

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:25-cr-309-WFJ-CPT  
18 U.S.C. § 371

GREISYS CUELLAR-HERNANDEZ

**INFORMATION**

The United States Attorney charges:

**COUNT ONE**  
**(Conspiracy to Commit Wire Fraud)**

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**A. Introduction**

At times material to this Information:

1. GREISYS CUELLAR-HERNANDEZ, a resident of Tampa, Florida, was an employee of Clinic #1, whose duties purportedly included completing paperwork for therapy and maintaining patient records for certain patients, among other duties. In reality, CUELLAR-HERNANDEZ contributed to the filing of fraudulent insurance claims for staged car accidents resulting in multiple payouts by insurance companies to Clinic #1.

2. Clinic #1, a physical rehabilitation facility in Tampa, Florida, provided medical care to individuals involved in car accidents. Clinic #1 maintained a bank account at Financial Institution #2.

3. Insurance Company #1, headquartered in North Carolina, provided insurance to customers throughout the United States. Insurance Company #1 maintained a bank account at Financial Institution #1.

4. Financial Institution #1, headquartered in New York, had computer servers used for processing financial transactions, which servers were located outside the State of Florida.

5. Financial Institution #2, headquartered in New Jersey, had computer servers used for processing financial transactions, which were servers were located outside the State of Florida.

**B. The Conspiracy**

6. Beginning at least as early as in or about January 2022 and continuing through at least in or about May 2023, in the Middle District of Florida and elsewhere, the defendant,

GREISYS CUELLAR-HERNANDEZ,

did willfully and knowingly combine, conspire, confederate and agree with others, both known and unknown to the United States Attorney, to commit wire fraud, in violation of 18 U.S.C. § 1343.

**C. Manner and Means of the Conspiracy**

7. The manner and means by which the defendant sought to accomplish the conspiracy to defraud included, among others, the following:

a. It was part of the conspiracy that the coconspirators would and did recruit, and cause to be recruited, individuals to stage traffic crashes so that fraudulent insurance claims could be filed.

b. It was further a part of the conspiracy that the recruited individuals would and did file, and caused to be filed, police reports relating to the staged traffic crashes.

c. It was further a part of the conspiracy that the coconspirators would and did direct, and cause to be directed, the recruited individuals to Clinic #1 to be evaluated for injuries from the staged traffic crashes.

d. It was further a part of the conspiracy that doctor(s) at Clinic #1 would and did perform, and cause to be performed, evaluations on the recruited individuals in order to diagnose injuries and prescribe future treatments. In some instances, no evaluation or treatments were performed at all, however, diagnoses were still generated and insurance claims were still filed.

e. It was further a part of the conspiracy that the recruited individuals would and did sign multiple blank treatment forms during a single visit so that multiple fraudulent claims could be submitted on their behalf.

f. It was further a part of the conspiracy that the coconspirators would and did direct the recruited individuals to report, and cause to be reported on insurance claims, multiple physical injuries and significant levels of pain throughout their bodies when the recruited individuals then and there well knew the reports to be untrue.

g. It was further a part of the conspiracy that doctor(s) at Clinic #1 would and did complete, and cause to be completed, medical forms with prescriptions for durable medical equipment based on the reported fake injuries.

h. It was further a part of the conspiracy that the defendant and coconspirators would and did submit, and cause to be submitted, via United States Postal Service the medical forms containing false information to various insurance companies for reimbursements.

i. It was further a part of the conspiracy that the defendant and coconspirators would and did receive, and cause to be received, insurance payments, via checks, for the prescribed services and equipment ordered by the doctor(s).

j. It was further part of the conspiracy that the defendant and coconspirators would and did deposit each check at a financial institution causing the funds to be transferred, via interstate wire, from each insurance company's financial institution to accounts controlled by the coconspirators.

k. It was further a part of the conspiracy that the defendant and coconspirators would and did compensate, and cause to be compensated, doctor(s) and recruited individuals for their role in the fraudulent scheme.

l. It was further a part of the conspiracy that the defendant and coconspirators would and did use the fraud proceeds to further this fraudulent scheme, and otherwise for their personal enrichment.

m. It was further a part of the conspiracy that the defendant and coconspirators would and did perform acts and make statements to misrepresent, hide and conceal, and cause to be misrepresented, hidden and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

**D. Overt Act**

8. In furtherance of the conspiracy, and to effect its objects, the defendant and coconspirators committed the following overt act, among others, in the Middle District of Florida, and elsewhere:

a. On or about April 7, 2023, the defendant and coconspirators caused an interstate transfer of funds from Insurance Company #1's account ending in -9395 at Financial Institution #1 to Clinic #1's account ending in -4822 at Financial Institution #2.

In violation of 18 U.S.C. § 371.

**FORFEITURE**

1. The allegations contained in Count One are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Upon conviction of a conspiracy to violate 18 U.S.C. § 1343, in violation of 18 U.S.C. § 371, the defendant,

GREISYS CUELLAR-HERNANDEZ,  
shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations.

3. The property to be forfeited includes, but is not limited to, an order of forfeiture in the amount of at least \$52,128, representing the proceeds the defendant personally obtained from the offenses.

4. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

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By:



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Assistant United States Attorney

By:



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