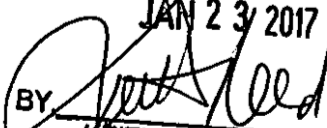


ORIGINAL

FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT

JAN 23 2017

BY 
KEITH REED, DEPUTY

1 AIND
2 ADAM PAUL LAXALT
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8 DISTRICT COURT
9 CLARK COUNTY, NEVADA

11 STATE OF NEVADA,
12 Plaintiff,

Case No.: C-304178-1
Dept. No.: VI

13 v.

14 RICHARD RAYMOND RUPPERT,
15 Defendant.

17 AMENDED INDICTMENT

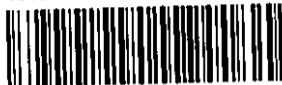
18 The above named defendant, RICHARD RAYMOND RUPPERT, is accused by the Clark County
19 Grand Jury of the crimes(s) of one (1) count of MULTIPLE TRANSACTIONS INVOLVING FRAUD
20 OR DECEIT IN THE COURSE OF AN ENTERPRISE OR OCCUPATION, a category "B" felony, in
21 violation of NRS 205.377, and one (1) count of INSURANCE FRAUD, a category "D" felony, in
22 violation of NRS 686A.2815, in Clark County, State of Nevada as follows:

23 **COUNT I**
24 **MULTIPLE TRANSACTIONS INVOLVING FRAUD OR DECEIT IN THE COURSE OF AN**
25 **ENTERPRISE OR OCCUPATION**
26 **Category "B" Felony - NRS 205.377**

26 That the Defendant, RICHARD RAYMOND RUPPERT, in the County of Clark, State of Nevada,
27 did, in the course of an enterprise or occupation, knowingly and with the intent to defraud, engage in an

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C-15-304178-1
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Amended Indictment
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3

1 act, practice or course of business or employ a device, scheme or artifice which operates or would operate
2 as a fraud or deceit upon a person by means of a false representation or omission of a material fact that:

3 (a) he knew to be false or omitted;

4 (b) he intended another to rely on; and

5 (c) resulted in a loss to any person who relied on the false representation or omission,

6 in at least two transactions that had the same or similar pattern, intents, results, accomplices, victims or
7 methods of commission, or were otherwise interrelated by distinguishing characteristics and were not
8 isolated incidents within 4 years and in which the aggregate loss or intended loss was more than \$650, to
9 wit:

10 On or about September 12, 2011 through July 2, 2012, RUPPERT either personally or through one or
11 more agent(s) or employee(s), in the course of an enterprise doing business as Human Performance
12 Enhancement and/or My Wellness Expert, knowingly and with the intent to defraud, employed a scheme
13 upon insurance companies Aetna, Cigna, Golden Rule, Health Plan of Nevada, Meritain, United
14 Healthcare, and Anthem Blue Cross and Blue Shield, whereby he billed said insurance companies for
15 medical services that he knew were never provided, intending that said insurance companies rely on his
16 misrepresentations that said services were provided, resulting in a loss of more than \$650 to said insurance
17 companies.

18 All of which constitutes the crime of MULTIPLE TRANSACTIONS INVOLVING FRAUD OR
19 DECEIT IN THE COURSE OF AN ENTERPRISE OR OCCUPATION, a category "B" felony, in
20 violation NRS 205.377.

21 **COUNT II**
22 **INSURANCE FRAUD**
23 **Category "D" Felony - NRS 686A.2815**

24 That the Defendant, RICHARD RAYMOND RUPPERT, in the County of Clark, State of Nevada,
25 did knowingly and willfully present or cause to be presented one or more statement(s) as a part of, or in
26 support of, a claim for payment or other benefits under a policy of insurance, with knowledge that the
27 statement concealed or omitted facts, or contained false or misleading information concerning any fact
28 material to that claim, to wit:

28 ///

1 On or about September 12, 2011 through July 2, 2012, RUPPERT either personally or through one or
2 more agent(s) or employee(s), knowingly and willfully, and in support of claims for payment under
3 policies of insurance, informed insurance companies Aetna, Cigna, Golden Rule, Health Plan of Nevada,
4 Meritain, United Healthcare, and Anthem Blue Cross and Blue Shield that their policy holders had
5 received medical services, when RUPPERT knew that said services were never provided.

6 All of which constitutes the crime of INSURANCE FRAUD, a category "D" felony, in violation NRS
7 686A.2815.

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

10 DATED this 23 day of January 2017.

11 SUBMITTED BY
12 ADAM PAUL LAXALT
13 Attorney General

14 By: Chelsea Kallal for
15 Michael C. Kovac, Bar No. 11177
16 Senior Deputy Attorney General
17 Attorneys for the State of Nevada

18 ENDORSEMENT: A True Bill

19 By: _____
20 Foreperson, Clark County Grand Jury
21 GJ# _____
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