the Nevada Insurance Act, 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 Terri L. Strahan;
- 25 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO
26 knowingly and willfully assisted all of her codefendants in obtaining said insurance
27 proceeds by, either on her own or by and through her agent(s), billing Strahan's
28 health insurance company, Sierra Health and Life and/or its affiliate(s), by using

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

9
10 **COUNT SIX**
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. SIPPIO, on or about November 3, 2011 through May
15 28, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist, abet,
16 solicit, or conspire with another person to present or caused to be presented to an insurer
17 false or misleading information concerning a material fact in support of a claim for benefits
18 made under a policy of insurance issued pursuant to the Nevada Insurance Act, to wit:

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

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

9
10 **COUNT SEVEN**
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. SIPPIO, on or about October 26, 2011 through May
15 22, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist, abet,
16 solicit, or conspire with another person to present or caused to be presented to an insurer
17 false or misleading information concerning a material fact in support of a claim for benefits
18 made under a policy of insurance issued pursuant to the Nevada Insurance Act, 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 Cindy B. Sullivan;
- 25 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO
26 knowingly and willfully assisted all of her codefendants in obtaining said insurance
27 proceeds by, either on her own or by and through her agent(s), billing Sullivan's
28 health insurance company, Sierra Health and Life and/or its affiliate(s), by using

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

9
10 **COUNT EIGHT**
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 September 12, 2011 through
15 February 14, 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 Shannon Blackerby;
- 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 Blackerby'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 Blackerby; 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 NINE**
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. SIPPPIO, on or about October 28, 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 Joann Crolli;
- 28 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO
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 Crolli's health
2 insurance company, Sierra Health and Life and/or its affiliate(s), by using medical
3 codes that corresponded with services that all codefendants knew they and their
4 agents and employees were not providing to Crolli; 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.

11
12 **COUNT TEN**
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. SIPPIO, on or about October 24, 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 Dora Herrman;

- 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 David Johnson;
- 4 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO
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 Johnson'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 Johnson; 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 TWELVE**
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. SIPPIO, on or about October 31, 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 Lisa Johnson;
- 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 Johnson'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 Johnson; 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 THIRTEEN**
INSURANCE FRAUD

20 **(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 February 16, 2012, 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 Beatriz Kremer;
- 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 Kremer's
11 health insurance company, Sierra Health and Life and/or its affiliate(s), by using
12 medical codes that corresponded with services that all codefendants knew they and
13 their agents and employees were not providing to Kremer; 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 FOURTEEN**
22 **INSURANCE FRAUD**

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

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

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 Kelli Marek;
- 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 Marek's
13 health insurance company, Sierra Health and Life 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 Marek; 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 FIFTEEN**
24 **INSURANCE FRAUD**
25 **(NRS 686A.2815, 686A.291 – Category D Felony)**

26 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
27 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about September 12, 2011 through
28 December 8, 2011, 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

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 Michael Morris;
- 11 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO
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 Morris' 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 Morris; 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 SIXTEEN**
INSURANCE FRAUD

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

26 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
27 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about September 12, 2011 through
28 February 16, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,

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 Brian Saffle;
- 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 Saffle's health
15 insurance company, Sierra Health and Life and/or its affiliate(s), by using medical
16 codes that corresponded with services that all codefendants knew they and their
17 agents and employees were not providing to Saffle; 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 SEVENTEEN**
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 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 Kendra Saffle;
- 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 Saffle's health
16 insurance company, Sierra Health and Life 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 Saffle; 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
26 **COUNT EIGHTEEN**
27 **INSURANCE FRAUD**
28 **(NRS 686A.2815, 686A.291 – Category D Felony)**

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

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

27
28 **COUNT NINETEEN**
INSURANCE FRAUD

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

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

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

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

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

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

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

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

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

27 **COUNT TWENTY- TWO**
28 **INSURANCE FRAUD**
(NRS 686A.2815, 686A.291 – Category D Felony)

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

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

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

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

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

27 **COUNT TWENTY-FOUR**
28 **INSURANCE FRAUD**
(NRS 686A.2815, 686A.291 – Category D Felony)

1 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
2 FRANK MASSEY, and CHARLENE P. SIPPPIO, on or about September 12, 2011 through
3 February 20, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,
4 abet, solicit, or conspire with another person to present or caused to be presented to an
5 insurer false or misleading information concerning a material fact in support of a claim for
6 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to
7 wit:

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

27 **COUNT TWENTY-FIVE**
28 **INSURANCE FRAUD**
(NRS 686A.2815, 686A.291 – Category D Felony)

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

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

27 **COUNT TWENTY-SIX**
28 **INSURANCE FRAUD**
(NRS 686A.2815, 686A.291 – Category D Felony)

1 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
2 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through
3 February 1, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,
4 abet, solicit, or conspire with another person to present or caused to be presented to an
5 insurer false or misleading information concerning a material fact in support of a claim for
6 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to
7 wit:

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

27 **COUNT TWENTY-SEVEN**
28 **INSURANCE FRAUD**

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

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

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

27 **COUNT TWENTY-EIGHT**
28 **INSURANCE FRAUD**
(NRS 686A.2815, 686A.291 – Category D Felony)

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

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

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

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

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

26
27 **COUNT THIRTY**
28 **INSURANCE FRAUD**
(NRS 686A.2815, 686A.291 – Category D Felony)

1 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
2 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 16, 2011 through
3 February 11, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,
4 abet, solicit, or conspire with another person to present or caused to be presented to an
5 insurer false or misleading information concerning a material fact in support of a claim for
6 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to
7 wit:

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

27 **COUNT THIRTY-ONE**
28 **INSURANCE FRAUD**
(NRS 686A.2815, 686A.291 – Category D Felony)

1 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
2 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through
3 February 20, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist,
4 abet, solicit, or conspire with another person to present or caused to be presented to an
5 insurer false or misleading information concerning a material fact in support of a claim for
6 benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to
7 wit:

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

27 **COUNT THIRTY-TWO**
28 **THEFT**

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

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

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

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

5

6 **COUNT THIRTY-THREE**
THEFT

7 **(NRS 205.0832(1)(c) – Category B 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, without lawful authority, knowingly obtained, or assisted,
11 abetted, solicited, or conspired with another person to obtain, real, personal or intangible
12 property or the services of another person by a material misrepresentation with intent to
13 deprive that person of the property or service, with the value of said property being \$3,500.00
14 or more, to wit:

- 15
- 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 Michael D. Habighorst;
 - 23 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO
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 Habighorst
26 health insurance company, Meritain Health and/or its affiliate(s), by using medical
27 codes that corresponded with services that all codefendants knew they and their
28 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

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, Meritain Health and/or its affiliate(s) paid the defendants and/or their
6 agent(s) \$3,500.00 or more for insurance claims made for services that were never
7 provided to Habighorst.

8
9 **COUNT THIRTY-FOUR**
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 January 7, 2012 through June 5,
13 2012 through March 5, 2012, within Clark County, Nevada, without lawful authority, knowingly
14 attempted to obtain, or attempted to assist, abet, solicit, or conspire with another person 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 Patricia Lavendar;
- 25 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO
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 Lavendar'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 Coleman;

- 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 the insurance claims in the amount of \$3,500.00 or more made for
11 services that were never provided to Lavendar.

12
13 **COUNT THIRTY-FIVE**

14 **ATTEMPT – THEFT**

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

16 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
17 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 29, 2011 through May
18 6, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted to obtain,
19 or 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 \$650 or more, but less than \$3,500.00, 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 Charles G. Ramirez;

- 1 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO
2 knowingly and willfully assisted all of her codefendants in an attempt to obtain said
3 insurance proceeds by, either on her own or by and through her agent(s), billing
4 Ramirez'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 Ramirez;
- 7 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY
8 knowingly and willfully assisted all of his codefendants in an attempt 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 \$650.00 or more, but less than
15 \$3,500.00 made for services that were never provided to Ramirez.

16
17 **COUNT THIRTY-SIX**

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. SIPPIO, on or about October 25, 2011 through June 5,
22 2012, within Clark County, Nevada, without lawful authority, knowingly attempted to obtain, or
23 assisted, abetted, solicited, or conspired with another person in an attempt to obtain, real,
24 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 Terri L. Strahan;
- 6 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO
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 Strahan'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 Strahan;
- 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 Strahan.

21
22 **COUNT THIRTY-SEVEN**

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. SIPPPIO, on or about November 3, 2011 through May
27 28, 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 Carol W. Sullivan;
- 10 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO
11 knowingly and willfully assisted all of her codefendants in an attempt 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 and/or their
23 agent(s) for the insurance claims in the amount of \$3,500.00 or more made for
24 services that were never provided to Sullivan.

25
26 **COUNT THIRTY-EIGHT**

27 **ATTEMPT – THEFT**

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

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

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

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, Sierra Health and Life and/or its affiliate(s) paid the defendants and/or
5 their agent(s) \$3,500.00 or more for insurance claims made for services that were
6 never provided to Blackerby.

7
8 **COUNT FORTY**
9 **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 October 28, 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 Joann Crolli;
- 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 Crolli'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 Crolli;

- 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 Crolli.

12
13 **COUNT FORTY-ONE**
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 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 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
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 attempting 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 Dora Herrman;

- 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 Herrman'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 Herrman;
- 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 Herrman.

16
17 **COUNT FORTY-TWO**
ATTEMPT – THEFT

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

19 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
20 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 24, 2011 through
21 February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted
22 to obtain, or assisted, abetted, solicited, or conspired with another person in attempting 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 \$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 David Johnson;
- 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 Johnson's health insurance company, Sierra Health and Life and/or its affiliate(s),
10 by using medical codes that corresponded with services that all codefendants knew
11 they and their agents and employees were not providing to Johnson;
- 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 insurance claims in the amount of \$3,500.00 or more made for services
20 that were never provided to Johnson.

21
22 **COUNT FORTY-THREE**
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 October 31, 2011 through
26 February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted
27 to obtain, or assisted, abetted, solicited, or conspired with another person in attempting 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 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 Lisa Johnson;
- 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 Johnson's health insurance company, Sierra Health and Life and/or its affiliate(s),
14 by using medical codes that corresponded with services that all codefendants knew
15 they and their agents and employees were not providing to Johnson;
- 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 and/or their
23 agent(s) for insurance claims in the amount of \$3,500.00 or more made for services
24 that were never provided to Johnson.

25 **COUNT FORTY-FOUR**
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 February 16, 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 Beatriz Kremer;
- 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 Kremer'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 Kremer;
- 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 Kremer.

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

COUNT FORTY-SIX
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 September 12, 2011 through December 8, 2011, within Clark County, Nevada, without lawful authority, knowingly attempted to 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 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 Morris;
- 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 Morris' 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 Morris;
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY 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 Morris.

8
9
10 **COUNT FORTY-SEVEN**

11 **THEFT**

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

13 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
14 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through
15 February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained,
16 or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or
17 intangible property or the services of another person by a material misrepresentation with
18 intent to deprive that person of the property or service, with the value of said property being
19 \$3,500.00 or more, to 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 Brian Saffle;
- 27 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO
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 Saffle's health

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

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

13
14 **COUNT FORTY-EIGHT**

15 **THEFT**

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

17 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
18 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through
19 February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained,
20 or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or
21 intangible property or the services of another person by a material misrepresentation with
22 intent to deprive that person of the property or service, with the value of said property being
23 \$650.00 or more but less than \$3,500.00, to wit:

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

- 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 Kendra Saffle;
- 4 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO
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 Saffle's health
7 insurance company, Sierra Health and Life and/or its affiliate(s), by using medical
8 codes that corresponded with services that all codefendants knew they and their
9 agents and employees were not providing to Saffle;
- 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) \$650.00 or more but less than \$3,500.00 or more for insurance claims
18 made for services that were never provided to Saffle.

20 **COUNT FORTY-NINE**

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. SIPPIO, 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 an attempt 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 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 Denise Whipple;
- 8 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO
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 Whipple'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 Whipple;
- 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) for insurance claims in the amount of \$3,500.00 or more made for services
22 that were never provided to Whipple.

23
24 **COUNT FIFTY**
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. SIPPIO, on or about October 24, 2011 through
February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted

1 to obtain, or assisted, abetted, solicited, or conspired with another person in an attempt to
2 obtain, real, personal or intangible property or the services of another person by a material
3 misrepresentation with intent to deprive that person of the property or service, with the value
4 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 Timothy Whipple;
- 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 Whipple's 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 Whipple;
- 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 Whipple.

27
28 **COUNT FIFTY-ONE**
ATTEMPT – THEFT

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

1
2 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
3 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about January 11, 2012 through April
4 13, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted to
5 obtain, or assisted, abetted, solicited, or conspired with another person in an attempt to
6 obtain, real, personal or intangible property or the services of another person by a material
7 misrepresentation with intent to deprive that person of the property or service, with the value
8 of said property being \$650 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 Terry Coffing;
 - 17 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO
18 knowingly and willfully assisted all of her codefendants in attempting to obtain said
19 insurance proceeds by, either on her own or by and through her agent(s), billing
20 Coffing's health insurance company, Aetna and/or its affiliate(s), by using medical
21 codes that corresponded with services that all codefendants knew they and their
22 agents and employees were not providing to Coffing;
 - 23 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY
24 knowingly and willfully assisted all of his codefendants in attempting to obtain said
25 insurance proceeds by providing his coconspirators with his National Provider
26 Identification number so that they could use it to bill insurers for services that he
27 (MASSEY) knew he, his codefendants, and their agents and employees did not
28 provide to their clients;

- 1 • Aetna and/or its affiliate(s) did not pay the defendants and/or their agent(s) for
2 insurance claims in the amount of \$650.00 or more but less than \$3,500.00 made
3 for services that were never provided to Coffing.

4
5 **COUNT FIFTY-TWO**
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 8, 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 Amy Dahlstrom;
- 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 Dahlstrom's health insurance company, Aetna 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 Dahlstrom;
- 28 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY
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 Dahlstrom.

8 **COUNT FIFTY-THREE**
9 **THEFT**

10 **(NRS 205.0832(1)(c) – Category B 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 January 2, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained, or
14 assisted, abetted, solicited, or conspired with another person to obtain, real, personal or
15 intangible property or the services of another person by a material misrepresentation with
16 intent to deprive that person of the property or service, with the value of said property being
17 \$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 Monica Fleming;
- 25 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO
26 knowingly and willfully assisted all of her codefendants in obtaining said insurance
27 proceeds by, either on her own or by and through her agent(s), billing Fleming's
28 health insurance company, Aetna and/or its affiliate(s), by using medical codes that

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

- 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; and
- 9 • As a result, Aetna and/or its affiliate(s) paid the defendants and/or their agent(s)
10 \$3,500.00 or more for insurance claims made for services that were never provided
11 to Fleming.

12
13
14 **COUNT FIFY-FOUR**
THEFT

15 **(NRS 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 September 12, 2011 through
18 December 14, 2012, within Clark County, Nevada, without lawful authority, knowingly
19 obtained, or assisted, abetted, solicited, or conspired with another person 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 \$650.00 or more but less than \$3,500.00, to wit:

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

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

16
17 **COUNT FIFTY-FIVE**
ATTEMPT - THEFT

18 **(NRS 193.330, 205.0832(1)(c) - Category C 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 20, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted
22 to 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 \$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 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 Jennifer Plinio;
- 6 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO
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 Plinio'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 Plinio;
- 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 \$3,500.00 or more made for services that were
20 never provided to Plinio.

21
22 **COUNT FIFTY-SIX**
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. SIPPPIO, on or about September 12, 2011 through
26 February 6, 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 Brenna Schrader;
- 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 Schrader's health insurance company, Aetna 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 Schrader;
- 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; and
- 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 Schrader.

25
26 **COUNT FIFTY-SEVEN**

27 **THEFT**

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

1 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
2 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through
3 February 1, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained,
4 or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or
5 intangible property or the services of another person by a material misrepresentation with
6 intent to deprive that person of the property or service, with the value of said property being
7 \$3,500.00 or more, to wit:

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

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, Aetna and/or its affiliate(s) paid the defendants and/or their agent(s)
6 \$3,500.00 or more for insurance claims made for services that were never provided
7 to Sheffield.

8
9
10 **COUNT FIFTY-NINE**
THEFT

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

12 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
13 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through
14 November 23, 2011, within Clark County, Nevada, without lawful authority, knowingly
15 obtained, or assisted, abetted, solicited, or conspired with another person 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 \$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 Nicole Gervasi;
- 25 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO
26 knowingly and willfully assisted all of her codefendants in obtaining said insurance
27 proceeds by, either on her own or by and through her agent(s), billing Gervasi's
28 health insurance company, Golden Rule 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 Gervasi;

- 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;
- 9 • As a result, Golden Rule and/or its affiliate(s) paid the defendants and/or their
10 agent(s) \$3,500.00 or more for insurance claims made for services that were never
11 provided to Gervasi.

12 **COUNT SIXTY**
13 **THEFT**

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

15 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
16 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through April
17 3, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained, or
18 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
\$650.00 or more but less than \$3,500.00, to 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 Dannine Budinger;

- 1 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO
2 knowingly and willfully assisted all of her codefendants in obtaining said insurance
3 proceeds by, either on her own or by and through her agent(s), billing Budinger's
4 health insurance company, Cigna and/or its affiliate(s), by using medical codes that
5 corresponded with services that all codefendants knew they and their agents and
6 employees were not providing to Budinger;
- 7 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY
8 knowingly and willfully assisted all of his codefendants in obtaining said insurance
9 proceeds by providing his coconspirators with his National Provider Identification
10 number so that they could use it to bill insurers for services that he (MASSEY) knew
11 he, his codefendants, and their agents and employees did not provide to their
12 clients;
- 13 • As a result, Cigna and/or its affiliate(s) paid the defendants and/or their agent(s)
14 \$650.00 or more but less than \$3,500.00 for insurance claims made for services
15 that were never provided to Budinger.

16
17 **COUNT SIXTY-ONE**
18 **THEFT**

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

20 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
21 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 16, 2011 through
22 February 11, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained,
23 or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or
24 intangible property or the services of another person by a material misrepresentation with
25 intent to deprive that person of the property or service, with the value of said property being
26 \$650.00 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 Holly Mcrae;
- 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 Mcrae's
9 health insurance company, Cigna 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 Mcrae;
- 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, Cigna and/or its affiliate(s) paid the defendants and/or their agent(s)
19 \$650.00 or more but less than \$3,500.00 for insurance claims made for services
20 that were never provided to Mcrae.

21 **COUNT SIXTY-TWO**
22 **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 February 20, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained,
27 or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or
28 intangible property or the services of another person by a material misrepresentation with

1 intent to deprive that person of the property or service, with the value of said property being
2 \$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 Rachel Zurcher;
- 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 Zurcher's
13 health insurance company, Cigna and/or its affiliate(s), by using medical codes that
14 corresponded with services that all codefendants knew they and their agents and
15 employees were not providing to Zurcher;
- 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, Cigna and/or its affiliate(s) paid the defendants and/or their agent(s)
23 \$3,500.00 or more for insurance claims made for services that were never provided
24 to Mcrae.

25
26 **COUNT SIXTY-THREE**
27 **PRACTICING OR OFFERING TO PRACTICE NURSING WITHOUT LICENSE**
28 **(NRS 632.315 – Category D Felony)**

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

10
11 **COUNT SIXTY-FOUR**
12 **PRACTICING OR OFFERING TO PRACTICE NURSING WITHOUT LICENSE**
13 **(NRS 632.315 – Category D Felony)**

14 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, and
15 CHARLENE P. SIPPPIO, on or about September 12, 2011 through July 2, 2012, within Clark
16 County, Nevada, did practice or offer to practice nursing in the State of Nevada or use or
17 assist, abet, solicit, or conspire with another person to use any title, abbreviation, sign, card or
18 device to indicate that said other person was a practicing nursing in this State, without having
19 been licensed pursuant to the provisions of chapter 632 of the Nevada Revised Statutes, to
20 wit: Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, and
21 CHARLENE P. SIPPPIO solicited and conspired with FRANK MASSEY to provide them with
22 the National Provider Identification number he (MASSEY) obtained as a California-licensed
23 nurse in order to allow the defendants and/or their agent(s) to submit insurance claims that
24 included false representations that MASSEY was licensed to provide, and was in fact
25 providing, nursing services in the State of Nevada.

26 **COUNT SIXTY-FIVE**
27 **RACKETEERING**
28 **(NRS 207.400(1)(c) – Category B Felony)**

1 Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL
2 FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through July
3 2, 2012, while employed by or associated with an enterprise (i.e., any natural person, sole
4 proprietorship, corporation, business trust or other legal entity; and any union, association or
5 other group of persons associated in fact although not a legal entity) conducted or
6 participated, directly or indirectly, in: (i) the affairs of the enterprise through racketeering
7 activity (i.e., engaging in at least two crimes related to racketeering that have the same or
8 similar pattern, intents, results, accomplices, victims, or methods of commission, or are
9 otherwise interrelated by distinguishing characteristics and are not isolated incidents, with at
10 least one of the incidents occurring after July 1, 1983, and the last of the incidents occurring
11 within five years after a prior commission of a crime related to racketeering), or (ii)
12 racketeering activity through the affairs of the enterprise, to wit:

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

15 **The Enterprise**

- 16 2. On or about September 12, 2011 through July 2, 2012, Defendants RICHARD
17 RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and
18 CHARLENE P. SIPPIO conducted business together, which at times operated
19 under no specific business name, and at other times, operated under business
20 names including Human Performance Enhancement and/or My Wellness Expert;
- 21 3. RUPPERT and AZOULAY, either personally or through their agent(s), created
22 and/or managed said business;
- 23 4. RUPPERT and AZOULAY, either personally or through their agent(s), provided said
24 business with physical locations, including 6012 Topaz Street, Suite #8, Las Vegas,
25 NV 89120, and Canyon Gate Country Club, located at 2001 Canyon Gate Drive,
26 Las Vegas, NV 89117, where the business was conducted;
- 27 5. Said business provided exercise and personal training services to its clients;
- 28

1 6. No one who worked for said business was licensed to provide physical therapy or
2 other medical services in the State of Nevada;

3 7. Said business did not lawfully provide physical therapy or medical services in the
4 State of Nevada;

5 **Racketeering Activity**

6 8. As described in greater detail in counts one through sixty-two, which charge
7 Defendants with multiple counts of theft and insurance fraud, at the direction of
8 RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO knowingly and
9 willfully assisted all of her codefendants in obtaining said insurance proceeds by,
10 either on her own or by and through her agent(s), billing the health insurance
11 companies, including Meritain Health, Sierra Health and Life, Aetna, Golden Rule,
12 Cigna, and/or their affiliate(s), of thirty-one of said business' clients, by using
13 medical codes that corresponded with services, such as physical therapy, that all
14 codefendants knew they and their agents and employees were not providing to their
15 clients;

16 9. At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY,
17 at all relevant times knowingly and willfully assisted all of his codefendants in
18 obtaining said insurance proceeds by providing his coconspirators with his National
19 Provider Identification number so that they could use it to bill said insurance
20 companies for services, including physical therapy, that he (MASSEY) and his
21 codefendant knew he, his codefendants, and their agents and employees did not
22 provide to their clients;

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

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

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

4
5 All of which is contrary to the form, force, and effect of the statutes in such cases made
6 and provided, and against the peace and dignity of the State of Nevada.

7
8 DATED this 5th day of February, 2015.

9 CATHERINE CORTEZ MASTO
10 Attorney General

11 By: Michael C. Kovac
12 MICHAEL C. KOVAC, ESQ.
13 Deputy Attorney General
14 Nevada Bar No. 11177

15 ENDORSEMENT: A True Bill

16 By:

[Signature]
17 Foreperson, Clark County Grand Jury
18 GJ# 14BGJ017A-D
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