UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 26-CR-20244-ALTONAGA/REID

18 U.S.C. § 1349
18 U.S.C. § 982(a)(7)

UNITED STATES OF AMERICA

vs.

YILIAN CRUZ and
INTI CRUZ,

Defendants.
_______________________________/

FILED BY BM D.C.
Jun 18, 2026
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

INFORMATION

The United States Attorney charges that:

GENERAL ALLEGATIONS

At all times relevant to this Information:

The Florida Medicaid Program

1. The Florida Medicaid Program ("Medicaid") was a partnership between the state of Florida and the federal government that provided health care benefits to certain low-income individuals in Florida. The benefits available under Medicaid were governed by federal and state statutes and regulations. Medicaid was administered by the Centers for Medicare and Medicaid Services ("CMS") and the Agency for Health Care Administration ("AHCA"). Individuals who received benefits under Medicaid were commonly referred to as Medicaid "recipients."

2. Medicaid was financed with both federal and state funds and was a "health care benefit program," as defined by Title 18, United States Code, Section 24(b).

3. Health care providers seeking to bill Medicaid for the cost of related benefits, items, and services were required to apply for and receive a "provider number." The provider

number allowed a health care provider to submit bills, known as "claims," to Medicaid, in order to obtain reimbursements for the cost of health care benefits, items, and services provided to Medicaid recipients.

4. Medicaid permitted these providers to submit claim forms electronically. The health insurance claim forms required the provider to provide certain important information, including: (a) the Medicaid recipient's name and identification number; (b) the identification number of the doctor or other qualified health care provider who ordered or provided the health care benefit, item, or services that was the subject of the claim; (c) the health care benefit, item, or service that was provided or supplied to the beneficiary; (d) the billing codes for the benefit, item, or service; and (e) the date upon which the benefit, item, or service was provided or supplied to the recipient.

5. When a claim was submitted to Medicaid, the provider certified that the contents of the form were true, correct, and complete, and that the form was prepared in compliance with the laws and regulations governing the Medicaid program. The provider further certified that the services and health care items being billed were medically necessary and were in fact provided as billed.

6. Medicaid generally paid a substantial portion of the costs of the health care benefits, items, and services that were medically necessary and ordered by licensed doctors or other licensed and qualified health care providers. Payments were typically made directly to the health care provider rather than to the Medicaid recipient.

7. Medicaid reimbursed providers for a type of mental health services called "psychosocial rehabilitation services." Psychosocial rehabilitation ("PSR") services consisted of mental health counseling to improve a recipient's ability to perform the activities of daily living

or to improve their ability to perform a job while coping with their mental disorder. The mental disorders treated in this manner included, among other things, depression and anxiety.

8. Medicaid would reimburse the providers of PSR services, called "community behavioral health services providers," for performing an initial mental health evaluation, developing a treatment plan, and providing up to a maximum of 480 hours of medically necessary PSR services to a Medicaid recipient per year.

The Defendants, Relevant Individuals, and Entities

9. De La Cruz Mental Health LLC ("DE LA CRUZ") was a Florida corporation located at 4634 NW 27th Avenue, Miami, Florida, purporting to provide PSR services.

10. Defendant **YILIAN CRUZ** was a resident of Miami-Dade County, and an officer and the sole registered agent of DE LA CRUZ.

11. Defendant **INTI CRUZ**, husband of **YILIAN CRUZ**, was a resident of Miami-Dade County, and an officer of DE LA CRUZ.

12. CO-CONSPIRATOR-1 was a resident of Miami-Dade County, and a silent partner and beneficial co-owner of DE LA CRUZ.

13. CO-CONSPIRATOR-2 was a resident of Miami-Dade County, an agent of CO-CONSPIRATOR-1, and a DE LA CRUZ employee.

14. Therapist-1 was a resident of Miami-Dade County and a DE LA CRUZ employee.

15. Recruiter-1 was a resident of Miami-Dade County.

Conspiracy to Commit Health Care Fraud
(18 U.S.C. § 1349)

16. From in or around September 2024, and continuing through in or around October 2025, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

YILIAN CRUZ and
INTI CRUZ,

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other, CO-CONSPIRATOR-1, CO-CONSPIRATOR-2, and others known and unknown to the United States Attorney, to commit an offense against the United States, that is, to knowingly and willfully execute a scheme and artifice to defraud a health care benefit program affecting commerce, as defined in Title 18, United States Code, Section 24(b), that is Medicaid, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, said health care benefit program, in connection with the delivery of and payment for health care benefits, items, and services, in violation of Title 18, United States Code, Section 1347.

PURPOSE OF THE CONSPIRACY

17. It was the purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by, among other things: (a) offering and paying kickbacks and bribes for the referral of Medicaid recipients to serve as patients at DE LA CRUZ; (b) offering and paying kickbacks and bribes to Medicaid recipients to induce them to accept PSR services from DE LA CRUZ that were not provided as represented; (c) submitting and causing the submission of false and fraudulent claims to Medicaid for PSR and related services that were not provided as represented; (d) concealing the submission of false and fraudulent claims to Medicaid and the receipt of the fraud proceeds; and (e) diverting fraud proceeds for their personal use and benefit, the benefit of others, and to further the fraud conspiracy.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and their co-conspirators sought to accomplish the object and purpose of the conspiracy included, among other things, the following:

18. CO-CONSPIRATOR-1 and CO-CONSPIRATOR-2 recruited and referred Medicaid recipients to **YILIAN CRUZ** and **INTI CRUZ**, by offering and paying kickbacks to the Medicaid recipients to receive PSR and related services from DE LA CRUZ that were not all provided as represented.

19. **YILIAN CRUZ** and **INTI CRUZ** offered and paid kickbacks to Recruiter-1 to recruit and refer Medicaid recipients to receive PSR and related services from DE LA CRUZ that were not all provided as represented.

20. CO-CONSPIRATOR-1, CO-CONSPIRATOR-2, **YILIAN CRUZ**, and **INTI CRUZ** offered and paid kickbacks to Medicaid recipients for agreeing to accept PSR and related services from DE LA CRUZ that were not all provided as represented.

21. **YILIAN CRUZ**, **INTI CRUZ**, CO-CONSPIRATOR-2, Therapist-1, and others implemented and oversaw an informal policy at DE LA CRUZ preparing therapy records (including attendance sheets) to bill PSR therapy sessions on behalf of Medicaid recipients four (4) days per week, despite only instructing and expecting the Medicaid recipients to attend PSR therapy sessions two (2) days per week.

22. **YILIAN CRUZ**, CO-CONSPIRATOR-2, and others submitted and caused DE LA CRUZ to submit false and fraudulent claims to Medicaid, via interstate wire communications, for PSR and related services that were not provided as represented.

23. As a result, DE LA CRUZ submitted approximately $1,311,459 in false and fraudulent claims to Medicaid for PSR and related services that were not provided, and Medicaid reimbursed approximately $1,170,898 in payments to DE LA CRUZ based on those claims.

24. **YILIAN CRUZ, INTI CRUZ**, CO-CONSPIRATOR-1, CO-CONSPIRATOR-2, and their co-conspirators used the proceeds of the health care fraud for their personal use and benefit, the use and benefit of others, and to further the fraud.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATIONS

1. The allegations of this Information are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants, **YILIAN CRUZ** and **INTI CRUZ**, have an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1349, as alleged in this Information, each defendant shall forfeit to the United States any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense, pursuant to Title 18, United States Code, Section 982(a)(7).

3. All pursuant to Title 18, United States Code, Section 982(a)(7), and the procedures set forth at Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Sections 982(b)(1).

Yisel Valdes FOR

JASON A. REDING QUIÑONES
UNITED STATES ATTORNEY

for

EDUARDO GARDEA, JR.
ASSISTANT UNITED STATES ATTORNEY

NOAH P. DORMAN
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA | **CASE NO.** ______________________

v.

YILIAN CRUZ and INTI CRUZ,

______________________________/
Defendants.

Court Division (select one)
☒ Miami ☐ Key West ☐ FTP
☐ FTL ☐ WPB

CERTIFICATE OF TRIAL ATTORNEY

Superseding Case Information:
New Defendant(s) (Yes or No) ______
Number of New Defendants ______
Total Number of New Counts ______

I do hereby certify that:

1. I have carefully considered the allegations of the Indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, 28 U.S.C. §3161.
3. Interpreter: (Yes or No) Yes
   List language and/or dialect: Spanish
4. This case will take 0 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)		(Check only one)
I	☒ 0 to 5 days	☐ Petty
II	☐ 6 to 10 days	☐ Minor
III	☐ 11 to 20 days	☐ Misdemeanor
IV	☐ 21 to 60 days	☒ Felony
V	☐ 61 days and over	

6. Has this case been previously filed in this District Court? (Yes or No) No
   If yes, Judge ______________ Case No. ______________
7. Has a complaint been filed in this matter? (Yes or No) No
   If yes, Judge ______________ Magistrate Case No. ______________
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
   If yes, Judge ______________ Case No. ______________
9. Defendant(s) in federal custody as of ______________
10. Defendant(s) in state custody as of ______________
11. Rule 20 from the ________ District of ______________
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? (Yes or No) No
14. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
15. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
16. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No
17. Did this matter involve the participation of or consultation with Magistrate Judge Yeney Hernandez during her tenure at the U.S. Attorney's Office, which concluded on April 2, 2026? No

By: ______________________
Eduardo Gardea, Jr.
Assistant United States Attorney
SDFL Court ID No. A5502663

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: YILIAN CRUZ

Case No: ____________________

Count # 1:

Conspiracy to Commit Health Care Fraud

Title 18, United States Code, Section 1349

* **Max. Term of Imprisonment:** Ten (10) Years
* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
* **Max. Supervised Release:** Three (3) Years
* **Max. Fine:** $250,000 or Twice the Gross Gain or Gross Loss Resulting from the Offense

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: INTI CRUZ

Case No: ______________________

Count # 1:

Conspiracy to Commit Health Care Fraud

Title 18, United States Code, Section 1349
* **Max. Term of Imprisonment:** Ten (10) Years
* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
* **Max. Supervised Release:** Three (3) Years
* **Max. Fine:** $250,000 or Twice the Gross Gain or Gross Loss Resulting from the Offense

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 26-CR-20244-ALTONAGA/REID

BOND RECOMMENDATION

DEFENDANT: YILIAN CRUZ

$100,000 Personal Surety Bond
(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: ______________________
AUSA: Eduardo Gardea, Jr.

Last Known Address: 8254 NW 165th Street
Miami Lakes, Florida 33016

What Facility: ______________________

Agent(s): Carlos A. Baixauli Jr.
(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)
U.S. Dept. of Health & Human Services - Off. Insp. Gen. (HHS-OIG)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 26-CR-20244-ALTONAGA/REID

BOND RECOMMENDATION

DEFENDANT: INTI CRUZ

$100,000 Personal Surety Bond
(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: [signature]
AUSA: Eduardo Gardea, Jr.

Last Known Address: 8254 NW 165th Street

Miami Lakes, Florida 33016

What Facility:

Agent(s): Carlos A. Baixauli Jr.
(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)
U.S. Dept. of Health & Human Services - Off. Insp. Gen. (HHS-OIG)

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America v. INTI CRUZ, _________________________ *Defendant*	)))))	Case No. 26-CR-20244-ALTONAGA/REID

WAIVER OF AN INDICTMENT

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: ________________

____
Defendant's signature

____
Signature of defendant's attorney

Peter Suarez, Esq.
Printed name of defendant's attorney

____
Judge's signature

____
Judge's printed name and title

UNITED STATES DISTRICT COURT
for the
Southern District of Florida

United States of America
v.
YILIAN CRUZ,
Defendant

Case No. 26-CR-20244-ALTONAGA/REID

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Date: ________________

Defendant's signature

Signature of defendant's attorney

Louis V. Martinez, Esq.
Printed name of defendant's attorney

Judge's signature

Judge's printed name and title