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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Judge Sara L. Ellis
Magistrate Judge M. David Weisman
RANDOM / Cat. 3

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

SHAWN BASHIR

UNDER SEAL

Case No. **1:25-cr-00538**

Violations: Title 18, United States Code,
Sections 1028A and 1347

COUNTS ONE THROUGH EIGHT

The SPECIAL APRIL 2024 GRAND JURY charges:

1. At times material to this indictment:

a. Defendant SHAWN BASHIR was a resident of Grayslake, Illinois. BASHIR controlled Success for Kids and Growing Kids Therapy, which purportedly provided early intervention services to children.

b. BASHIR had control and signature authority on bank accounts that received funds on behalf of Success for Kids and Growing Kids Therapy, including a Capital One Bank account ending in 5293 (the "Capital One Bank Account") and a U.S. Bank account ending in 4210 (the "U.S. Bank Account").

c. Victim Company A was a health care benefit program, as defined in Title 18, United States Code, Section 24(b), that provided health care benefits to eligible children, including certain early intervention services. Early intervention services included developmental evaluations and assessments, physical therapy, occupational therapy, speech/language therapy, and psychological services. Eligible

children who received health care benefits from Victim Company A were referred to as beneficiaries.

d. Therapists T.Y. and P.A. were licensed providers of early intervention services who each had National Provider Identifiers, which were numbers assigned to healthcare providers and used by health care benefit programs.

e. Success for Kids and Growing Kids Therapy were enrolled as providers with Victim Company A.

f. To be an enrolled provider with Victim Company A, a provider had to submit or cause to be submitted various enrollment documents, including a roster containing identifying and administrative information for each of the health care professionals rendering services on behalf of the provider.

g. To receive payment for early intervention services covered by Victim Company A, enrolled providers were required to submit certain claim information to Victim Company A for reimbursement for covered services provided to beneficiaries. Required claim information included the beneficiary's name; insurance number and date of birth; the services provided; the location where the services were provided; the name and National Provider Identifier of the provider; and the charge for each service provided.

h. Victim Company A paid for early intervention services that were covered by a beneficiary's insurance policy and for which a representation had been made that the services were actually provided to the beneficiary.

2. Beginning no later than in or around January 2019, and continuing until at least in or around May 2025, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAWN BASHIR,

defendant herein, participated in a scheme to defraud a health care benefit program, namely Victim Company A, 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, items, and services, which scheme is further described below.

3. It was part of the scheme that BASHIR submitted, and caused to be submitted, false and fraudulent claims for payment on behalf of Success for Kids and Growing Kids Therapy to Victim Company A that represented that certain early intervention services had been rendered, including by Therapists T.Y., P.A., and others, to beneficiaries, knowing that those services had not actually been provided.

4. It was further part of the scheme that BASHIR submitted, and caused to be submitted, provider enrollment documents to Victim Company A representing that certain therapists were rendering services on behalf of Success for Kids and Growing Kids Therapy, including Therapists T.Y. and B.A., when BASHIR knew that those therapists were not rendering services on behalf of Success for Kids or Growing Kids Therapy.

5. It was further part of the scheme that BASHIR submitted and caused the submission of approximately \$17.3 million in false and fraudulent claims by Success for Kids and Growing Kids Therapy to Victim Company A, of which Victim Company A paid at least approximately \$1.4 million to Success for Kids and Growing Kids Therapy for early intervention services that were not provided.

6. It was further part of the scheme that, after payments for the false and fraudulent claims were made by Victim Company A to Success for Kids and Growing Kids Therapy, BASHIR converted the funds to his own use , including by withdrawing funds and transferring funds to other accounts BASHIR controlled.

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

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

SHAWN BASHIR,

defendant herein, did knowingly and willfully execute and attempt to execute the above-described scheme by submitting and causing to be submitted claims to a health care benefit program, namely Victim Company A, seeking payment for early intervention services that were not actually provided, each such submission constituting a separate count:

Count	Beneficiary	Claim Submission Date	Claim Date of Service	Provider	Amount Billed	Amount Paid
One	D.B.	04/06/21	12/24/20	Success for Kids	\$200.00	\$103.23
Two	G.Z.	05/12/21	12/28/20	Success for Kids	\$200.00	\$99.69
Three	D.L.	02/13/23	12/22/22	Success for Kids/Therapist P.A.	\$200.00	\$74.70
Four	A.T.	02/13/23	12/18/22	Success for Kids/Therapist T.Y.	\$200.00	\$104.08
Five	D.B.	12/27/23	09/06/22	Growing Kids Therapy	\$200.00	\$79.76
Six	G.Z.	12/27/23	11/24/22	Growing Kids Therapy	\$200.00	\$129.08
Seven	A.T.	12/28/23	01/01/23	Growing Kids Therapy	\$200.00	\$95.64
Eight	D.L.	02/02/24	11/26/23	Growing Kids Therapy	\$200.00	\$102.20

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

COUNT NINE

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about February 13, 2023, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAWN BASHIR,

defendant herein, did knowingly transfer, possess, and use without lawful authority a means of identification of another person, namely, the name and National Provider Identifier of Therapist P.A., during and in relation to a felony, namely a violation of Title 18, United States Code, Section 1347, as alleged in Count Three of the Indictment;

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT TEN

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about February 13, 2023, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAWN BASHIR,

defendant herein, did knowingly transfer, possess, and use without lawful authority a means of identification of another person, namely, the name and National Provider Identifier of Therapist T.Y., during and in relation to a felony, namely a violation of Title 18, United States Code, Section 1347, as alleged in Count Four of the Indictment;

In violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE ALLEGATION

The SPECIAL APRIL 2024 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 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. The property to be forfeited includes, but is not limited to, a personal money judgment in the amount of at least approximately \$1.4 million.

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

UNITED STATES ATTORNEY