

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
AT LOUISVILLE

FILED
JAMES J. VILT, JR. - CLERK
JUN 17 2026
U.S. DISTRICT COURT
WEST'N. DIST. KENTUCKY

UNITED STATES OF AMERICA

v.

EINAR SERRANO REYES

INDICTMENT

NO. 3:26-cr-74-DJH
18 U.S.C. § 2
18 U.S.C. § 981
18 U.S.C. § 982
18 U.S.C. § 1028(b)
18 U.S.C. § 1028A
18 U.S.C. § 1347
18 U.S.C. § 1349

The Grand Jury charges:

COUNT 1

(Conspiracy to Commit Health Care Fraud)

1. On or about and between August 29, 2025, and continuing through November 26, 2025, in the Western District of Kentucky, Jefferson County, Kentucky, and elsewhere, the defendant, **EINAR SERRANO REYES** did knowingly and willfully combine, conspire, and confederate and agree with others, known and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1347, that is, to knowingly and willfully execute, and attempt to execute, a scheme and artifice to defraud health care benefit programs, and to obtain, by means of false or fraudulent pretenses, representations, and promises, money and property owned by and under the custody and control of health care benefit programs, in connection with the delivery of, and payment for, health care benefits, items, and services.

Object of the Conspiracy and the Scheme to Defraud

2. It was the object of the conspiracy and scheme to obtain money from health care benefit programs by billing for services, which were never provided.

Manner and Means of the Conspiracy

3. It was part of the conspiracy that on August 29, 2025, **EINAR SERRANO REYES**, on behalf of JL Serenity Center LLC, entered into a lease agreement with Nigam Retail Complex, LLC to lease 3333 Bardstown Road, Unit E1C, Louisville, Kentucky, 40218. **EINAR SERRANO REYES** signed the lease agreement and emailed the lease agreement with a photocopy of his Florida driver's license to Nigam Retail Complex, LLC. On September 29, 2025, **EINAR SERRANO REYES** travelled to 3333 Bardstown Road, Louisville, Kentucky and entered into another written lease agreement with Nigam Retail Complex, LLC, for 3333 Bardstown Road, Unit 17, Louisville, Kentucky, 40218, on behalf of JL Serenity Center LLC. **EINAR SERRANO REYES** paid Nigam Retail Complex, LLC a total of \$7,000 in cash as a deposit for both units.

4. It was further part of the conspiracy that on September 5, 2025, J.F. incorporated JL Serenity Center LLC with the Kentucky Secretary of State listing the principal office address as 3333 Bardstown Road, Ste 1CE, Louisville, Kentucky 40218. On September 8, 2025, a Statement of Change of Registered Office was filed with the Kentucky Secretary of State, changing the registered agent from J.F. to **EINAR SERRANO REYES**.

5. It was further part of the conspiracy that on September 11, 2025, **EINAR SERRANO REYES** opened a JP Morgan Chase Bank account in Louisville, Kentucky in the name of JL Serenity Center LLC.

6. It was further part of the conspiracy that on or about September 16, 2025, **EINAR SERRANO REYES** contacted Dr. D.S. to be the medical director of JL Serenity Center LLC. Dr. D.S. provided **EINAR SERRANO REYES** with his National Provider Identifier (NPI) number to register JL Serenity Center LLC with the Center for Medicare and Medicaid Services (CMS).

7. It was further part of the conspiracy that on or about October 14, 2025, **EINAR SERRANO REYES** signed a CMS-460 form, Medicare Participating Physician or Supplier

Agreement, on behalf of JL Serenity Center LLC, and submitted the form to CMS. CMS-460 form is an official document used by healthcare providers to enroll as a participating provider in the Medicare Part B program. Additionally, on October 14, 2025, **EINAR SERRANO REYES** signed a CMS-855R form, Medicare Enrollment Application, on behalf of JL Serenity Center LLC, and submitted the form to CMS. The CMS-855R form allows an organization to submit claims and receive payments from Medicare Part B for services provided to patients.

8. It was further part of the conspiracy that on or about October 20, 2025, to on or about November 17, 2025, **EINAR SERRANO REYES**, through JL Serenity Center LLC, submitted \$315,050 in fraudulent claims to Medicare for services never provided.

9. It was further part of the conspiracy that the claims were required to contain the beneficiary's name and NPI of the doctor or clinic who allegedly ordered or performed the service; the item or service that was provided; the date of service; and the charge for the service. Dr. D.S.'s unique NPI number was used without Dr. D.S.'s knowledge in the false and fraudulent billings submitted for payment.

10. It was further part of the conspiracy that claims for payment for the fraudulent services were submitted to a health care benefit program using the patients' names, dates of birth, addresses, and patient IDs/Social Security Numbers, without the patients' knowledge.

In violation of Title 18, United States Code, Section 1349.

The Grand Jury further charges:

COUNTS 2-4
(*Health Care Fraud*)

On or about and between the dates listed below, in the Western District of Kentucky, Jefferson County, Kentucky, and elsewhere, the defendant, **EINAR SERRANO REYES**, aided and abetted by others, known and unknown to the Grand Jury, knowingly and willfully executed,

and attempted to execute, a scheme and artifice to defraud health care benefit programs, and to obtain, by means of false and fraudulent pretenses, representations, and promises money and property owned by, and under the custody and control of the health care benefit program, in connection with the delivery of, and payment for, health care benefits, items, and services.

In execution of the scheme to defraud, **EINAR SERRANO REYES** and others, caused to be submitted, or aided one another in causing the submission of, the following false and fraudulent health care claims to Medicare, which claims were false and fraudulent because the services were not provided.

COUNT	PATIENT	SERVICE DATE	BILLED DATE	BILLED AMOUNT
2	P.M.	October 24, 2025	November 18, 2025	\$75,850
3	M.A.	October 20, 2025	November 17, 2025	\$75,850
4	M.P.	October 21, 2025	November 17, 2025	\$1,250

In violation of Title 18, United States Code, Sections 1347 and 2.

The Grand Jury further charges:

COUNT 5
(*Aggravated Identity Theft*)

On or about November 17, 2025, in the Western District of Kentucky, Jefferson County, Kentucky, the defendant, **EINAR SERRANO REYES**, aided and abetted by others, known and unknown to the Grand Jury, did knowingly possess, transfer, and use the means of identification of another person, M.A., including MA.'s name and social security number, without lawful authority, during and in relation to the health care fraud offenses charged in Counts 1 and 3 of this Indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(5).

NOTICE OF FORFEITURE

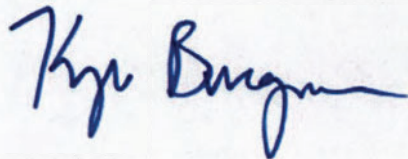
If convicted of any violation of Title 18, United States Code, Sections 1028A, 1347 and 1349, the defendant, **EINAR SERRANO REYES**, shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as the result of any such violation, and any property involved in, used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation.

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2)(B) and (7), and 1028(b), and Title 28, United States Code, Section 2461.

A TRUE BILL.

Redacted

FOREPERSON



KYLE G. BUMGARNER
UNITED STATES ATTORNEY

KGB:JRA/KMC-6-17-2026