

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

LATRICE HARRELL

Violations: Title 18, United States
Code, Sections 1028A, 1035, and 1347

COUNT ONE

The SPECIAL JULY 2018 GRAND JURY charges:

1. At times material to this Indictment:

a. Defendant LATRICE HARRELL was the executive director and operator of The Champion Center for Autism, Inc., located in Oak Forest, Illinois, which purported to provide therapeutic services to patients through licensed providers.

b. Individual A was a licensed occupational therapist and Individual B was a certified behavioral analyst.

c. A National Provider Identifier (“NPI”) was a unique identification number issued to health care providers that all health care providers were required to use when submitting claims to a health care benefit program for reimbursement for services rendered to a patient covered by the health care benefit program.

d. Blue Cross Blue Shield of Illinois was an insurance company that offered and administered health care benefit programs, within the meaning of Title 18, United States Code, Section 24(b).

e. A health care provider such as The Champion Center for Autism had to submit a claim form to Blue Cross Blue Shield of Illinois in order to receive reimbursement for covered services. Blue Cross Blue Shield of Illinois required that each claim contain, among other things: the dates of service; the patient's name, diagnosis, insurance number, and date of birth; the health care services provided; the rendering provider's NPI number; and the charge for each service provided.

f. Blue Cross Blue Shield of Illinois paid for covered services for which a representation had been made that the services were provided to patients.

2. Beginning on or about November 2, 2015, and continuing through on or about May 15, 2018, at Oak Forest, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATRICE HARRELL,

defendant herein, participated in a scheme to defraud a health care benefit program, namely Blue Cross Blue Shield of Illinois, and to obtain by means of materially false and fraudulent pretenses, representations, and promises, money owned by and under the custody and control of that health care benefit program in connection with the delivery of and payment for health care services, as further described below.

3. It was part of the scheme that defendant LATRICE HARRELL submitted, and caused to be submitted, fraudulent claims, totaling at least approximately, \$3,000,000 to Blue Cross Blue Shield of Illinois that falsely represented that certain health care services were provided to patients at The Champion Center for Autism by Individual A and Individual B, when defendant HARRELL knew that those services were not provided.

4. It was further part of the scheme that defendant LATRICE HARRELL obtained the NPI numbers for Individuals A and B respectively, and, without their knowledge or consent, used their NPI numbers to submit, and cause the submission of, false claims to Blue Cross Blue Shield of Illinois.

5. It was further part of the scheme that when submitting, and causing the submission of, fraudulent claims to Blue Cross Blue Shield of Illinois for services purportedly provided by Individual A and Individual B at The Champion Center for Autism, defendant LATRICE HARRELL used the names and NPI numbers of Individual A and Individual B to falsely represent in the claims that Individual A and Individual B had provided the services when defendant HARRELL knew that no such services had been provided.

6. It was further part of the scheme that, when Blue Cross Blue Shield of Illinois paid the fraudulent claims that defendant LATRICE HARRELL submitted and caused to be submitted, defendant HARRELL deposited and caused to be

deposited the money she received from Blue Cross Blue Shield of Illinois into bank accounts in her name and controlled by her.

7. It was further part of the scheme that, on or about July 15, 2018, when Blue Cross and Blue Shield of Illinois asked defendant LATRICE HARRELL to provide documentation of services purportedly provided by Individual A and Individual B for which Blue Cross Blue Shield of Illinois had paid claims, defendant HARRELL provided Blue Cross and Blue Shield with false documentation purportedly prepared and signed by Individual A and Individual B, which defendant HARRELL knew was false.

8. It was further part of the scheme that the documentation defendant LATRICE HARRELL provided to Blue Cross Blue Shield of Illinois falsely represented that Individual A and Individual B had conducted patient evaluations, created plans of care for patients, and performed occupational therapy and/or behavioral therapy for patients at The Champion Center for Autism when defendant HARRELL knew that no such services had been provided.

9. It was further part of the scheme that, without the knowledge or consent of Individual A or Individual B, defendant LATRICE HARRELL caused the false documentation submitted to Blue Cross Blue Shield of Illinois to contain the names, NPI numbers, and forged signatures of Individual A and Individual B.

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

11. As a result of the scheme, defendant LATRICE HARRELL obtained at least approximately \$1,600,000 from Blue Cross Blue Shield of Illinois as a result of the false claims defendant LATRICE HARRELL submitted and caused to be submitted to Blue Cross Blue Shield of Illinois.

12. On or about August 14, 2017, at Oak Forest, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATRICE HARRELL,

defendant herein, knowingly and willfully executed the scheme, and attempted to do so, by submitting and causing to be submitted to Blue Cross Blue Shield of Illinois a claim seeking payment for The Champion Center for Autism, specifically a claim for services purportedly rendered by Individual A to Patient E.W. on or about August 1, 2017;

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

COUNT TWO

The SPECIAL JULY 2018 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One of the Indictment are incorporated here.

2. On or about August 2, 2017, at Oak Forest, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATRICE HARRELL,

defendant herein, knowingly and willfully executed the scheme, and attempted to do so, by submitting and causing to be submitted to Blue Cross Blue Shield of Illinois a claim seeking payment for The Champion Center for Autism, specifically a claim for services purportedly rendered by Individual A to Patient M.T. on or about July 1, 2017;

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

COUNT THREE

The SPECIAL JULY 2018 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One of the Indictment are incorporated here.

2. On or about May 30, 2017, at Oak Forest, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATRICE HARRELL,

defendant herein, knowingly and willfully executed the scheme, and attempted to do so, by submitting and causing to be submitted to Blue Cross Blue Shield of Illinois a claim seeking payment for The Champion Center for Autism, specifically a claim for services purportedly rendered by Individual A to Patient A.H. on or about May 1, 2017;

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

COUNT FOUR

The SPECIAL JULY 2018 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One of the Indictment are incorporated here.

2. On or about May 30, 2017, at Oak Forest, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATRICE HARRELL,

defendant herein, knowingly and willfully executed the scheme, and attempted to do so, by submitting and causing to be submitted to Blue Cross Blue Shield of Illinois a claim seeking payment for The Champion Center for Autism, specifically a claim for services purportedly rendered by Individual B to Patient M.T. on or about April 1, 2017;

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

COUNT FIVE

The SPECIAL JULY 2018 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One of the Indictment are incorporated here.

2. On or about April 4, 2017, at Oak Forest, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATRICE HARRELL,

defendant herein, knowingly and willfully executed the scheme, and attempted to do so, by submitting and causing to be submitted to Blue Cross Blue Shield of Illinois a claim seeking payment for The Champion Center for Autism, specifically a claim for services purportedly rendered by Individual A to Patient R.T. on or about January 20, 2017;

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

COUNT SIX

The SPECIAL JULY 2018 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One of the Indictment are incorporated here.

2. On or about October 20, 2016, at Oak Forest, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATRICE HARRELL,

defendant herein, knowingly and willfully executed the scheme, and attempted to do so, by submitting and causing to be submitted to Blue Cross Blue Shield of Illinois a claim seeking payment for The Champion Center for Autism, specifically a claim for services purportedly rendered by Individual B to Patient K.H. on or about October 1, 2016;

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

COUNT SEVEN

The SPECIAL JULY 2018 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One of the Indictment are incorporated here.

2. On or about September 21, 2016, at Oak Forest, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATRICE HARRELL,

defendant herein, knowingly and willfully executed the scheme, and attempted to do so, by submitting and causing to be submitted to Blue Cross Blue Shield of Illinois a claim seeking payment for The Champion Center for Autism, specifically a claim for services purportedly rendered by Individual B to Patient R.T. on or about November 5, 2015;

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

COUNT EIGHT

The SPECIAL JULY 2018 GRAND JURY further charges:

1. Paragraph 1(a) through (f) of Count One of this Indictment are incorporated here.

2. On or about June 15, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATRICE HARRELL,

defendant herein, knowingly and willfully made and caused to be made a materially false, fictitious, and fraudulent statement and representation, and made and caused to be made a materially false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and representation, in a matter involving a health care benefit program in connection with the payment for health care benefits and services, namely, a statement that Individual A approved and signed an occupational therapy evaluation for Patient E.W. on or about February 9, 2018;

In violation of Title 18, United States Code, Section 1035(a)(2).

COUNT NINE

The SPECIAL JULY 2018 GRAND JURY further charges:

1. Paragraph 1(a) through (f) of Count One of this Indictment are incorporated here.

2. On or about June 15, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATRICE HARRELL,

defendant herein, knowingly and willfully made and caused to be made a materially false, fictitious, and fraudulent statement and representation, and made and caused to be made a materially false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and representation, in a matter involving a health care benefit program in connection with the payment for health care benefits and services, namely, a statement that Individual B approved and signed an applied behavioral analysis plan of care for Patient K.H. on or about April 26, 2017;

In violation of Title 18, United States Code, Section 1035(a)(2).

COUNT TEN

The SPECIAL JULY 2018 GRAND JURY further charges:

1. Paragraph 1(a) through (f) of Count One of this Indictment are incorporated here.

2. On or about June 15, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATRICE HARRELL,

defendant herein, did knowingly use, without lawful authority, a means of identification of another person, namely, the name and National Provider Identification for Individual A, during and in relation to a felony violation, namely, a violation of Title 18, United States Code, Section 1035, as alleged in Count Eight of this Indictment;

In violation of Title 18, United States Code, Section 1028A.

COUNT ELEVEN

The SPECIAL JULY 2018 GRAND JURY further charges:

1. Paragraph 1(a) through (f) of this Indictment are incorporated here.
2. On or about June 15, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATRICE HARRELL,

defendant herein, did knowingly use, without lawful authority, a means of identification of another person, namely, the name and National Provider Identification for Individual B, during and in relation to a felony, namely, a violation of Title 18, United States Code, Section 1035, as alleged in Count Nine of this Indictment;

In violation of Title 18, United States Code, Section 1028A.

FORFEITURE ALLEGATION

The SPECIAL JULY 2018 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 1035 and 1347, as alleged in the Indictment, defendant shall forfeit to the United States any property that constitutes and is derived, directly and indirectly, from gross proceeds traceable to the commission of the offense, as provided in Title 18, United States Code, Section 982(a)(7).

2. Upon conviction of an offense in violation of Title 18, United States Code, Sections 1028A, as alleged in the Indictment, defendant shall forfeit to the United States any property that was used or intended to be used to commit, to facilitate, or to promote the commission of such offense, or constituting, derived from, or traceable to the gross proceeds that the defendant obtained directly or indirectly as a result of the offense, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(8).

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 under the provisions of Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY