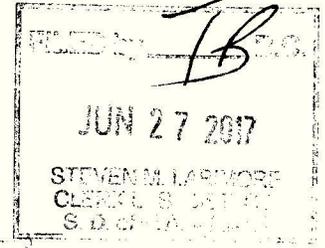


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA



Case No. **17-20440**
18 U.S.C. § 1347
18 U.S.C. § 872(a)(7)

**MAGISTRATE JUDGE
OTAZO REYES**

UNITED STATES OF AMERICA

vs.

**JORGE A. GONZALEZ and
LAZARO LA PAZ PAZ,**

Defendants.

_____ /

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

Commercial Insurance

1. Blue Cross Blue Shield of Florida was a (BCBS-FL) "health care benefit program," as defined by Title 18, United States Code, Section 24(b).

2. BCBS-FL made payments directly to physicians, medical clinics, or other health care providers, rather than to the beneficiary who received the health care benefits, items, and services. This occurred when the provider accepted assignment of the right to payment from the beneficiary.

3. To obtain payment for treatment or services provided to a beneficiary, physicians, medical clinics, and other health care providers had to submit itemized claim forms to the beneficiary's commercial insurance plan. The claim forms were typically submitted electronically via the internet. The claim form required certain important information, including:

(a) the beneficiary's name and health insurance company identification number; (b) a description of the health care benefit, item, or service that was provided or supplied to the beneficiary; (c) the billing codes for the benefit, item, or service; (d) the date upon which the benefit, item, or service was provided or supplied to the beneficiary; and (e) the name of the referring physician or other health care provider, as well as a unique identifying number, known either as the Unique Physician Identification Number ("UPIN") or National Provider Identifier ("NPI").

4. When a provider submitted a claim form to a commercial insurance plan, the provider certified that the contents of the form were true, correct, complete, and that the form was prepared in compliance with the laws and regulations. The submitting party also certified that the services being billed were medically necessary and were, in fact, provided as billed.

The Defendants and a Related Entities

5. Gold Medical Center, Inc. ("Gold Medical") was a Florida corporation, located at 949 SW 122nd Ave, Miami, Florida. Gold Medical was a medical clinic that purportedly provided private insurance beneficiaries with various medical treatments and services.

6. Xtra Health Center, Inc. ("Xtra") was a Florida corporation, located at 951 SW 122nd Ave, Miami, Florida. Xtra was a medical clinic that purportedly provided private insurance beneficiaries with various medical treatments and services.

7. Defendant **JORGE A. GONZALEZ** was a resident of Miami-Dade County.

8. Defendant **LAZARO LA PAZ PAZ** was a resident of Miami-Dade County.

CONSPIRACY TO COMMIT HEALTH CARE FRAUD AND WIRE FRAUD
(18 U.S.C. § 1349)

From in or around April of 2014, through in or around February of 2015, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JORGE A. GONZALEZ and
LAZARO LA PAZ PAZ,**

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to commit offenses against the United States of America, that is:

a. to 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, BCBS-FL, 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 violation of Title 18, United States Code, Section 1347; and

b. to knowingly and with intent to defraud, devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing the scheme and artifice, did knowingly transmit and cause to be transmitted by means of wire communication in interstate commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

Purpose of the Conspiracy

It was a purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by, among other things: (a) submitting and causing the submission of false and fraudulent claims to a health care benefit program; (b) concealing the submission of false and fraudulent claims to a health care benefit program; (c) concealing the receipt of the fraud proceeds; and (d) diverting the fraud proceeds for their personal use and benefit, and to further the fraud.

Manner and Means of the Conspiracy

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

9. Defendants **JORGE A. GONZALEZ** and **LAZARO LA PAZ PAZ** submitted and caused the submission of approximately \$3,066,540 in claims, via interstate wires, for reimbursement to BCBS-FL, such claims falsely and fraudulently representing that medical services were prescribed by doctors and provided to private insurance beneficiaries by Gold Medical and Xtra.

10. As a result of such false and fraudulent claims, **JORGE A. GONZALEZ** and **LAZARO LA PAZ PAZ** caused BCBS-FL to make payments to Gold Medical and Xtra in the approximate amount of \$528,226.63.

11. **JORGE A. GONZALEZ** and **LAZARO LA PAZ PAZ** used the proceeds of the health care fraud for their personal use and benefit and to further the fraud scheme.

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

FORFEITURE
(18 U.S.C. § 982(a)(7))

1. The allegations contained in this Indictment are realleged and incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture to the United States of certain property in which the defendants, **JORGE A. GONZALEZ** and **LAZARO LA PAZ PAZ**, have an interest.

2. Upon conviction of any violation of Title 18, United States Code, Section 1349, as alleged in this Indictment, the defendants shall forfeit to the United States all of their respective right, title, and interest in any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of such violation, pursuant to Title 18, United States Code, Section 982(a)(7).

3. The property subject to forfeiture includes, but is not limited to, the following: (a) the sum of \$ 528,226.63 in United States currency, which amount is equal to the gross proceeds traceable to the commission of the violations alleged in this Indictment, which the United States will seek as a forfeiture money judgment as part of the defendants' sentence.

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

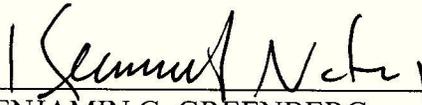
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot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

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property and, in addition, to seek a court order requiring the defendants to return any such property to the jurisdiction of the court for seizure and forfeiture.

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 made applicable by Title 18, United States Code, Section 982(b)(1).

A TRUE BILL

FC



BENJAMIN G. GREENBERG
ACTING UNITED STATES ATTORNEY



MICHAEL B. NADLER
ASSISTANT UNITED STATES ATTORNEY

**+UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: JORGE A. GONZALEZ

Case No: _____

Count #1:

Conspiracy to Commit Health Care Fraud and Wire Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Twenty (20) years' imprisonment

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

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: LAZARO LA PAZ PAZ

Case No: _____

Count #1:

Conspiracy to Commit Health Care Fraud and Wire Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Twenty (20) years' imprisonment

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