

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

12-60090

CR-WILLIAMS

Case No.

18 U.S.C. § 1956(h)
18 U.S.C. § 1956(a)(1)(B)(i)
18 U.S.C. § 1957
18 U.S.C. § 2
18 U.S.C. § 982

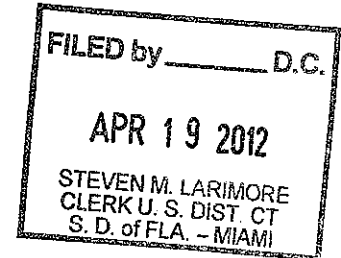
MAGISTRATE JUDGE
BRUCE SNOW

UNITED STATES OF AMERICA

vs.

ORLANDO PIEDRA,

Defendant.



INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

Medi Health Consultants, Inc. ("Medi Health") was a Florida company, incorporated on or about May 12, 2006, with its principal place of business in Broward County, in the Southern District of Florida. Defendant **ORLANDO PIEDRA** was the president of Medi Health. **PIEDRA** controlled Ocean Bank Account No. xxxxxxxx8905 and AmTrust Bank Account No. xxxxxxxx0294 opened on behalf of Medi Health.

COUNT 1

**Conspiracy to Commit Money Laundering
(18 U.S.C. § 1956(h))**

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 June 12, 2007, and continuing through on or about September 14, 2009, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

ORLANDO PIEDRA,

did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to commit the following violations:

(a) to knowingly conduct a financial transaction affecting interstate commerce, which transaction involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing that such transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

(b) to knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, by, through, and to, a financial institution, involving criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

3. It is further alleged that the specified unlawful activity is health care fraud, in violation of Title 18, United States Code, Section 1347.

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS 2-12
Money Laundering
(18 U.S.C. § 1956(a)(1)(B)(i))

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

2. On or about the dates specified as to each count below, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

ORLANDO PIEDRA,

did knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, which transaction involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, as set forth below:

| Count | Approximate Date of Transaction | Description of Financial Transaction |
|--------------|--|---|
| 2 | 06/13/2007 | The deposit of approximately \$5,500 into Ocean Bank Account xxxxxxxx8905 via Check No. 1765, drawn on the account of Font & Bou Rehab Associates, Inc. and made payable to Medi Health Consultants. |
| 3 | 10/17/2007 | The deposit of approximately \$6,500 into Ocean Bank Account xxxxxxxx8905 via Check No. 2174, drawn on the account of Bou Inc. and made payable to Medi Health. |
| 4 | 11/14/2007 | The deposit of approximately \$3,500 into Ocean Bank Account xxxxxxxx8905 via Check No. 2246, drawn on the account of Bou Inc. and made payable to Medi Health. |
| 5 | 11/15/2007 | The deposit of approximately \$2,000 into Ocean Bank Account xxxxxxxx8905 via Check No. 2247, drawn on the account of Bou Inc. and made payable to Medi Health. |
| 6 | 12/10/2008 | The deposit of approximately \$4,600 into Ocean Bank Account xxxxxxxx8905 via Check No. 2783, drawn on the account of Font & Bou Rehab Associates, Inc. and made payable to Medi Health Consultants. |

| Count | Approximate Date of Transaction | Description of Financial Transaction |
|-------|---------------------------------|--|
| 7 | 12/15/2008 | The deposit of approximately \$7,800 into Ocean Bank Account xxxxxxxx8905 via Check No. 2798, drawn on the account of Font & Bou Rehab Associates, Inc. and made payable to Medi Health . |
| 8 | 12/16/2008 | The deposit of approximately \$3,820 into Ocean Bank Account xxxxxxxx8905 via Check No. 2794, drawn on the account of Font & Bou Rehab Associates, Inc. and made payable to Medi Health . |
| 9 | 01/16/09 | The deposit of approximately \$4,500 into Ocean Bank Account xxxxxxxx8905 via Check No. 3164, drawn on the account of Bou Inc. and made payable to Medi Health . |
| 10 | 01/23/2009 | The deposit of approximately \$5,500 into Ocean Bank Account xxxxxxxx8905 via Check No. 3186, drawn on the account of Bou Inc. and made payable to Medi Health Consultants . |
| 11 | 07/31/2009 | The deposit of approximately \$5,500 into AmTrust Bank Account xxxxxxxx0294 via Check No. 3520, drawn on the account of Font & Bou Rehab Associates, Inc. and made payable to Medi Health . |
| 12 | 09/14/2009 | The deposit of approximately \$5,100 into AmTrust Bank Account xxxxxxxx0294 via Check No. 3633, drawn on the account of Font & Bou Rehab Associates, Inc. and made payable to Medi Health . |

3. It is further alleged that the specified unlawful activity is health care fraud, in violation of Title 18, United States Code, Section 1347.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS 13-16
Money Laundering
(18 U.S.C. § 1957)

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

2. On or about the dates specified as to each count below, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

ORLANDO PIEDRA,

did knowingly engage and attempt to engage in a monetary transaction affecting interstate commerce, by, through, and to, a financial institution, involving criminally derived property of a value greater than \$10,000, and such property having been derived from specified unlawful activity, as set forth below:

| Count | Approximate Date of Transaction | Description of Monetary Transaction |
|-------|---------------------------------|--|
| 13 | 07/23/2007 | The deposit of approximately \$15,000 into Ocean Bank Account xxxxxxxx8905 via Check No. 1268, drawn on the account of American Wellness Center, Inc. and made payable to Medi Health . |
| 14 | 07/27/2007 | The deposit of approximately \$11,700 into Ocean Bank Account xxxxxxxx8905 via Check No. 1827, drawn on the account of Hallandale Rehabilitation, Inc. and made payable to Medi Health Consultants . |
| 15 | 08/15/2007 | The deposit of approximately \$12,323 into Ocean Bank Account xxxxxxxx8905 via Check No. 1299, drawn on the account of American Wellness Center, Inc. and made payable to Medi Health Consultants . |
| 16 | 08/20/2008 | The deposit of approximately \$15,000 into Ocean Bank Account xxxxxxxx8905 via Bank of America Cashier's Check No. 6358883 in the name of Tropical Physical Therapy Corporation and made payable to Medi Health Consultants . |

3. It is further alleged that the specified unlawful activity is health care fraud, in violation of Title 18, United States Code, Section 1347.

In violation of Title 18, United States Code, Sections 1957 and 2.

FORFEITURE
(18 U.S.C. § 982)

1. The allegations contained in Counts 1 through 16 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **ORLANDO PIEDRA**, has an interest.

2. Upon conviction of a violation of, or a conspiracy to violate, Title 18, United States Code, Section 1956 or 1957, as alleged in this Indictment, the defendant shall forfeit to the United States all of his right, title and interest in any property, real or personal, involved in such violation, or in any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

3. The United States will seek a forfeiture money judgment against the defendant as part of his sentence upon conviction in the following amount: \$549,695 in United States currency, which is a sum of money equal in value to the property, real or personal, involved in the violations alleged in this Indictment, and the property traceable to such property.

All pursuant to Title 18, United States Code, Section 982(a)(1) 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
FOREPERSON

F. Ferrer, Chief, Criminal Div
WIFREDO A. FERRER
UNITED STATES ATTORNEY

Jon M. Juenger
JON M. JUENGER
ASSISTANT UNITED STATES ATTORNEY