

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
)	No.
v.)	
)	Violations: Title 18, United States Code,
)	Section 1001(a)(2)
LEON MOORE)	
)	

The UNITED STATES ATTORNEY charges:

1. At times material to this information:

a. The City of Chicago (the “City”) was a unit of local government known as a municipal corporation, and a political subdivision of the State of Illinois. The functions and services provided by the City on behalf of its residents were coordinated through various agencies and departments. One of the City’s operational departments was the Department of Procurement Services (the “DPS”).

b. Pursuant to an ordinance passed by the City in 1990, Chapter 2-92-420 *et seq.* of the amended Municipal Code, the City established a Minority and Women Owned Business Enterprise Procurement Program to promote minority- and women-owned businesses by modifying the City’s procurement practices and policies.

c. The City’s Minority and Women Owned Business Enterprise Procurement Program was administered by the DPS, which, among other things, was responsible for the initial certification and subsequent annual re-certification of minority- and women-owned businesses.

d. Applicants seeking a Minority Business Enterprise (“MBE”) certification

status from the City were required to submit a document entitled “Schedule A - Certification Declaration Affidavit for Disadvantaged Business Enterprise (DBE) Minority Business Enterprise (MBE) Woman Business Enterprise (WBE)” (“Schedule A”) as part of their initial application package to the DPS.

e. Defendant LEON MOORE was employed with the City and worked in the DPS from in or around July 1996 to in and around November 2005. While he worked at the DPS, MOORE was responsible for reviewing applications for MBE/WBE certification status submitted to the City, among other things. From in and around 2000 through in and around 2003, MOORE held the position of Chairman of the Certification Committee. As Chairman of the Certification Committee, MOORE had the ability to “expedite” review and certification of an application for MBE certification status submitted to the City.

2. In 2009, the Federal Bureau of Investigation was investigating corruption and fraudulent conduct relating to the minority certification of certain businesses in the City of Chicago, including the status of Illinois Cable Services Inc. (“the Investigation”). As of March 19, 2009, the following matter, among others was material to the Investigation: Whether defendant LEON MOORE accepted bribes or payoffs in return for certifying or expediting the review or certification of companies including Illinois Cable Services, Inc. as a MBE/WBE.

3. On or about March 19, 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LEON MOORE,

defendant herein, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of

Investigation, an agency within the executive branch of the Government of the United States, when he stated in sum and substance that he never accepted anything in return for prioritizing or expediting the review or certification of an application for a minority certification, when in truth and fact, as defendant then knew, this statement was false;

In violation of Title 18, United States Code, Section 1001(a)(2).

UNITED STATES ATTORNEY