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1:23-cr-00544

Judge Nancy L. Maldonado
Magistrate Judge Gabriel A. Fuentes

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Oct 12, 2023

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)

v.)

ALISHA RICHARDSON)

) Violation: Title 18, United States
) Code, Section 1343
)

COUNTS ONE THROUGH SEVEN

The SPECIAL JANUARY 2023 GRAND JURY charges:

1. At times material to this Indictment:

a. Nursing Home 1 was a nursing and rehabilitation facility located in Forest Park, Illinois. Nursing Home 1 was owned and operated by Business 1.

b. Nursing Home 1 was an entity providing medical benefits and services to patients. Nursing Home 1 received payment for those benefits and services pursuant to public and private plans and contracts for medical benefits, including from Medicare.

c. Defendant ALISHA RICHARDSON was a resident of Chicago, Illinois. RICHARDSON was employed as a Scheduler at Nursing Home 1.

d. Nursing Home 1 employed Certified Nursing Assistants ("CNAs") to assist in patient care.

e. RICHARDSON was a department head who had the authority to hire new CNAs.

f. Individual A was employed as a Human Resources ("HR") Specialist at Nursing Home 1.

g. Nursing Home 1 employed a timecard system that required certain employees, including CNAs, to scan their hand in a machine at the beginning and end of every shift.

h. CNAs would scan their hand into the timecard system at the beginning of their employment at Nursing Home 1, and the scan was associated with an individualized code for each employee.

i. At the beginning of a shift, CNAs were required to scan into the timecard system using their hand and their individual code, which would record their start time. They were similarly required to scan out with their hand and individual code, and the timecard system would record the end time for the associated employee. This information was transmitted into the payroll system and was used to determine the number of hours worked and the employee's pay.

j. If an employee missed punching in at the beginning or end of their shift, their department head could submit a Missed Punch Form to Individual A, which would prompt Individual A to enter the employee's hours into the payroll system.

k. Nursing Home 1 made payments to CNAs based on the number of hours worked and the employee's pay rate as a result of the information entered into the payroll system.

2. Beginning in or around October 2017, and continuing through in or around April 2019, at Forest Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

ALISHA RICHARDSON,

defendant herein, knowingly devised, intended to devise, and participated in a scheme to defraud and to obtain money and property from Nursing Home 1 by means of materially false and fraudulent pretenses, representations, and promises, as further described below.

3. It was part of the scheme that defendant ALISHA RICHARDSON unlawfully enriched herself by causing Business 1 to issue more than \$100,000 in payments for hours that RICHARDSON caused to be fraudulently entered into Nursing Home 1's payroll system, and then collected a portion of those payments for her own use.

4. It was further part of the scheme that RICHARDSON falsified Nursing Home 1's records to make it appear as though multiple individuals were employed as CNAs at Nursing Home 1, when in fact they were not ("ghost" employees).

5. It was further part of the scheme that RICHARDSON used a manager code for the timecard machine at Nursing Home 1 to link her own handprint to the individualized codes for employees whose records RICHARDSON had falsified and who did not actually work at Nursing Home 1.

6. It was further part of the scheme that RICHARDSON used her own hand to log hours for these "ghost" employees, causing Nursing Home 1's payroll system to log false work hours for the "ghost" employees.

7. It was further part of the scheme that RICHARDSON falsified Missed Punch Forms and submitted them to Individual A, causing Individual A to log false work hours for “ghost” employees into Nursing Home 1’s payroll system.

8. It was further part of the scheme that Nursing Home 1’s payroll system generated paychecks and issued direct deposits for “ghost” employees based on the false work hours input by RICHARDSON.

9. It was further part of the scheme that “ghost” employees were issued payroll checks and direct deposits when they were not actually employed at Nursing Home 1, and at times while they were actually employed elsewhere during the time they purportedly worked at Nursing Home 1.

10. It was further part of the scheme that “ghost” employees cashed paychecks from Nursing Home 1 for work they had not performed, and that, at times, they shared the proceeds with RICHARDSON.

11. It was further part of the scheme that RICHARDSON endorsed some of the paychecks, including by forging the endorsement signatures of “ghost” employees, and deposited them into bank accounts to which she had access.

12. It was further part of the scheme that RICHARDSON caused direct deposits from Nursing Home 1 for a “ghost” employee to be issued to a bank account to which RICHARDSON had access.

13. It was further part of the scheme that, as a result of false timesheets that RICHARDSON submitted and caused to be submitted for “ghost” employees, Nursing Home 1 paid over \$100,000 for work that was never performed.

14. On or about each of the dates set forth below, at Forest Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

ALISHA RICHARDSON,

defendant herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, electronic funds transfers from Business 1 bank accounts, reflecting payment for hours fraudulently entered into Nursing Home 1's payroll system, which were processed through servers located outside of Illinois, each such transfer constituting a separate count:

Count	Check Number (if applicable)	Location Cashed/Account Received	Approximate Date	Amount
One	#29561874	Calumet Park, Illinois	2/13/2019	\$1,046.07
Two	#29561882	Calumet Park, Illinois	2/13/2019	\$1,667.50
Three	#29649286	Chicago, Illinois	2/27/2019	\$1,625.90
Four	N/A	Metabank -8201	3/13/2019	\$1,203.47
Five	#29732455	Calumet Park, Illinois	3/13/2019	\$1,673.73
Six	#29912081	JP Morgan Chase -1895	4/10/2019	\$2,091.38
Seven	#29912065	Calumet Park, Illinois	4/10/2019	\$1,422.30

In violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2023 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1343, as set forth in this Indictment, defendant ALISHA RICHARDSON shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes but is not limited to a personal monetary judgment in an amount equal to the proceeds derived from the offense in violation of Title 18, United States Code, Section 1343, estimated to be approximately \$103,094.01.

3. If any of the property described above, as a result of any act or omission by the defendant: cannot be located upon the 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

ACTING UNITED STATES ATTORNEY

DIRECTOR,
CONSUMER PROTECTION BRANCH
DEPARTMENT OF JUSTICE