

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA) No.
)
) Violation: Title 18, United States
) Code, Section 1347
)
SEUNG HAN LIM) **Under Seal**

The SPECIAL OCTOBER 2022 GRAND JURY charges:

1. At times material to this Indictment:
 - a. Defendant SEUNG HAN LIM was a licensed chiropractic physician in Illinois.
 - b. Chiropractor A was a licensed chiropractic physician in Illinois.
 - c. Defendant LIM owned and operated Movement Health and Rehab, also known as Motu Chiropractic and Motu Chiromassage (“Motu”), located in Libertyville, Illinois. Motu purported to provide chiropractic and therapeutic services to patients.
 - d. Blue Cross Blue Shield of Illinois (“BCBS”) was a health care benefit program, as defined in Title 18, United States Code, Section 24(b), that provided health insurance to individuals through individual health insurance plans and to groups of individuals through employer-sponsored health insurance plans. BCBS reimbursed health care providers when, among other criteria, those services were actually provided.
 - e. Defendant LIM and Chiropractor A were enrolled as providers with BCBS, and they each had a unique provider identification number.

f. To receive reimbursement for a covered service from BCBS, a health care provider had to submit a claim containing, among other things: the date of service; the location where the service was provided; the patient's name, diagnosis, insurance number, and date of birth; the health care service provided; the name and identification number of the provider who rendered the service; and the charge for each service provided.

g. BCBS paid for covered services for which a representation had been made that the services were provided to patients as stated on the claim.

h. BCBS prohibited claims from health care providers for health care services rendered to the provider or to their immediate family members, such as their spouses, children, siblings, and parents.

2. Beginning no later than January 2016, and continuing through in or around December 2019, at Libertyville, in the Northern District of Illinois, Eastern Division, and elsewhere,

SEUNG HAN LIM,

defendant herein, participated in a scheme to defraud a health care benefit program, namely BCBS, 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, a health care benefit program, in connection with the delivery of and payment for health care benefits and services, which scheme is further described in the following paragraphs.

3. It was part of the scheme that defendant LIM knowingly submitted, and caused to be submitted, fraudulent claims to BCBS that falsely represented that certain health care services were provided to patients as stated in the claims, when LIM knew that those services were not actually provided.

4. It was further part of the scheme that defendant LIM submitted to BCBS fraudulent claims for services that he purportedly provided to patients at Motu on dates when he, or the patient, was outside of Illinois.

5. It was further part of the scheme that defendant LIM submitted and caused to be submitted to BCBS claims for services purportedly rendered by Chiropractor A to LIM, LIM's wife, and LIM's parents, when LIM knew that the services were not actually provided by Chiropractor A, and that the claims would not have been paid if LIM was identified as the rendering provider.

6. It was further part of the scheme that, in response to a BCBS audit, defendant LIM prepared, and caused to be prepared, false and fraudulent patient medical records and documents, which purported to show that services had been provided to Motu patients by LIM and Chiropractor A, when, as LIM knew, the services had not been provided.

7. It was further a part of the scheme that defendant LIM knowingly submitted, and caused to be submitted, these false records and documents to BCBS in response to an audit.

8. It was further part of the scheme that defendant LIM deposited, and caused to be deposited, money that Motu received from BCBS into bank accounts that

defendant LIM controlled, including money he received from BCBS for claims for services that were not actually provided.

9. It was further part of the scheme that defendant LIM fraudulently obtained, and caused Motu to obtain, at least approximately \$430,000 in payments from BCBS.

10. It was further part of the scheme that defendant LIM concealed, misrepresented, and hid, and caused to be concealed, misrepresented, and hidden, the existence, purpose, and acts done in furtherance of the scheme.

11. On or about the dates set forth below, at Libertyville, in the Northern District of Illinois, Eastern Division, and elsewhere,

SEUNG HAN LIM,

defendant herein, knowingly and willfully executed and attempted to execute the above-described scheme by submitting and causing to be submitted to BCBS claims for health care services that were not actually provided, as follows:

COUNT	DATE OF CLAIM SUBMISSION	DATE OF PURPORTED SERVICE	PATIENT
One	08/27/2018	08/25/2018	D.L.
Two	08/27/2018	08/25/2018	K.L.
Three	08/27/2018	08/25/2018	J.L.
Four	08/27/2018	08/25/2018	LIM
Five	08/27/2018	08/26/2018	K.L.
Six	08/27/2018	08/26/2018	D.L.
Seven	08/27/2018	08/26/2018	J.L.
Eight	08/27/2018	08/26/2018	LIM
Nine	01/03/2019	12/31/2018	C.M.
Ten	02/11/2019	02/06/2019	R.M.P.
Eleven	05/23/2019	05/20/2019	R.M.P.
Twelve	05/30/2019	05/28/2019	R.M.P.

Thirteen	10/14/2019	10/06/2019	C.M.
Fourteen	10/14/2019	10/13/2019	V.Y.

In violation of Title 18, United States Code, Section 1347.

FORFEITURE ALLEGATION

The SPECIAL OCTOBER 2022 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 1347, as set forth in this Indictment, defendant shall forfeit to the United States of America any property that constitutes and is derived, directly and indirectly, from the gross proceeds traceable to the commission of the offense, as provided in Title 18, United States Code, Section 982(a)(7).

2. If any of the property described above, as a result of any act or omission by defendant: cannot be located upon exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

for MP
ACTING UNITED STATES ATTORNEY