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CLERK OF THE COURT

9 **DISTRICT COURT**
10 **CLARK COUNTY, STATE OF NEVADA**

11 STATE OF NEVADA,

12 Plaintiff,

13 v.

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

18 Defendant(s).

Case No.: C-15-304178-2

Dept. No.: VI

19 **INDICTMENT**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

9
10 **COUNT TEN**
11 **INSURANCE FRAUD**
12 **(NRS 686A.2815, 686A.291 – Category D Felony)**

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

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

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.

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;

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

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

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

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

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

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

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

18
19 **COUNT FIFTEEN**
INSURANCE FRAUD

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

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

- 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

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

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,

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

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

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

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

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

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

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

24
25 **COUNT TWENTY-ONE**
26 **INSURANCE FRAUD**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

COUNT THIRTY-THREE
THEFT

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

Defendants RICHARD RAYMOND RUPPERT, SHY SHALOM AZOULAY, DANIEL FRANK MASSEY, and CHARLENE P. 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;

- 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

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),

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

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

12
13 **COUNT THIRTY-SIX**
14 **ATTEMPT – THEFT**

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

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

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

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

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

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.

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;

- 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 Herrman'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

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),

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

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

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

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

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

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

20 **COUNT FORTY-FIVE**

21 **ATTEMPT – THEFT**

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

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

- 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

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

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

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

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

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

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

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

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

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

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

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

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

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their
7 agent(s), formed and/or operated a business for the purpose of knowingly and
8 willfully submitting false insurance claims in order to obtain insurance proceeds to
9 which they were not lawfully entitled;
 - 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance
12 information of an individual named Monica Fleming;
 - 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPIO
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance
15 proceeds by, either on her own or by and through her agent(s), billing Fleming's
16 health insurance company, Aetna and/or its affiliate(s), by using medical codes that
17 corresponded with services that all codefendants knew they and their agents and
18 employees were not providing to Fleming;
 - 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance
21 proceeds by providing his coconspirators with his National Provider Identification
22 number so that they could use it to bill insurers for services that he (MASSEY) knew
23 he, his codefendants, and their agents and employees did not provide to their
24 clients; and
 - 25 • As a result, Aetna and/or its affiliate(s) paid the defendants and/or their agent(s)
26 \$3,500.00 or more for insurance claims made for services that were never provided
27 to Fleming.
- 28

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;

- 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

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

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

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

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

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

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

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

- 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

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

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

21
22 **COUNT FIFTY-NINE**
THEFT

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

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

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

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

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

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

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

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

- 6 • Defendants RUPPERT and AZOULAY, either on their own or by and through their
7 agent(s), formed and/or operated a business for the purpose of knowingly and
8 willfully submitting false insurance claims in order to obtain insurance proceeds to
9 which they were not lawfully entitled;
- 10 • RUPPERT and AZOULAY, either on their own or by and through their agent(s)
11 acting at the direction of RUPPERT and AZOULAY, obtained the health insurance
12 information of an individual named Dannine Budinger;
- 13 • At the direction of RUPPERT and AZOULAY, defendant CHARLENE P. SIPPPIO
14 knowingly and willfully assisted all of her codefendants in obtaining said insurance
15 proceeds by, either on her own or by and through her agent(s), billing Budinger's
16 health insurance company, Cigna and/or its affiliate(s), by using medical codes that
17 corresponded with services that all codefendants knew they and their agents and
18 employees were not providing to Budinger;
- 19 • At the direction of RUPPERT and AZOULAY, defendant DANIEL FRANK MASSEY
20 knowingly and willfully assisted all of his codefendants in obtaining said insurance
21 proceeds by providing his coconspirators with his National Provider Identification
22 number so that they could use it to bill insurers for services that he (MASSEY) knew
23 he, his codefendants, and their agents and employees did not provide to their
24 clients;
- 25 • As a result, Cigna and/or its affiliate(s) paid the defendants and/or their agent(s)
26 \$650.00 or more but less than \$3,500.00 for insurance claims made for services
27 that were never provided to Budinger.
- 28

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

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

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

6
7 **COUNT SIXTY-FIVE**
8 **RACKETEERING**

9 **(NRS 207.400(1)(c) – Category B Felony)**

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

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

24 **The Enterprise**

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

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

12 **Racketeering Activity**

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

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;

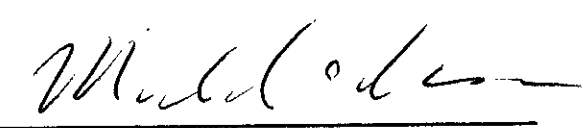
Property Derived from, Realized through, or Used or Intended to Be Used in the Course of the Unlawful Acts

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.

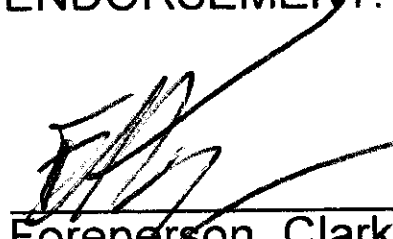
All of which is contrary to the form, force, and effect of the statutes in such cases made and provided, and against the peace and dignity of the State of Nevada.

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