

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA) Violations: Title 8, United States
) Code, Sections 1324(a)(3)(A), and
 v.) Title 18, United States Code,
) Section 2
CLINTON ROY PERKINS and)
CHRISTOPHER J. REINDL) **INFORMATION**

THE UNITED STATES ATTORNEY charges:

1. At times material to this information:
 - a. Anna II, Inc. (“Anna II”) and Can Do It, Inc. (“Can Do It”) (collectively “Anna II/Can Do It”) were businesses incorporated in the State of Illinois with their principal place of business at 801 Golf Lane in Bensenville, Illinois.
 - b. Anna II/Can Do It supplied temporary labor services for clients that operated warehouses in the suburbs of Chicago. The temporary laborers supplied by Anna II/Can Do It provided both skilled and unskilled labor, including janitorial services, loading and unloading of freight packages and merchandise, and installation or removal of structures within warehouses.
 - c. CLINTON ROY PERKINS was the president and secretary of Anna II/Can Do It.
 - d. CHRISTOPHER J. REINDL was the son-in-law of CLINTON ROY PERKINS and was an employee of Anna II/Can Do It. REINDL primarily worked in the Bensenville office of Anna II/Can Do It and performed a variety of tasks, including clerical, administrative, payroll, and office management tasks.

e. CLINTON ROY PERKINS entered into contractual agreements on behalf of Anna II/Can Do It with warehouse operators for the provision of temporary labor services.

f. CLINTON ROY PERKINS hired dozens of aliens (“the aliens”) to work as employees of Anna II/Can Do It and directed the aliens to perform temporary labor services at warehouses of other companies operating in the suburbs of Chicago.

g. CLINTON ROY PERKINS and CHRISTOPHER J. REINDL failed to require the aliens whom PERKINS hired to provide documentation of their immigration status or lawful right to hold employment in the United States.

h. CLINTON ROY PERKINS and CHRISTOPHER J. REINDL transported and directed low-level supervisory employees of Anna II/Can Do It to transport aliens employed by Anna II/Can Do It back and forth between locations near the aliens’ residences in Chicago and worksites in the suburbs of Chicago.

i. CLINTON ROY PERKINS and CHRISTOPHER J. REINDL responded to inquiries from Company A seeking the Social Security numbers for employees of Anna II/Can Do It by providing Company A with six-digit numbers for certain aliens designed to be the last six digits of the aliens’ Social Security numbers when, in fact, as defendants knew and had reason to know, the aliens in their employ were in the United States unlawfully and did not possess Social Security numbers.

j. CLINTON ROY PERKINS and CHRISTOPHER J. REINDL repeatedly withdrew funds in the amount of \$9,800 from bank accounts with First American Bank and LaSalle Bank, including multiple \$9,800 withdrawals on the same

day, in order to pay the wages of the aliens employed by Anna II/Can Do It. Defendants structured their cash withdrawals to be less than \$10,000 because they believed that doing so would avoid triggering the banks' reporting requirements.

k. CLINTON ROY PERKINS and CHRISTOPHER J. REINDL paid the aliens employed by Anna II/Can Do It in cash.

1. CLINTON ROY PERKINS and CHRISTOPHER J. REINDL failed to deduct payroll taxes or other withholdings from the wages paid to the aliens employed by Anna II/Can Do It.

2. Beginning no later than on or October 31, 2006 and continuing until on or about October 31, 2007, at Bensenville, in the Northern District of Illinois, Eastern Division, and elsewhere,

CLINTON ROY PERKINS and
CHRISTOPHER J. REINDL,

defendants herein, during the 12-month period between October 31, 2006 and October 31, 2007, knowingly hired for employment at least 10 individuals with actual knowledge that the individuals were unauthorized aliens who had been brought into the United States in violation of law;

In violation of Title 8, United States Code, Section 1324(a)(3)(A), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

The UNITED STATES ATTORNEY further alleges:

1. The allegations of this Information are re-alleged and fully incorporated herein for the purpose of alleging forfeiture to the United States pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(6)(A).

2. As a result of the violation of Title 8, United States Code, Section 1324(a)(3)(A) alleged in the foregoing Information,

CLINTON ROY PERKINS,

defendant herein, shall forfeit to the United States any and all right, title, and interest he may have in any property, real and personal, which constitutes and is derived from proceeds traceable to the offense as charged in the Information.

3. The interests of defendant CLINTON ROY PERKINS subject to forfeiture to the United States pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(6)(A) as incorporated by Title 28, United States Code, Section 2461(c), include but are not limited to a total of approximately \$488,095 in United States currency, broken down in the following approximate amounts: (1) \$10,339 in First American Bank account number 1013234104; (2) \$47,436 in First American Bank account number 1010543004; (3) \$157,360 in LaSalle Bank account number 5201505467; (4) \$905 in LaSalle Bank account number 1452000944; (5) \$100,000 in LaSalle Bank account number 4806633550; (6) \$63,038 in American Chartered Bank account 1281158; and (7) \$109,015 seized from 801 Golf Lane, Bensenville, Illinois.

4. If any of the forfeitable property described above, as a result of any act or omission by the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. 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 pursuant to the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(6)(A).

UNITED STATES ATTORNEY