

**INTAKE****FILED**

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Stephen Chahn Lee (312) 353-4127

**JUN 26 2018**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**JUN 26 2018**Magistrate Judge Sidney I. Schenkier  
United States District Court

UNITED STATES OF AMERICA

v.

FAIZAN MIR,  
also known as "Zeshawn Ali"

CASE NUMBER:

UNDER SEAL

**18CR 397****MAGISTRATE JUDGE SCHENKIER****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Beginning no later than 2013 and continuing until the present, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 1347	knowingly and willfully participated in a scheme to defraud health care benefit programs, including Illinois Medicaid, and to obtain, by means of false and fraudulent representations, money under the control of those programs in connection with the delivery of or payment for health care services, and, in execution of the scheme, on or about August 6, 2015, did knowingly cause to be submitted a false claim, specifically, a claim that Dentist MW performed a filling on August 6, 2015 for Patient BE, when defendant knew that no such service was actually provided

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

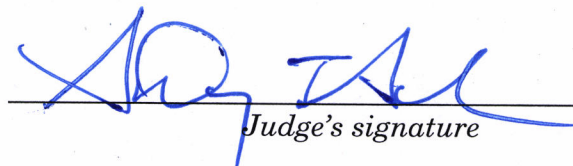


SUZANNE BECKERMAN

Special Agent, Federal Bureau of Investigation  
(FBI)

Sworn to before me and signed in my presence.

Date: June 26, 2018



Judge's signature

City and state: Chicago, Illinois

SIDNEY I. SCHENKIER, U.S. Magistrate Judge

Printed name and Title

UNITED STATES DISTRICT COURT                     )  
                                                                  )       ss  
NORTHERN DISTRICT OF ILLINOIS                 )

AFFIDAVIT

I, Suzanne Beckerman, being duly sworn, state as follows:

**I.     BACKGROUND OF AFFIANT**

1.     I am a Special Agent with the Federal Bureau of Investigation. I have been so employed for approximately 15 years and am currently assigned to a health care squad.

2.     As part of my duties as a Special Agent, I investigate criminal violations relating to white collar crime, including health care fraud. Through my training and experience, I have become familiar with the methods by which individuals and entities conduct health care fraud and the tools used in the investigation of such violations, including consensual monitoring, surveillance, data analysis, and conducting interviews of witnesses, informants, and others who have knowledge of fraud perpetrated against Medicare. I have participated in the execution of multiple federal search warrants. Along with other federal agents, I am responsible for the investigation of FAIZAN MIR regarding billing of false claims for dental services.

**II.   BASIS AND PURPOSE OF AFFIDAVIT**

3.     This affidavit is submitted in part for the limited purpose of establishing probable cause to support a criminal complaint charging that beginning no later than 2013 and continuing until the present, FAIZAN MIR knowingly and willfully participated in a scheme to defraud health care benefit programs, including Illinois Medicaid, and to obtain, by means of false and fraudulent representations, money under the control of those programs in connection with the delivery of or payment for health care services, and, in execution of the scheme, on or about August 6, 2015, did knowingly cause to be submitted a false claim, specifically, a claim that Dentist MW performed a

filling on August 6, 2015 for Patient BE, when defendant knew that no such service was actually provided, in violation of Title 18, United States Code, Section 1347.

4. The statements in this affidavit are based on my personal knowledge, and on information that I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purposes set forth above, I have not included each and every fact known to me concerning this investigation.

### **III. BACKGROUND INFORMATION**

5. According to discussions with DentaQuest representatives, DentaQuest is a dental benefits administrator that works with private insurers and Medicaid programs to process various matters regarding dental insurance, including making payments to providers for covered services. DentaQuest's corporate headquarters is in Boston, Massachusetts and has locations in Florida, South Carolina, Wisconsin, Tennessee, and Texas.

6. According to a DentaQuest representative, a dental practice can submit claims to DentaQuest for services to programs such as Illinois Medicaid and managed care organizations that are run by private companies, funded by Medicaid, and administered by DentaQuest. According to a DentaQuest representative, a dental practice must submit a credentialing application prior to submitting claims for certain programs.

7. According to the representative, a dental practice bills DentaQuest by providing information about the services that the practice seeks payment for, including information about the patient, the service allegedly performed, and the date of service. According to the representative, DentaQuest does not request records for routine procedures, but does set a limit on the number of times that certain procedures can be done in a specified period of time. According to the



representative, DentaQuest assumes the truth of the claims submitted—particularly that the purported services identified in the claims were actually performed—and typically pays claims for routine services without verifying the accuracy of the claims submitted.

#### **IV. FACTS SUPPORTING PROBABLE CAUSE**

##### **A. Overview**

8. As described in more detail below, the investigation has determined that companies run by or connected to FAIZAN MIR have submitted claims in the names of multiple dentists who have said that they did not work for those companies at the relevant times and in the names of multiple patients who said that they did not receive dental services as billed. The table below summarizes the four companies connected to MIR that have submitted claims in the names of dentists who have denied working for the respective companies at the time of the submitted claims. As summarized below, according to DentaQuest data, health programs have paid more than \$1 million to these four companies on claims submitted in the name of such dentists.

Company	Address	MIR role, according to Secretary of State database	Providers who allegedly did services and have denied working there at relevant times	Payments in periods when providers said that they did not work there
DHCC	5500 S. Damen, Chicago	President and agent	Dentist MW said that s/he worked there only for a few months in 2013.	Approximately \$144,237.75 for services from 2014 through 2016.
			Dentist SG said that s/he had not worked there since 2012	Approximately \$292,149.98 for services from 2013 through 2015
CD Dental Care	452 N Western, Chicago	Agent	Dentist AS recalled working for DHCC around April 2013 but not working for CD Dental Care	Approximately \$196,302 in payments for services in 2016 and 2017



Company	Address	MIR role, according to Secretary of State database	Providers who allegedly did services and have denied working there at relevant times	Payments in periods when providers said that they did not work there
EGDC	2451 W. 79 <sup>th</sup> St, Chicago	President and agent	Dentist KK denied ever working for EGDC	\$271,935 in payments for services allegedly by Dentist KK in 2017
FTDC	2413 S. State St, Chicago	Agent	Dentist KK denied ever working for FTDC	\$101,634 in payments for services allegedly by Dentist KK in 2017

9. As further described below, a fifth company associated with MIR has submitted in 2018 a credentialing application to DentaQuest claiming that Dentist KK works for the company. As discussed below, Dentist KK has denied working for that company as well, and the location given for Dentum Dental appears to be a vacant building.

10. In addition, multiple patients have contacted DentaQuest about procedures that were billed by Dentist AS, Dentist KK and Dentist MW but which the patient said were never done. For example, according to DentaQuest records of customer complaints, at least seven people have called DentaQuest to complain about services billed by DHCC that the people said were not done, including Individual BE, who is further discussed below.

#### **B. DHCC**

11. According to the Illinois Secretary of State's corporation database, DHCC was incorporated on March 18, 2011, identified FAIZAN MIR as the company's president and agent, and involuntarily dissolved in 2016. Employer contribution and wage reports filed by DHCC with the Illinois Department of Employment Security identify FAIZAN MIR as an employee in the third and fourth quarters of 2012 and in the first quarter of 2014.

12. In March 2018, agents interviewed Individual LB, who said that s/he had worked as a receptionist at DHCC from June 2014 until August 2015. S/he said that s/he worked at the practice Monday through Saturday from 9 am to 4 pm. S/he said that she greeted patients and kept track of patients' schedules using a scheduling book. S/he said that MIR was the office manager at DHCC, and that MIR did all of DHCC's billings.

13. Individual LB said that as far as s/he knew, Dentist KG was the only dentist who worked at DHCC when s/he worked there. Individual LB said that Dentist KG saw an average of 5-10 patients a day and 15-20 children a day when children returned to school. Individual LB said that s/he heard rumors that Dentist KG had lost his/her dental license and was still performing work on patients. According to the IDFPR's public online database, Dentist KG had his/her license as a dentist suspended effective September 1995 and had been disciplined.

14. According to claims data provided by DentaQuest, DHCC submitted claims for services purportedly performed by Dentist MW and Dentist SG at DHCC during the period of time during which Individual LB worked at DHCC. DHCC was paid approximately \$144,237 for claims for services allegedly by Dentist MW from 2014 through 2016. DHCC was also paid approximately \$292,150 on claims alleging that Dentist SG had provided services at DHCC from 2013 through 2015. As detailed in the following paragraphs, those claims were false because Dentist MW and Dentist SG, who have been interviewed by law enforcement, confirmed that they did not work for DHCC at the times of those alleged services.

15. Individual LB was asked about Dentist MW, in whose name DHCC had submitted claims to DentaQuest. When shown a photograph of Dentist MW, Individual LB said that s/he

did not recognize the photograph. When asked if the name of Dentist MW sounded familiar to her/him, Individual LB said the name was not familiar.

16. Law-enforcement agents interviewed Dentist MW in November 2016. Dentist MW said that s/he had applied for a job with DHCC and met with Zeshawn Ali, whom s/he understood was the office manager.<sup>1</sup> S/he said that Ali made copies of all of Dentist MW's credentials and offered him/her a position in December 2012. Dentist MW said that s/he had worked at DHCC from January 2013 through March 2013. Dentist MW said that s/he was the only practicing dentist in the office. S/he said that the volume of patients was low and that s/he quit because he was not making any money and because there were very few patients.

17. According to a credentialing application submitted by DHCC to DentaQuest in 2014, Dentist MW worked at DHCC, which did business at Dental Health Center and was located at 5500 S. Damen Avenue, Chicago, Illinois. According to the application, Dentist MW began working at that location on March 1, 2014. The credentialing application included signatures that purportedly were that of Dentist MW. When shown the credentialing application during the interview in June 2018, Dentist MW said that his/her alleged signature there was not his/hers.

18. One of the people who called DentaQuest to complain about services billed but not rendered is Individual BE. Individual BE called DentaQuest to complain about services that were allegedly done by Dentist MW, and Individual BE was interviewed by law enforcement in June 2018. Individual BE said that when s/he has gone for years to a dental practice located in Blue Island, Illinois. S/he said that when she went in 2016, s/he was informed that s/he could not get a routine cleaning because records indicated that s/he had already had the procedure done recently.

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<sup>1</sup> As described below in paragraph 24, MIR is also known as "Zeshawn Ali."



According to claims submitted to DentaQuest, Dentist MW purportedly performed multiple procedures on Individual BE during an August 6, 2015 visit, after which DHCC submitted claims to DentaQuest on August 6, 2015, and DHCC was paid a total of \$196.35 on those claims on August 11, 2015. Individual BE said that s/he did not get any dental services on April 6, 2015, and had never gone to the location for DHCC's offices. According to information provided by DentaQuest, Individual BE had dental coverage at the time through a managed care organization that was run by a private company and funded by Illinois Medicaid.

19. DHCC employee Individual LB was also asked about Dentist SG, in whose name DHCC had submitted claims to DentaQuest. When shown a photograph of Dentist SG, Individual LB said that s/he did not recognize the photograph. When asked if the name of Dentist SG sounded familiar to her/him, Individual LB said the name was not familiar.

20. A law-enforcement agent interviewed Dentist SG by telephone in June 2018. Dentist SG said that s/he had been living in Texas since 2014 and that s/he practices dentistry there. S/he said that s/he had worked at Dental Healthcare Center at 55<sup>th</sup> and Damen, but had not worked there since 2012.

**C. CD Dental Care**

21. According to the Illinois Secretary of State's corporation database, CD Dental Care was incorporated on May 10, 2016, identified FAIZAN MIR as the company's agent, identified Dentist AS as the company's president, and involuntarily dissolved in 2017. In a contribution and wage report filed by CD Dental Care with the Illinois Department of Employment Security, CD Dental Care reported having only one covered worker in the last three months of 2016. The report was signed by FAIZAN MIR, whose title was stated as president.

22. According to claims data provided by DentaQuest, CD Dental Care submitted claims indicating that a single dentist, Dentist AS, had purportedly provided services from June 2016 through March 2017.

23. Law enforcement agents interviewed Dentist AS in April 2017. Dentist AS said that s/he has her/his own dental practice in Mount Prospect, which she opened in 2016. When asked if s/he was familiar with CD Dental Care, Dentist AS said that s/he was not. S/he also said that she was not familiar with the 452 N. Western Avenue, the address associated with CD Dental Care.

24. Dentist AS said that s/he was familiar with FAIZAN MIR, whom s/he also knew by the names Zeshawn Ali and Shawn Williams. Dentist AS said that s/he responded to a job posting and met with MIR at DHCC, which was located at 5500 S. Damen Avenue, Chicago. S/he said that MIR introduced himself as the corporate manager who worked for approximately seven partners. MIR offered Dentist AS a position and said that s/he would be the only dentist at the practice. Dentist AS said that s/he worked for DHCC for three weeks in or around April 2013. According to Dentists AS, s/he saw approximately three or four patients a day. Dentist AS said that s/he was paid \$3,000 for the services that she did at DHCC.

25. According to a credentialing application submitted by CD Dental Care to DentaQuest, Dentist AS worked for CD Dental Care at 452 N. Western Avenue, Chicago, Illinois beginning on June 1, 2016. The credentialing application included signatures that purportedly were that of Dentist AS. When shown the credentialing application during the interview in June 2018, Dentist AS said that the signature was not his/hers.

26. According to a review of claims data provided by DentaQuest, CD Dental Care submitted claims to DentaQuest for dental services allegedly rendered by Dentist AS from August 2016 through March 2017. Based on the information provided by Dentist AS detailed above, those claims were false. According to claims data, health care programs administered by DentaQuest, including Illinois Medicaid, paid CD Dental Care approximately \$413,030.40 on those claims.

**D. EGDC and FTDC**

27. As discussed below, two additional companies connected to MIR – EGDC and FTDC – were paid approximately \$503,441 for dental services allegedly performed by a dentist, Dentist KK, who denied working for those companies.

28. According to the Illinois Secretary of State's corporation database, EGDC was incorporated on January 25, 2017 and identified FAIZAN MIR as the company's president and agent. The Illinois Department of Employment Security had no wage reports filed by EGDC. According to the Illinois Secretary of State's corporation database, FTDC was incorporated on July 10, 2017 and identified FAIZAN MIR as the company's agent. The Illinois Department of Employment Security had no wage reports filed by FTDC. In or around October 2017, DentaQuest received a provider update form that was signed by MIR and that provided a new bank account for payments to be sent.

29. According to claims data provided by DentaQuest, EGDC submitted claims indicating that it had provided services from February 2017 through December 2017 and that one dentists had worked there, Dentist KK. According to claims data, health care programs administered by DentaQuest, including Illinois Medicaid, paid EGDC approximately \$365,729.62 on those claims. As detailed below, those claims were false because Dentist KK did not work for EGDC.



30. Similarly, according to claims data provided by DentaQuest, FTDC submitted claims indicating that it had provided services from June 2017 through November 2017 and that one dentist had worked there, Dentist KK. According to claims data, health care programs administered by DentaQuest, including Illinois Medicaid, paid FTDC approximately \$137,711.46 on those claims. As also detailed below, those claims were false because Dentist KK did not work for FTDC.

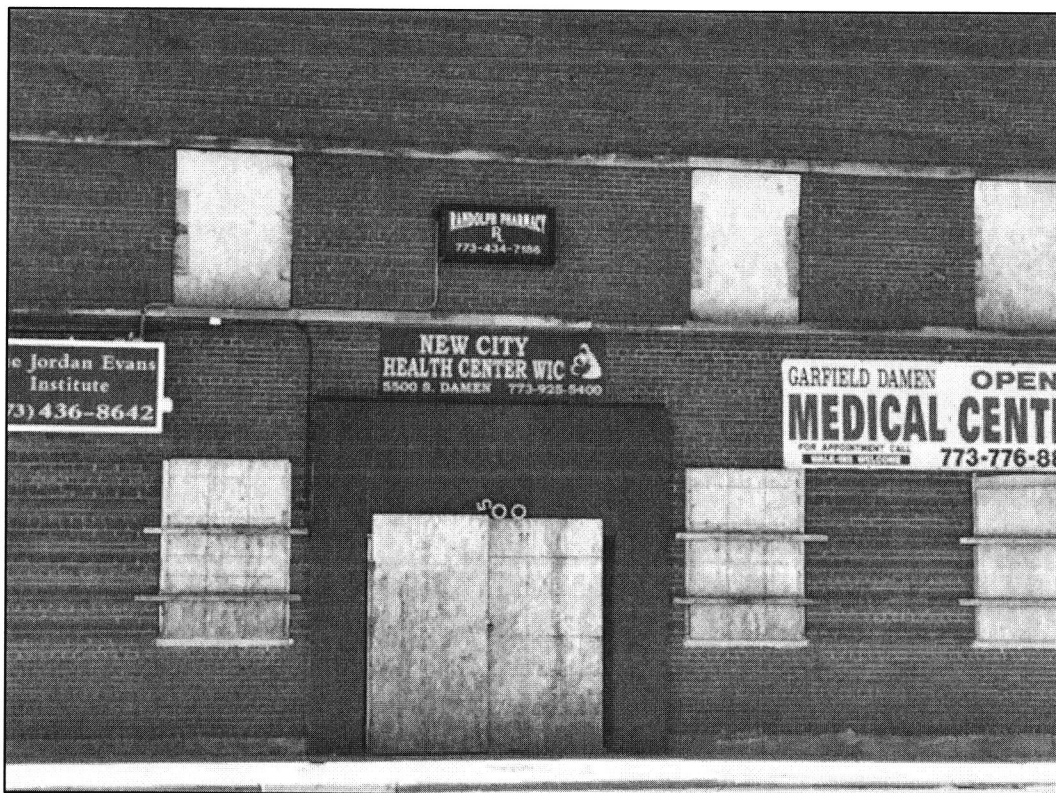
31. Law enforcement agents interviewed Dentist KK in March 2018. Dentist KK said that s/he retired from practicing dentistry full-time in 2009. Dentist KK said that s/he has worked two days a month at a dental practice for 10 years, which s/he referred to as “moonlighting.” Dentist KK said that this practice does not provide services to patients insured through Medicaid. Dentist KK said that s/he has never worked for or heard of EGDC or FTDC. When asked if s/he was familiar with the name FAIZAN MIR, Dentist KK said that s/he was not. When shown photographs of FAIZAN MIR, Dentist KK said that s/he did not recognize him.

**E. Dentum Dental**

32. In or around February 2018, DentaQuest received a credentialing application in the name of Dentist KK with a company called Dentum Dental Ltd. According to the application, the office manager for Dentum Dental is “Josh,” with no last name given. In or around May 2018, DentaQuest received another credentialing application in the name of Dentist KK with Dentum Dental.

33. Both applications identified MIR as the owner of Dentum Dental. The first application bears a signature in the name of MIR with the date of February 1, 2018. The second application bears a signature in the name of MIR with the date of May 29, 2018.

34. According to both applications, the location for Dentum Dental is 5500 S. Damen Avenue, which is the same address associated with DHCC. Both applications included the answer “yes” to the question, “Currently an active location?” A special agent from the Department of Health and Human Services – Office of Inspector General who is also working on this investigation has gone to 5500 S. Damen Avenue on two occasions in the time period in which Dentum Dental has been allegedly operating, on March 23, 2018 and on May 31, 2018. On both times, that agent observed the building to be boarded-up and saw that the doors were barred shut. On both times, the building appeared vacant to the agent. A photograph of the outside of 5500 S. Damen Avenue that the agent took on March 23 is below:



35. The Dentum Dental applications also provided an address for where correspondence should be sent which was different from the practice location. The address given



was a mailbox at a UPS store in Bolingbrook. According to records provided by the UPS Store pursuant to subpoena, the person who set up the account was FAIZAN MIR.

36. Also according to both Dentum Dental credentialing applications, Dentist KK was working at Dentum Dental at the time of the applications. The Dentum Dental applications submitted to DentaQuest included the alleged signature of Dentist KK, a copy of Dentist KK's license with the State of Illinois a copy of his controlled substance registration certificate with the Drug Enforcement Administration.

37. When asked specifically about Dentum Dental, Dentist KK said that s/he was not working there and was not familiar with that company. When shown the credentialing application submitted by Dentum Dental, Dentist KK said that the signature on the application was not his/hers.

38. The Dentum Dental applications listed a phone number of (312) 818-XXXX. The UPS Store service agreement with MIR also listed the number as his contact number. On June 19, 2018, a law-enforcement agent, posing as a representative of DentaQuest, left a message at the number on June 19, 2018. As of June 21, 2018, no one had returned the call.

39. According to a public database of Medicare providers, Dentum Dental received a national provider identification number in or around March 12, 2018.<sup>2</sup> According to the database, the telephone (312) 949-XXXX was given for Dentum Dental's practice location at 5500 S. Damen and MIR was identified as the practice's manager. On June 19, 2018, a law-enforcement agent, posing as a representative of DentaQuest, called that number. When a woman answered the phone,

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<sup>2</sup> A national provider identification number, or NPI, is a unique 10-digit number issued by the Centers for Medicare and Medicaid Services to health care providers in the United States.



the agent asked for MIR. The woman said that he was not there, then said that this was “an establishment,” and then hung up the phone. The agent called again. A different woman answered the phone, saying, “Cosmo Beauty.” When the agent asked for MIR, the woman first said that he was not going to be there that day, and then said that she did not know who the agent was talking about.

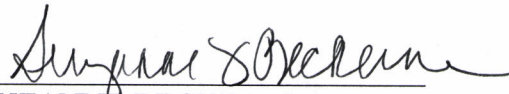
40. The Dentum Dental applications also listed an email address of dentumltd@gmail.com. In response to a subpoena, Google provided information about the IP address used to open the dentumltd@gmail.com account and to access the account from March through May 2018. In response to a subpoena, Comcast provided information about the IP address, identifying FAIZAN MIR as the subscriber to whom that IP address was assigned from March 9, 2018 through June 6, 2018 and the service address as a location in Bolingbrook, Illinois.

## **V. CONCLUSION**

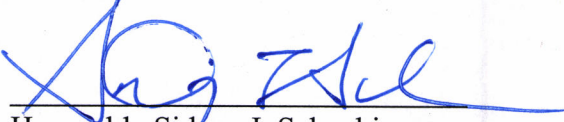
41. Based on the above information, I respectfully submit that there is probable cause to believe that beginning no later than 2013 and continuing until the present, FAIZAN MIR knowingly and willfully participated in a scheme to defraud health care benefit programs, including Illinois Medicaid, and to obtain, by means of false and fraudulent representations, money under the control of those programs in connection with the delivery of or payment for health care services, and, in execution of the scheme, on or about August 6, 2015, did knowingly cause to be submitted a false claim, specifically, a claim that Dentist MW performed a filling on August 6, 2015 for Patient BE, when defendant knew that no such service was actually provided, in violation

of Title 18, United States Code, Section 1347.

FURTHER AFFIANT SAYETH NOT.

  
SUZANNE BECKERMAN  
Special Agent, FBI

Subscribed and sworn  
before me this 26th day of June, 2018

  
Honorable Sidney I. Schenkier  
United States Magistrate Judge