

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. _____

17-20470

CR-MORENO

18 U.S.C. § 1347

18 U.S.C. § 2

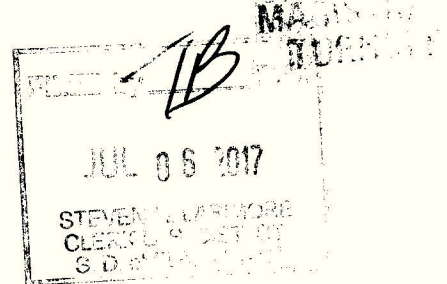
18 U.S.C. § 982(a)(7)

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;

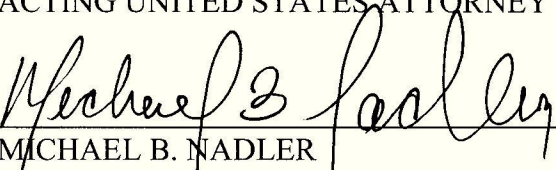
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property and, in addition, to seek a court order requiring the defendant to return any such property to the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

17


BENJAMIN G. GREENBERG
ACTING UNITED STATES ATTORNEY


MICHAEL B. NADLER
ASSISTANT UNITED STATES ATTORNEY

CASE NO.

CERTIFICATE OF TRIAL ATTORNEY*

Defendant.

Superseding Case Information:

Yes _____ No _____

Total number of counts

(Check only one)

REV 4/8/08

**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.**