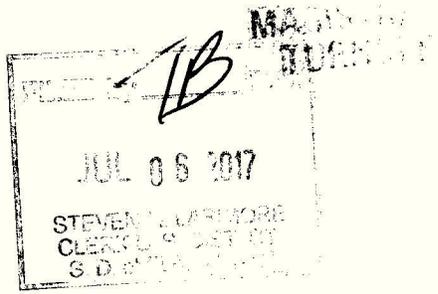


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 17-20470 CR-MORENO

18 U.S.C. § 1347
18 U.S.C. § 2
18 U.S.C. § 982(a)(7)



UNITED STATES OF AMERICA

vs.

LEOPOLDO BECERRA,

Defendant.

_____ /

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

Commercial Insurance

1. Blue Cross Blue Shield of Florida (BCBS-FL) was a "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 Defendant and a Related Entity

5. Doctor Jalal Taslimi Medical Center, Inc. ("Taslimi Medical") was a Florida corporation, located at 325 S Biscayne Blvd., Miami, Florida. Taslimi was a medical clinic that purportedly only conducted private medical research.

6. Defendant **LEOPOLDO BECERRA** was a resident of Miami-Dade County.

COUNTS 1-10
HEALTH CARE FRAUD
(18 U.S.C. § 1347)

1. The General Allegations section of this Indictment is realleged and incorporated by reference as if fully set forth herein.

2. From on or about November 25, 2014, through on or about May 25, 2015, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

LEOPOLDO BECERRA,

in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully execute, and attempt 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.

Purpose of the Scheme and Artifice

3. It was a purpose of the scheme and artifice for the defendant to unlawfully enrich himself 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 his personal use and benefit, and to further the fraud.

The Scheme and Artifice

4. Defendant **LEOPOLDO BECERRA** submitted and caused the submission of approximately \$1,036,682 in false and fraud fraudulent claims for reimbursement to BCBS-FL,

such claims falsely and fraudulently representing that medical services were prescribed by a doctor and provided to beneficiaries by Taslimi Medical.

5. As a result of such false and fraudulent claims, **LEOPOLDO BECERRA** caused BCBS-FL to make payments to Taslimi Medical in the approximate amount of \$236,984.

6. **LEOPOLDO BECERRA** used the proceeds of the health care fraud for his personal use and benefit and to further the fraud scheme.

Acts in Execution or Attempted Execution of the Scheme and Artifice

7. On or about the dates specified below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant, in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully execute, and attempt to execute, the above-described scheme and artifice to defraud a health care benefit program affecting commerce, 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 that the defendant submitted and caused the submission of false and fraudulent claims to BCBS-FL seeking the identified dollar amounts, and representing that Taslimi Medical provided medical treatment and services to commercial beneficiaries pursuant to physicians' orders and prescriptions:

Count	Beneficiary	Approx. Date Claim Received	Item Claimed; Approx. Amount Claimed
1	O.N.	12/18/2014	Injection, Dexamethasone Sodium Phosphate, up to 15MG; \$1,850
2	G.M.	2/11/15	Injection, Orphenadrine Citrate, up to 60MG; \$1,800
3	G.M.	02/23/15	Injection, Orphenadrine Citrate, up to 60MG; \$1,800
4	K.L.	03/04/2015	Injection, Orphenadrine Citrate, up to 60MG; \$2,000
5	C.G.M.	03/04/2015	Injection, Orphenadrine Citrate, up to 60MG; \$1,800
6	K.L.	03/16/2015	Injection, Orphenadrine Citrate, up to 60MG; \$2,500
7	C.G.M.	03/27/2015	Injection, Orphenadrine Citrate, up to 60MG; \$1,800
8	F.L.G.	04/07/2015	Injection, Orphenadrine Citrate, up to 60MG; \$2,500
9	F.L.G.	04/15/2015	Injection, Orphenadrine Citrate, up to 60MG; \$2,500
10	C.G.M.	04/21/2015	Injection, Orphenadrine Citrate, up to 60MG; \$2,500

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

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 defendant, **LEOPOLDO BECERRA**, has an interest.

2. Upon conviction of any violation of Title 18, United States Code, Section 1347, as alleged in Counts 1 through 10 of this Indictment, the defendant shall forfeit to the United States all of his 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 sum of \$236,984.47 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 defendant's sentence.

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

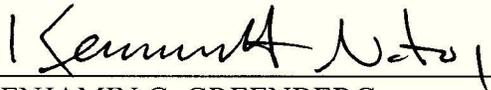
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

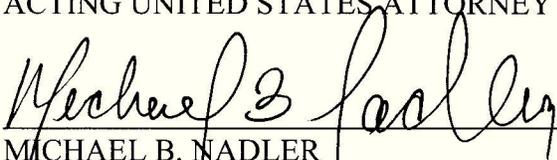
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property and, in addition, to seek a court order requiring the defendant to return any such property to the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



BENJAMIN G. GREENBERG
ACTING UNITED STATES ATTORNEY



MICHAEL B. NADLER
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO. _____

vs.

CERTIFICATE OF TRIAL ATTORNEY*

LEOPOLDO BECERRA

Defendant.

_____ /

Superseding Case Information:

Court Division: (Select One)

X Miami _____ Key West
 _____ FTL _____ WPB _____ FTP

New Defendant(s) Yes _____ No _____
 Number of New Defendants _____
 Total number of 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, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) NO
 List language and/or dialect _____

4. This case will take 7 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	<u> X </u>	Minor
II	11 to 20 days	_____	Misdem.
IV	21 to 60 days	_____	Felony
V:	61 days and over	_____	<u> X </u>

6. Has this case been previously filed in this District Court? (Yes or No) NO

If yes: Judge: _____ Case No. _____

(Attach copy of dispositive order)
 Has a complaint been filed in this matter? (Yes or No) NO

If yes: Magistrate Case No. _____

Related Miscellaneous numbers: _____

Defendant(s) in federal custody as of _____

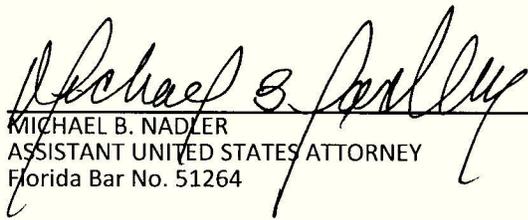
Defendant(s) in state custody as of _____

Rule 20 from the _____ District of _____

Is this a potential death penalty case? (Yes or No) NO

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? _____ Yes X No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? _____ Yes X No


 MICHAEL B. NADLER
 ASSISTANT UNITED STATES ATTORNEY
 Florida Bar No. 51264

*Penalty Sheet(s) attached

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

PENALTY SHEET

Defendant's Name: LEOPOLDO BECERRA

Case No: _____

Counts #1-10:

Health Care Fraud

Title 18, United States Code, Section 1347

***Max. Penalty:** Ten (10) 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.**