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Office of the Attorney General
555 East Washington Avenue, Suite 3900
Las Vegas, Nevada 89101

DISTRICT COURT

CLARK COUNTY, STATE OF NEVADA

STATE OF NEVADA, Plaintiff, v. RICHARD RAYMOND RUPPERT, #0623258, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, AND **CHARLENE P. SIPPIO**, Defendant(s).	Case No.: C-15-304178-4 Dept. No.: VI

INDICTMENT

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

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DISTRICT COURT

CLARK COUNTY, STATE OF NEVADA

STATE OF NEVADA, Plaintiff, v. RICHARD RAYMOND RUPPERT, #0623258, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, AND CHARLENE P. SIPPIO, Defendant(s).	Case No.: Dept. No.:

INDICTMENT

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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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 Herrman; and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 12, 2011 through 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 insurer false or misleading information concerning a material fact in support of a claim for benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to wit:

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- Defendants RUPPERT and AZOULAY, either on their own or by and through their agent(s), formed and/or operated a business for the purpose of knowingly and willfully submitting false insurance claims in order to obtain insurance proceeds to which they were not lawfully entitled;
- 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 obtaining 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; and
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in obtaining said insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill insurers for services that he (MASSEY) knew he, his codefendants, and their agents and employees did not provide to their clients.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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November 23, 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 insurer false or misleading information concerning a material fact in support of a claim for benefits made under a policy of insurance issued pursuant to the Nevada Insurance Act, to wit:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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COUNT THIRTY-THREE
THEFT
(NRS 205.0832(1)(c) – Category B Felony)

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

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

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

COUNT THIRTY-FOUR
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 January 7, 2012 through June 5, 2012 through March 5, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted to obtain, or attempted to assist, abet, solicit, or conspire with another person to obtain, real, personal or intangible property or the services of another person by a material misrepresentation with intent to deprive that person of the property or service, with the value of said property being $3,500.00 or more, to wit:

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

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

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

COUNT THIRTY-FIVE
ATTEMPT – THEFT
(NRS 193.330, 205.0832(1)(c) – Category D Felony or Gross Misdemeanor)

Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and CHARLENE P. SIPPIO, on or about September 29, 2011 through May 6, 2012, 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 $650 or more, but less than $3,500.00, to wit:

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

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

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

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COUNT THIRTY-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 October 25, 2011 through June 5, 2012, 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 an attempt to obtain insurance proceeds to which they were not lawfully entitled;
- RUPPERT and AZOULAY, either on their own or by and through their agent(s) acting at the direction of RUPPERT and AZOULAY, obtained the health insurance information of an individual named Terri L. Strahan;

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

COUNT THIRTY-SEVEN
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 November 3, 2011 through May 28, 2012, 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

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

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

COUNT THIRTY-EIGHT
ATTEMPT – THEFT
(NRS 193.330, 205.0832(1)(c) – Category C Felony)

Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 26, 2011 through May 22, 2012, 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

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

- Defendants RUPPERT and AZOULAY, either on their own or by and through their agent(s), formed and/or operated a business for the purpose of knowingly and willfully submitting false insurance claims in an attempt to obtain insurance proceeds to which they were not lawfully entitled;
- RUPPERT and AZOULAY, either on their own or by and through their agent(s) acting at the direction of RUPPERT and AZOULAY, obtained the health insurance information of an individual named Cindy B. Sullivan;
- 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 Sullivan's health insurance company, Sierra Health and Life and/or its affiliate(s), by using medical codes that corresponded with services that all codefendants knew they and their agents and employees were not providing to Sullivan;
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in attempting to obtain said insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill insurers for services that he (MASSEY) knew he, his codefendants, and their agents and employees did not provide to their clients;
- Sierra Health and Life and/or its affiliate(s) did not pay the defendants and/or their agent(s) for insurance claims in the amount of $3,500.00 or more made for services that were never provided to Sullivan.

COUNT THIRTY-NINE
THEFT
(NRS 205.0832(1)(c) – Category B Felony)

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

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February 14, 2012, within Clark County, Nevada, without lawful authority, knowingly obtained, or assisted, abetted, solicited, or conspired with another person to obtain, real, personal or intangible property or the services of another person by a material misrepresentation with intent to deprive that person of the property or service, with the value of said property being $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 Shannon Blackerby;
- At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO knowingly and willfully assisted all of her codefendants in obtaining said insurance proceeds by, either on her own or by and through her agent(s), billing Blackerby's health insurance company, Sierra Health and Life and/or its affiliate(s), by using medical codes that corresponded with services that all codefendants knew they and their agents and employees were not providing to Blackerby;
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in obtaining said insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill insurers for services that he (MASSEY) knew he, his codefendants, and their agents and employees did not provide to their clients;
- As a result, Sierra Health and Life and/or its affiliate(s) paid the defendants and/or their agent(s) $3,500.00 or more for insurance claims made for services that were never provided to Blackerby.

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

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

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

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

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

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

- Defendants RUPPERT and AZOULAY, either on their own or by and through their agent(s), formed and/or operated a business for the purpose of knowingly and willfully submitting false insurance claims in attempting 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 Dora Herrman;
- 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 Hermann's health insurance company, Sierra Health and Life and/or its affiliate(s), by using medical codes that corresponded with services that all codefendants knew they and their agents and employees were not providing to Herrman;
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in attempting to obtain said

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

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

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

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

- Defendants RUPPERT and AZOULAY, either on their own or by and through their agent(s), formed and/or operated a business for the purpose of knowingly and willfully submitting false insurance claims in an attempt to obtain insurance proceeds to which they were not lawfully entitled;
- RUPPERT and AZOULAY, either on their own or by and through their agent(s) acting at the direction of RUPPERT and AZOULAY, obtained the health insurance information of an individual named David Johnson;
- 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 Johnson's health insurance company, Sierra Health and Life and/or its affiliate(s),

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

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

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

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

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

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

COUNT FORTY-FOUR
THEFT
(NRS 205.0832(1)(c) – Category B Felony)

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

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

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- 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 Beatriz Kremer;
- At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO knowingly and willfully assisted all of her codefendants in obtaining said insurance proceeds by, either on her own or by and through her agent(s), billing Kremer's health insurance company, Sierra Health and Life and/or its affiliate(s), by using medical codes that corresponded with services that all codefendants knew they and their agents and employees were not providing to Kremer;
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in obtaining said insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill insurers for services that he (MASSEY) knew he, his codefendants, and their agents and employees did not provide to their clients;
- As a result, Sierra Health and Life and/or its affiliate(s) paid the defendants and/or their agent(s) $3,500.00 or more for insurance claims made for services that were never provided to Kremer.

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

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

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

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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 insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill insurers for services that he (MASSEY) knew he, his codefendants, and their agents and employees did not provide to their clients;
- Sierra Health and Life and/or its affiliate(s) did not pay the defendants and/or their agent(s) for insurance claims in the amount of $3,500.00 or more made for services that were never provided to Morris.

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COUNT FORTY-SEVEN
THEFT
(NRS 205.0832(1)(c) – Category B Felony)

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

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

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

COUNT FORTY-EIGHT
THEFT
(NRS 205.0832(1)(c) – Category C Felony)

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

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

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

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

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

Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 24, 2011 through February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted to obtain, or assisted, abetted, solicited, or conspired with another person in 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 Denise Whipple;
- 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 Whipple's health insurance company, Sierra Health and Life and/or its affiliate(s), by

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

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

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

Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and CHARLENE P. SIPPIO, on or about October 24, 2011 through February 16, 2012, within Clark County, Nevada, without lawful authority, knowingly attempted to obtain, or assisted, abetted, solicited, or conspired with another person in 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 Timothy Whipple;

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

COUNT FIFTY-ONE
ATTEMPT – THEFT
(NRS 205.0832(1)(c) – Category D Felony or Gross Misdemeanor)

Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and CHARLENE P. SIPPIO, on or about January 11, 2012 through April 13, 2012, 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 $650 or more but less than $3,500.00, to wit:

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

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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 Terry Coffing;
- 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 Coffing's health insurance company, Aetna and/or its affiliate(s), by using medical codes that corresponded with services that all codefendants knew they and their agents and employees were not providing to Coffing;
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in attempting to obtain said insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill insurers for services that he (MASSEY) knew he, his codefendants, and their agents and employees did not provide to their clients;
- Aetna and/or its affiliate(s) did not pay the defendants and/or their agent(s) for insurance claims in the amount of $650.00 or more but less than $3,500.00 made for services that were never provided to Coffing.

COUNT FIFTY-TWO
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 February 8, 2012, 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

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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 Amy Dahlstrom;
- 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 Dahlstrom's health insurance company, Aetna and/or its affiliate(s), by using medical codes that corresponded with services that all codefendants knew they and their agents and employees were not providing to Dahlstrom;
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in attempting to obtain said insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill insurers for services that he (MASSEY) knew he, his codefendants, and their agents and employees did not provide to their clients;
- Aetna and/or its affiliate(s) did not pay the defendants and/or their agent(s) for insurance claims in the amount of $3,500.00 or more made for services that were never provided to Dahlstrom.

COUNT FIFTY-THREE
THEFT
(NRS 205.0832(1)(c) – Category B Felony)

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

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

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

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COUNT FIFY-FOUR
THEFT
(NRS 205.0832(1)(c) – Category C Felony)

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

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

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

COUNT FIFTY-FIVE
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 February 20, 2012, 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 Jennifer Plinio;
- 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 Plinio's health insurance company, Aetna and/or its affiliate(s), by using medical codes that corresponded with services that all codefendants knew they and their agents and employees were not providing to Plinio;
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in attempting to obtain said

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

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

COUNT FIFTY-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 February 6, 2012, 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 Brenna Schrader;
- 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 Schrader's health insurance company, Aetna and/or its affiliate(s), by using medical

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

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

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COUNT FIFTY-SEVEN
THEFT
(NRS 205.0832(1)(c) – Category B Felony)

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

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

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

COUNT FIFTY-EIGHT
THEFT
(NRS 205.0832(1)(c) – Category B Felony)

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

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

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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 Megan Sheffield;
- At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO knowingly and willfully assisted all of her codefendants in obtaining said insurance proceeds by, either on her own or by and through her agent(s), billing Sheffield health insurance company, Aetna and/or its affiliate(s), by using medical codes that corresponded with services that all codefendants knew they and their agents and employees were not providing to Scheffield;
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in obtaining said insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill insurers for services that he (MASSEY) knew he, his codefendants, and their agents and employees did not provide to their clients;
- As a result, Aetna and/or its affiliate(s) paid the defendants and/or their agent(s) $3,500.00 or more for insurance claims made for services that were never provided to Sheffield.

COUNT FIFTY-NINE
THEFT
(NRS 205.0832(1)(c) – Category B Felony)

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

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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 Nicole Gervasi;
- At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO knowingly and willfully assisted all of her codefendants in obtaining said insurance proceeds by, either on her own or by and through her agent(s), billing Gervasi's health insurance company, Golden Rule 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 Gervasi;
- At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY knowingly and willfully assisted all of his codefendants in obtaining said insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill insurers for services that he (MASSEY) knew he, his codefendants, and their agents and employees did not provide to their clients;
- As a result, Golden Rule and/or its affiliate(s) paid the defendants and/or their agent(s) $3,500.00 or more for insurance claims made for services that were never provided to Gervasi.

COUNT SIXTY
THEFT
(NRS 205.0832(1)(c) – Category C Felony)

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

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

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

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COUNT SIXTY-ONE
THEFT
(NRS 205.0832(1)(c) – Category C Felony)

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

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

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

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

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

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

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

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

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

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

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

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

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

COUNT SIXTY-FIVE
RACKETEERING
(NRS 207.400(1)(c) – Category B Felony)

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

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

The Enterprise

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

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3. RUPPERT and AZOULAY, either personally or through their agent(s), created and/or managed said business;

4. RUPPERT and AZOULAY, either personally or through their agent(s), provided said business with physical locations, including 6012 Topaz Street, Suite #8, Las Vegas, NV 89120, and Canyon Gate Country Club, located at 2001 Canyon Gate Drive, Las Vegas, NV 89117, where the business was conducted;

5. Said business provided exercise and personal training services to its clients;

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

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

Racketeering Activity

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

9. At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY, at all relevant times knowingly and willfully assisted all of his codefendants in obtaining said insurance proceeds by providing his coconspirators with his National Provider Identification number so that they could use it to bill said insurance companies for services, including physical therapy, that he (MASSEY) and his

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

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

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

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

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

DATED this _____ day of February, 2015.

CATHERINE CORTEZ MASTO
Attorney General

By: _____
MICHAEL C. KOVAC, ESQ.
Deputy Attorney General
Nevada Bar No. 11177

ENDORSEMENT: A True Bill

By: _____
Foreperson, Clark County Grand Jury
GJ# 14BGJ017A-D

WITNESS LIST:

1. Phyllis Rost
2. Linda Rosel
3. Cobette Harber

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

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