UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA v. BALNI PIMENTEL LARA, aka J.F.S., Defendant.	Cr. No. 1:26CR00056-MRD-AEM In violation of: 42 U.S.C. § 408(a)(7)(B) 18 U.S.C. § 1028A 18 U.S.C. § 1347 18 U.S.C. § 1343

INDICTMENT

The Grand Jury charges that:

COUNT 1
42 U.S.C. § 408(a)(7)(B)
(False Representation of Social Security Number)

On or about January 5, 2022, in the District of Rhode Island, defendant BALNI PIMENTEL LARA, aka J.F.S., for the purpose of obtaining anything of value from any person, and for any other purpose, did, with intent to deceive, falsely represent a number to be the social security account number assigned by the Commissioner of Social Security to him on an application for benefits to the Rhode Department of Labor and Training under the Unemployment Insurance ("UI") Program, when in fact such number is not the social security account number assigned by the Commissioner of Social Security to him but rather the social security number of Victim A.

In violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT 2
18 U.S.C. § 1347
(Health Care Fraud)

From in or about March of 2014 to the present, in the District of Rhode Island and elsewhere, defendant BALNI PIMENTEL LARA, aka J.F.S., by applying for and obtaining Medicaid benefits using the identity of Victim A, knowingly executed and attempted to execute a scheme and artifice to defraud and to obtain money and property owned by, and under the custody and control of a health care benefit program, to wit Neighborhood Health Plan, in the total approximate amount of $24,018.86, in connection with the delivery of and payment for health care benefits, items and services.

In violation of Title 18, United States Code § 1347.

COUNT 3
18 U.S.C. § 1028A(a)(1)
(Aggravated Identity Theft)

On or about November 21, 2025, in the District of Rhode Island, defendant BALNI PIMENTEL LARA, aka J.F.S., did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, the name and social security number of Victim A, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c)(5), to wit, Health Care Fraud in violation of 18 U.S.C. § 1347, as charged in Count 2 of this Indictment,, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 4
18 U.S.C. § 1343
(Wire Fraud)

From in or about May of 2020 and continuing through on or about March of 2024, in the District of Rhode Island and elsewhere, defendant BALNI PIMENTEL LARA, aka J.F.S., by fraudulently applying, recertifying, and obtaining UI benefits from state UI agencies in the identity of Victim A, knowingly executed and attempted to execute a scheme and artifice to defraud and to obtain money, funds, assets, and other property, to wit UI Program benefits in the total approximate amount of $35,219, by transmitting and causing to be transmitted, by means of wire communications in interstate commerce of the UI applications and benefit payments, for the purpose of executing such scheme and artifice to defraud.

In violation of Title 18, United States Code § 1343.

A TRUE BILL:

[redacted]

Grand Jury Foreperson

John M. Moreira

JOHN M. MOREIRA
Special Assistant U.S. Attorney

Stacey A. Erickson

STACEY A. ERICKSON
Assistant U.S. Attorney
Criminal Division Chief

Date: 6/17/2026

ATTACHMENT TO DEFENDANT INDICTMENT RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

DEFENDANT: Balni Pimentel Lara, aka Jose Feliciano Santiago

COUNT I: 42 U.S.C. § 408(a)(7)(B) - False Representation of Social Security – Felony.

MAXIMUM PENALTIES: Imprisonment: 5 years; Supervised release: 3 years; Fine: $250,000; and Special assessment: $100.

COUNT II: 18 U.S.C. § 1347- Health Care Fraud – Felony

MAXIMUM PENALTIES: Imprisonment:10 years; Supervised release: 3 years; Fine: $250,000; and Special assessment: $100.

COUNT III: 18 U.S.C. § 1028A(a)(1) - Aggravated Identity Theft - Felony

MAXIMUM PENALTIES: Imprisonment: mandatory 2 years; Supervised release: 3 years; Fine: $250,000; and Special assessment: $100.

COUNT IV: 18 U.S.C. § 1343 - Wire Fraud -Felony

MAXIMUM PENALTIES: Imprisonment: 20 years; Supervised release: 3 years; Fine: $250,000; and Special assessment: $100.