

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	No.
	)	
v.	)	
	)	
GLORIA HARPER,	)	
ALICE SHERROD,	)	Violations: Title 18, United States
DERRICK EUBANKS,	)	Code, Sections 666, 1343, 1346, and
TOMMIE BODDIE, and	)	2; Title 26, United States Code,
BARRETT WHITE	)	Section 7206(1)

**COUNT ONE**

The SPECIAL MARCH 2010 GRAND JURY charges:

1. At times material to this indictment:

(a) The North Chicago Community Unit School District 187 (“NCSD”) was a quasi-municipal corporation organized under the Illinois School Code (105 ILCS 5/11A-2).

(b) The NCSD School Board was a body politic and corporate and was the governing body of the NCSD (105 ILCS 5/10-1, *et seq.*). Members of the School Board were elected to their positions.

(c) GLORIA HARPER was a member of the NCSD School Board from approximately 1999 to approximately May 2009.

(d) ALICE SHERROD was the NCSD’s Director of Transportation from approximately 2001 to approximately July 2010.

(e) T&M Transportation (“T&M”) was a company owned at least in part and controlled by TOMMIE BODDIE. T&M was in the business of transporting students for school districts that included NCSD. From approximately the late 1990s until approximately mid-2003, T&M was paid by the NCSD to transport students.

(f) Eubanks Transportation was a company owned at least in part and controlled by DERRICK EUBANKS. Eubanks Transportation was in the business of transporting students for school districts that included the NCSD. From approximately the late 1990s until approximately mid-2003, Eubanks Transportation was paid by the NCSD to transport students.

(g) Pursuant to Title 26, United States Code, Section 162(c), a business could not claim a business expense for any payment made, directly or indirectly, to an official or employee of any government, or of any agency or instrumentality of any government, if the payment constituted an illegal bribe or kickback.

#### The Scheme

2. Beginning no later than in or about 2001, and continuing until at least in or about August 2010, in the Northern District of Illinois, Eastern Division, and elsewhere,

GLORIA HARPER,  
ALICE SHERROD,  
DERRICK EUBANKS,  
TOMMIE BODDIE,  
and BARRETT WHITE,

defendants herein, devised, intended to devise and participated in a scheme to defraud and deprive the citizens of North Chicago and the NCSD of their right to the honest and faithful services of defendants GLORIA HARPER and ALICE SHERROD through bribery and kickbacks, and to obtain money and property by means of materially false and fraudulent pretenses, representations, promises, and material omissions, which scheme is described herein.

3. It was part of the scheme to defraud that defendants GLORIA HARPER and ALICE SHERROD secretly used their positions to enrich themselves by soliciting and accepting gifts, payments, and other things of value from defendants TOMMIE BODDIE, DERRICK EUBANKS,

and BARRETT WHITE in exchange for favorable official action regarding student transportation contracts.

4. It was further part of the scheme that in about 2001, defendants GLORIA HARPER and ALICE SHERROD met with defendant TOMMIE BODDIE and told him they would arrange for the NCSD to increase the number of students that T&M would transport, thus increasing T&M's revenues, in return for HARPER and SHERROD receiving money from BODDIE. BODDIE agreed to make payments to HARPER and SHERROD in return for NCSD assigning more students for T&M to transport.

5. It was further part of the scheme that defendant TOMMIE BODDIE provided money to defendants GLORIA HARPER and ALICE SHERROD pursuant to his agreement with them. BODDIE initially provided them approximately \$4,000 to \$5,000 in cash each month. BODDIE usually delivered the cash directly to HARPER and relied on HARPER to give SHERROD her share of the money. Sometimes, however, BODDIE gave cash directly to SHERROD. By 2003, BODDIE was paying approximately \$20,000 cash to HARPER and SHERROD each month.

6. It was further part of the scheme that sometime in about 2001, at defendant GLORIA HARPER's request, defendant BARRETT WHITE began acting as an intermediary between defendant TOMMIE BODDIE and defendants HARPER and SHERROD. BODDIE provided money to WHITE, who in turn provided the money to HARPER while keeping a portion of the money for himself. HARPER in turn shared with SHERROD the money WHITE gave to her.

7. It was further part of the scheme that in order to accomplish his role as intermediary, defendant BARRETT WHITE established a company called D'Amoto Transportation ("D'Amoto"). Defendant TOMMIE BODDIE issued checks from T&M to D'Amoto, and WHITE deposited or

cashied those checks. WHITE then used the proceeds of those checks to provide cash to HARPER and SHERROD. D'Amoto did no work for T&M; it served as a means to funnel money from BODDIE to HARPER and SHERROD.

8. It was further part of the scheme that sometime in 2002 or 2003, defendant BARRETT WHITE established a company called "BWT Transportation" ("BWT") to replace D'Amoto as the company through which he would receive payments from T&M and funnel them to defendants GLORIA HARPER and ALICE SHERROD. Defendant TOMMIE BODDIE wrote checks from T&M to BWT, and WHITE deposited the checks into his BWT bank account. WHITE then either wrote checks from the BWT account to himself or to "cash," or he transferred money from the BWT account to another of his accounts before writing a check to himself or to "cash," or he withdrew money from one of his several accounts. After converting the checks from T&M to cash through one of these methods, WHITE provided cash to HARPER and kept some of the cash himself.

9. It was further part of the scheme that in approximately November 2002, at defendant GLORIA HARPER's direction, defendant BARRETT WHITE met defendant ALICE SHERROD at a car dealership in Evanston, Illinois, and provided a \$15,000 cashier's check, which SHERROD used to buy a Lexus that day.

10. It was further part of the scheme that in or about March 2004, defendant BARRETT WHITE, at defendant GLORIA HARPER's direction, wrote a check from the account of one of his businesses in the amount of \$18,228.56 and sent it to a car dealership in Virginia Beach, Virginia, for the purchase of a Toyota Corolla for one of HARPER's relatives. The car was titled in the name of WHITE's business, but it was provided to one of HARPER's relatives for the relative's use.

11. It was further part of the scheme that sometime in or before May 2003, defendant GLORIA HARPER suggested to defendants TOMMIE BODDIE and DERRICK EUBANKS, who operated different transportation companies, that they join together to form one company that would bid on a contract to provide transportation services to NCSD. Both HARPER and defendant ALICE SHERROD told BODDIE and EUBANKS that if they won the contract they would have to split the profits with HARPER and SHERROD. BODDIE and EUBANKS agreed to submit a bid as one company and to split with HARPER and SHERROD the profits, if awarded the contract. As a result of HARPER's suggestion, BODDIE and EUBANKS created Safety First Transportation, Inc. ("Safety First").

12. It was further part of the scheme that on or about May 28, 2003, defendants TOMMIE BODDIE and DERRICK EUBANKS submitted a bid to NCSD in the name of Safety First for contracts for transportation services. On or about June 9, 2003, the NCSD Board awarded Safety First the contracts for transportation services, and on or about August 28, 2003, Safety First signed the transportation contracts with NCSD.

13. It was further part of the scheme that once Safety First began to receive checks from NCSD pursuant to the NCSD transportation contracts, a representative of Safety First deposited checks into various of Safety First's bank accounts. Defendant BARRETT WHITE then converted the funds into cash. WHITE provided the bulk of the cash to defendant GLORIA HARPER for her to share with defendant ALICE SHERROD, and kept a portion of the proceeds for himself. BWT and BARRETT WHITE did no work for Safety First; their sole role was to funnel cash to HARPER and SHERROD.

14. It was further part of the scheme that as a result of an audit of Safety First, TOMMIE

BODDIE, DERRICK EUBANKS and BARRETT WHITE conducted by the Internal Revenue Service (“IRS”) in approximately 2006-2007, Safety First began providing funds to defendant BARRETT WHITE as a Form W-2 wage earner – in addition to funds provided to him and his companies as a Form 1099 contractor – in about late 2006, even though WHITE still provided no service to Safety First other than providing money to defendants GLORIA HARPER and ALICE SHERROD. As a further result of the IRS audit, HARPER agreed that WHITE’s portion of the proceeds should be increased to compensate him for the tax debt WHITE owed the IRS. As a further result of the IRS audit, HARPER, SHERROD, WHITE, and defendants TOMMIE BODDIE and DERRICK EUBANKS, agreed that an amount of Safety First’s revenues from NCSD would be excluded from the profits to be split with HARPER and SHERROD and instead would be used to repay the tax debts owed by BODDIE, EUBANKS, and WHITE.

15. It was further part of the scheme that defendants TOMMIE BODDIE and DERRICK EUBANKS submitted false tax returns for Safety First in which they claimed that they paid defendant BARRETT WHITE hundreds of thousands of dollars in consulting fees and wages for assisting them in obtaining the transportation contract with NCSD, when in fact the money they paid to WHITE was solely for the purpose of paying defendants GLORIA HARPER and ALICE SHERROD for their role in helping them to win and maintain the NCSD transportation contracts. BODDIE and EUBANKS also falsely represented to the IRS auditor who audited Safety First that the money paid to WHITE was for legitimate consulting services.

16. It was further part of the scheme that in or about April 2008, defendants GLORIA HARPER, ALICE SHERROD, TOMMIE BODDIE, DERRICK EUBANKS and BARRETT WHITE agreed to set up a new company to replace Safety First and to assume Safety First’s contract

with NCSD. On or about April 4, 2008, Quality Trans, LLC (“Quality Trans”) was registered as a limited liability company with BODDIE and WHITE as its managers, and it assumed Safety First’s contracts with NCSD. EUBANKS had no formal ownership interest in Quality Trans, but he established his own company called “Expert Consulting” to perform work for Quality Trans in connection with Quality Trans’ contracts with NCSD. HARPER, SHERROD, BODDIE, EUBANKS, and WHITE agreed to split among them Quality Trans’ profits five ways. BODDIE, EUBANKS, and WHITE continued to make cash payments to HARPER and SHERROD.

17. It was further part of the scheme that on or about February 27, 2009, Quality Trans submitted to NCSD a bid for a five-year contract for transportation services. In connection with Quality Trans’ bid, defendants GLORIA HARPER and ALICE SHERROD met with defendant TOMMIE BODDIE to discuss the bid.

18. It was further part of the scheme that following the June 2, 2009 award of the contract to Quality Trans, defendants TOMMIE BODDIE, DERRICK EUBANKS, and BARRETT WHITE continued to make cash payments to defendants GLORIA HARPER and ALICE SHERROD.

19. It was further part of the scheme that as late as from June 2010 through August 2010, defendants GLORIA HARPER and ALICE SHERROD continued to solicit and accept payments from defendants TOMMIE BODDIE, DERRICK EUBANKS, and BARRETT WHITE in return for HARPER’s and SHERROD’s assistance in maintaining Quality Trans’ contract with NCSD for transportation services.

20. As a result of the fraudulent acts of defendants GLORIA HARPER, ALICE SHERROD, TOMMIE BODDIE, DERRICK EUBANKS, and BARRETT WHITE, and others, the NCSD issued payments to companies controlled by BODDIE, EUBANKS and WHITE in a total

amount of at least \$21,000,000. Pursuant to this scheme, HARPER and SHERROD received payments from BODDIE, EUBANKS, and WHITE, that totaled at least about \$800,000.

21. It was further part of the scheme that defendants GLORIA HARPER, ALICE SHERROD, TOMMIE BODDIE, DERRICK EUBANKS, and BARRETT WHITE, and others misrepresented, concealed, and hid, and caused to be misrepresented, concealed and hidden the true purpose of acts done in furtherance of the scheme.

22. On or about March 13, 2009, at North Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

GLORIA HARPER,  
ALICE SHERROD,  
DERRICK EUBANKS,  
TOMMIE BODDIE,  
and BARRETT WHITE,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, knowingly caused to be transmitted by means of a wire communication in interstate commerce from North Chicago, Illinois, through an AOL server in Virginia, and to Waukegan, Illinois, via certain signs, signals and sounds, namely, an electronic mail from Individual A to a representative of Company A;

In violation of Title 18, United States Code, Sections 1343, 1346 and 2.

**COUNT TWO**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations of paragraphs 1-21 of Count One of this indictment are realleged as if restated herein.

2. On or about February 22, 2008, in the Northern District of Illinois, and elsewhere,

GLORIA HARPER,  
ALICE SHERROD,  
DERRICK EUBANKS,  
TOMMIE BODDIE,  
and BARRETT WHITE,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, knowingly caused to be transmitted in interstate commerce from New York, New York, to Tampa, Florida, by means of wire communications, certain signs, signals and sounds, namely, an electronic transmission of instructions relating to a payment from Safety First to BARRETT WHITE in the amount of \$41,457.31, credited to BARRETT WHITE's account at JP Morgan Chase;

In violation of Title 18, United States Code, Sections 1343, 1346 and 2.

**COUNT THREE**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations of paragraphs 1-21 of Count One of this indictment are realleged as if restated herein.

2. On or about March 24, 2008, in the Northern District of Illinois, and elsewhere,

GLORIA HARPER,  
ALICE SHERROD,  
DERRICK EUBANKS,  
TOMMIE BODDIE,  
and BARRETT WHITE,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, knowingly caused to be transmitted in interstate commerce from New York, New York, to Tampa, Florida, by means of wire communications, certain signs, signals and sounds, namely, an electronic transmission of instructions relating to a payment from Safety First to BARRETT WHITE in the amount of \$39,994.31 credited to BARRETT WHITE's account at JP Morgan Chase;

In violation of Title 18, United States Code, Sections 1343, 1346 and 2.

**COUNT FOUR**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations of paragraphs 1-21 of Count One of this indictment are realleged as if restated herein.

2. On or about April 21, 2008, in the Northern District of Illinois, and elsewhere,

GLORIA HARPER,  
ALICE SHERROD,  
DERRICK EUBANKS,  
TOMMIE BODDIE,  
and BARRETT WHITE,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, knowingly caused to be transmitted in interstate commerce from New York, New York, to Tampa, Florida, by means of wire communications, certain signs, signals and sounds, namely, an electronic transmission of instructions relating to a payment from Safety First to BARRETT WHITE in the amount of \$37,572.31, credited to BARRETT WHITE's account at JP Morgan Chase;

In violation of Title 18, United States Code, Sections 1343, 1346, and 2.

**COUNT FIVE**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations of paragraphs 1-21 of Count One of this indictment are realleged as if restated herein.

2. On or about March 20, 2009, in the Northern District of Illinois, and elsewhere,

GLORIA HARPER,  
ALICE SHERROD,  
DERRICK EUBANKS,  
TOMMIE BODDIE,  
and BARRETT WHITE,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, knowingly caused to be transmitted in interstate commerce from Minneapolis, Minnesota, to Winston-Salem, North Carolina, by means of wire communications, certain signs, signals and sounds, namely, an electronic transmission of instructions relating to a payment from Quality Trans to BARRETT WHITE in the amount of \$17,100, credited to BARRETT WHITE's account at JP Morgan Chase;

In violation of Title 18, United States Code, Sections 1343, 1346, and 2.

**COUNT SIX**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations of paragraphs 1-21 of Count One of this indictment are realleged as if restated herein.
2. On or about October 16, 2009, at North Chicago, in the Northern District of Illinois, and elsewhere,

GLORIA HARPER,  
ALICE SHERROD,  
DERRICK EUBANKS,  
TOMMIE BODDIE,  
and BARRETT WHITE,

defendants herein, for the purpose of executing and attempting to execute the above-described scheme, knowingly caused to be transmitted in interstate commerce from Minneapolis, Minnesota, to Winston-Salem, North Carolina, by means of wire communications, certain signs, signals and sounds, namely, an electronic transmission of instructions relating to a payment from Quality Trans to BARRETT WHITE in the amount of \$8,000, credited to BARRETT WHITE's account at JP Morgan Chase;

In violation of Title 18, United States Code, Sections 1343, 1346, and 2.

**COUNT SEVEN**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.
  
2. From approximately July 2006 through June 2007, in the Northern District of Illinois, Eastern Division, and elsewhere,

GLORIA HARPER  
and ALICE SHERROD,

defendants herein, being agents of the NCSD, corruptly solicited and demanded and accepted and agreed to accept things of value from Tommie Boddie, Derrick Eubanks, and Barrett White, namely cash, intending to be influenced and rewarded in connection with a business, transaction and series of transactions of the NCSD involving a thing of value of \$5,000 or more, that is, transportation contracts with the NCSD, NCSD being a government agency that received in excess of \$10,000 in federal funding in a twelve-month period from July 1, 2006 through June 30, 2007;

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

## COUNT EIGHT

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.
2. From approximately July 2006 through June 2007, in the Northern District of Illinois, Eastern Division, and elsewhere,

TOMMIE BODDIE,  
DERRICK EUBANKS,  
and BARRETT WHITE,

defendants herein, did corruptly give, offer and agree to give things of value, namely cash, to Gloria Harper and Alice Sherrod, with the intent to influence and reward Harper and Sherrod in their capacities as agents of the NCSD, in connection with business and transactions, valued at \$5,000 or more, of the NCSD, namely, transportation contracts with the NCSD, NCSD being a government agency that received in excess of \$10,000 in federal funding in a twelve-month period from July 1, 2006 through June 30, 2007;

In violation of Title 18, United States Code, Sections 666(a)(2) and 2.

**COUNT NINE**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.
2. From approximately July 2007 through June 2008, in the Northern District of Illinois, Eastern Division, and elsewhere,

GLORIA HARPER  
and ALICE SHERROD,

defendants herein, being agents of the NCSD, corruptly solicited and demanded and accepted and agreed to accept things of value from Tommie Boddie, Derrick Eubanks, and Barrett White, namely cash, intending to be influenced and rewarded in connection with a business, transaction and series of transactions of the NCSD involving a thing of value of \$5,000 or more, that is, transportation contracts with the NCSD, NCSD being a government agency that received in excess of \$10,000 in federal funding in a twelve-month period from July 1, 2007 through June 30, 2008;

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

**COUNT TEN**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.
2. From approximately July 2007 through June 2008, in the Northern District of Illinois, Eastern Division, and elsewhere,

TOMMIE BODDIE,  
DERRICK EUBANKS,  
and BARRETT WHITE,

defendants herein, did corruptly give, offer and agree to give things of value, namely cash, to Gloria Harper and Alice Sherrod, with the intent to influence and reward Harper and Sherrod in their capacities as agents of the NCSD, in connection with business and transactions, valued at \$5,000 or more, of the NCSD, namely, transportation contracts with the NCSD, NCSD being a government agency that received in excess of \$10,000 in federal funding in a twelve-month period from July 1, 2007 through June 30, 2008;

In violation of Title 18, United States Code, Sections 666(a)(2) and 2.

**COUNT ELEVEN**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.
  
2. From approximately July 2008 through June 2009, in the Northern District of Illinois, Eastern Division, and elsewhere,

GLORIA HARPER  
and ALICE SHERROD,

defendants herein, being agents of the NCSD, corruptly solicited and demanded and accepted and agreed to accept things of value from Tommie Boddie, Derrick Eubanks, and Barrett White, namely cash, intending to be influenced and rewarded in connection with a business, transaction and series of transactions of the NCSD involving a thing of value of \$5,000 or more, that is, transportation contracts with the NCSD, NCSD being a government agency that received in excess of \$10,000 in federal funding in a twelve-month period from July 1, 2008 through June 30, 2009;

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

**COUNT TWELVE**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.
2. From approximately July 2008 through June 2009, in the Northern District of Illinois, Eastern Division, and elsewhere,

TOMMIE BODDIE,  
DERRICK EUBANKS,  
and BARRETT WHITE,

defendants herein, did corruptly give, offer and agree to give things of value, namely cash, to Gloria Harper and Alice Sherrod, with the intent to influence and reward Harper and Sherrod in their capacities as agents of the NCSD, in connection with business and transactions, valued at \$5,000 or more, of the NCSD, namely, transportation contracts with the NCSD, NCSD being a government agency that received in excess of \$10,000 in federal funding in a twelve-month period from July 1, 2008 through June 30, 2009;

In violation of Title 18, United States Code, Sections 666(a)(2) and 2.

**COUNT THIRTEEN**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.
2. From approximately July 2009 through June 2010, in the Northern District of Illinois, Eastern Division, and elsewhere,

GLORIA HARPER  
and ALICE SHERROD,

defendants herein, being agents of the NCSD, corruptly solicited and demanded and accepted and agreed to accept things of value from Tommie Boddie, Derrick Eubanks, and Barrett White, namely cash, intending to be influenced and rewarded in connection with a business, transaction and series of transactions of the NCSD involving a thing of value of \$5,000 or more, that is, transportation contracts with the NCSD, NCSD being a government agency that received in excess of \$10,000 in federal funding in a twelve-month period from July 1, 2009 through June 30, 2010;

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

**COUNT FOURTEEN**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.
2. From approximately July 2009 through June 2010, in the Northern District of Illinois, Eastern Division, and elsewhere,

TOMMIE BODDIE,  
DERRICK EUBANKS,  
and BARRETT WHITE,

defendants herein, did corruptly give, offer and agree to give things of value, namely cash, to Gloria Harper and Alice Sherrod, with the intent to influence and reward Harper and Sherrod in their capacities as agents of the NCSD, in connection with business and transactions, valued at \$5,000 or more, of the NCSD, namely, transportation contracts with the NCSD, NCSD being a government agency that received in excess of \$10,000 in federal funding in a twelve-month period from July 1, 2009 through June 30, 2010;

In violation of Title 18, United States Code, Sections 666(a)(2) and 2.

**COUNT FIFTEEN**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.
  
2. From approximately July 2010 through August 2010, in the Northern District of Illinois, Eastern Division, and elsewhere,

GLORIA HARPER  
and ALICE SHERROD,

defendants herein, being agents of the NCSD, corruptly solicited and demanded and accepted and agreed to accept things of value from Tommie Boddie, Derrick Eubanks, and Barrett White, namely cash, intending to be influenced and rewarded in connection with a business, transaction and series of transactions of the NCSD involving a thing of value of \$5,000 or more, that is, transportation contracts with the NCSD, NCSD being a government agency that received in excess of \$10,000 in federal funding in a twelve-month period from September 1, 2009 through August 31, 2010;

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

**COUNT SIXTEEN**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.

2. On or about May 18, 2005, in the Northern District of Illinois, Eastern Division,

GLORIA HARPER,

defendant herein, willfully made, subscribed, and caused to be made and subscribed, a United States Individual Income Tax Return (Form 1040 with schedules and attachments), for the calendar year 2004, which return was verified by written declaration that it was made under the penalties of perjury and was filed electronically with the Internal Revenue Service with an appropriate electronic signature method, which income tax return she did not believe to be true and correct as to every material matter, in that it stated on Line 22 that hers and her husband's total income was \$436,152, whereas, in truth and fact, as HARPER well knew, their total income was in excess of that amount, in that the defendant failed to report additional gross income received in calendar year 2004, including gross income received from Tommie Boddie, Derrick Eubanks, and Barrett White;

In violation of Title 26, United States Code, Section 7206(1).

## COUNT SEVENTEEN

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.

2. On or about October 13, 2006, in the Northern District of Illinois, Eastern Division,

GLORIA HARPER,

defendant herein, willfully made, subscribed, and caused to be made and subscribed, a United States Individual Income Tax Return (Form 1040 with schedules and attachments), for the calendar year 2005, which return was verified by written declaration that it was made under the penalties of perjury and was filed electronically with the Internal Revenue Service with an appropriate electronic signature method, which income tax return she did not believe to be true and correct as to every material matter, in that it stated on Line 22 that hers and her husband's total income was \$170,027, whereas, in truth and fact, as HARPER well knew, their total income was in excess of that amount, in that the defendant failed to report additional gross income received in calendar year 2005, including gross income received from Tommie Boddie, Derrick Eubanks, and Barrett White;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT EIGHTEEN**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.

2. On or about June 23, 2008, in the Northern District of Illinois, Eastern Division,

GLORIA HARPER,

defendant herein, willfully made, subscribed, and caused to be made and subscribed, a United States Individual Income Tax Return (Form 1040 with schedules and attachments), for the calendar year 2006, which return was verified by written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which income tax return she did not believe to be true and correct as to every material matter, in that it stated on Line 22 that hers and her husband's total income was \$63,633, whereas, in truth and fact, as HARPER well knew, their total income was in excess of that amount, in that the defendant failed to report additional gross income received in calendar year 2006, including gross income received from Tommie Boddie, Derrick Eubanks, and Barrett White;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT NINETEEN**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.

2. On or about June 30, 2009, in the Northern District of Illinois, Eastern Division,

GLORIA HARPER,

defendant herein, willfully made, subscribed, and caused to be made and subscribed, a United States Individual Income Tax Return (Form 1040 with schedules and attachments), for the calendar year 2007, which return was verified by written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which income tax return she did not believe to be true and correct as to every material matter, in that it stated on Line 22 that hers and her husband's total income was \$23,428, whereas, in truth and fact, as HARPER well knew, their total income was in excess of that amount, in that the defendant failed to report additional gross income received in calendar year 2007, including gross income received from Tommie Boddie, Derrick Eubanks, and Barrett White;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT TWENTY**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.

2. On or about March 20, 2006, in the Northern District of Illinois, Eastern Division,

ALICE SHERROD,

defendant herein, willfully made, subscribed, and caused to be made and subscribed, a United States Individual Income Tax Return (Form 1040 with schedules and attachments), for the calendar year 2005, which return was verified by written declaration that it was made under the penalties of perjury and was filed electronically with the Internal Revenue Service with an appropriate electronic signature method, which income tax return she did not believe to be true and correct as to every material matter, in that it stated on Line 22 that her total income was \$94,819, whereas, in truth and fact, as SHERROD well knew, her total income was in excess of that amount, in that the defendant failed to report additional gross income received in calendar year 2005, including gross income received from Gloria Harper, Tommie Boddie, Derrick Eubanks, and Barrett White;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT TWENTY-ONE**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.

2. On or about March 26, 2007, in the Northern District of Illinois, Eastern Division,

ALICE SHERROD,

defendant herein, willfully made, subscribed, and caused to be made and subscribed, a United States Individual Income Tax Return (Form 1040 with schedules and attachments), for the calendar year 2006, which return was verified by written declaration that it was made under the penalties of perjury and was filed electronically with the Internal Revenue Service with an appropriate electronic signature method, which income tax return she did not believe to be true and correct as to every material matter, in that it stated on Line 22 that her total income was \$97,116, whereas, in truth and fact, as SHERROD well knew, her total income was in excess of that amount, in that the defendant failed to report additional gross income received in calendar year 2006, including gross income received from Gloria Harper, Tommie Boddie, Derrick Eubanks, and Barrett White;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT TWENTY-TWO**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.

2. On or about March 31, 2008, in the Northern District of Illinois, Eastern Division,

ALICE SHERROD,

defendant herein, willfully made, subscribed, and caused to be made and subscribed, a United States Individual Income Tax Return (Form 1040 with schedules and attachments), for the calendar year 2007, which return was verified by written declaration that it was made under the penalties of perjury and was filed electronically with the Internal Revenue Service with an appropriate electronic signature method, which income tax return she did not believe to be true and correct as to every material matter, in that it stated on Line 22 that her total income was \$88,227, whereas, in truth and fact, as SHERROD well knew, her total income was in excess of that amount, in that the defendant failed to report additional gross income received in calendar year 2007, including gross income received from Gloria Harper, Tommie Boddie, Derrick Eubanks, and Barrett White;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT TWENTY-THREE**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.

2. On or about March 9, 2009, in the Northern District of Illinois, Eastern Division,

ALICE SHERROD,

defendant herein, willfully made, subscribed, and caused to be made and subscribed, a United States Individual Income Tax Return (Form 1040 with schedules and attachments), for the calendar year 2008, which return was verified by written declaration that it was made under the penalties of perjury and was filed electronically with the Internal Revenue Service with an appropriate electronic signature method, which income tax return she did not believe to be true and correct as to every material matter, in that it stated on Line 22 that her total income was \$91,966, whereas, in truth and fact, as SHERROD well knew, her total income was in excess of that amount, in that the defendant failed to report additional gross income received in calendar year 2008, including gross income received from Gloria Harper, Tommie Boddie, Derrick Eubanks, and Barrett White;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT TWENTY-FOUR**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.

2. At times material to this count:

a. Safety First was a corporation registered in Illinois. Safety First was required to annually file with the IRS a United States Corporation Income Tax Return (Form 1120 with schedules and attachments).

b. TOMMIE BODDIE and DERRICK EUBANKS were each 50 percent shareholders in Safety First.

3. On or about November 19, 2007, in the Northern District of Illinois, Eastern Division,

TOMMIE BODDIE  
and DERRICK EUBANKS,

defendants herein, willfully made, subscribed, and caused to be made and subscribed, a United States Corporation Income Tax Return (Form 1120 with schedules and attachments) for Safety First, for the calendar year 2005, which return was verified by written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which income tax return they did not believe to be true and correct as to every material matter, in that it stated on Line 26 that Safety First's other deductions were \$761,878, whereas, in truth and fact, as BODDIE and EUBANKS well knew, its other deductions were less than that amount, in that defendants included among its other deductions payments to Barrett White and his companies in 2005 that were not legitimate business expenses but were instead illegal kickback payments to White, Gloria Harper and Alice Sherrod;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT TWENTY-FIVE**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.

2. At times material to this count:

a. Safety First was an S corporation registered in Illinois. Safety First was required to annually file with the IRS a United States Corporation Income Tax Return (Form 1120S with schedules and attachments).

b. TOMMIE BODDIE and DERRICK EUBANKS were each 50 percent shareholders in Safety First.

3. On or about September 17, 2007, in the Northern District of Illinois, Eastern Division,

TOMMIE BODDIE  
and DERRICK EUBANKS,

defendants herein, willfully made, subscribed, and caused to be made and subscribed, a United States Income Tax Return for an S Corporation (Form 1120S with schedules and attachments) for Safety First, for the calendar year 2006, which return was verified by written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which income tax return they did not believe to be true and correct as to every material matter, in that it stated on said return that:

(1) On Line 3 of Schedule A the return stated that Safety First's cost of labor was \$773,792, whereas, in truth and fact, as BODDIE and EUBANKS well knew, its cost of labor was less than that amount, in that the defendants included among its cost of labor amounts paid to Barrett

White that were not legitimate wages but were instead illegal kickback payments to White, Gloria Harper and Alice Sherrod; and

(2) On Line 19 it stated that Safety First's other deductions totaled \$689,644, whereas, in truth and fact, as BODDIE and EUBANKS well knew, its other deductions were less than that amount, in that defendants included among its other deductions payments to Barrett White and his companies in 2006 that were not legitimate business expenses but were instead illegal kickback payments to White, Gloria Harper and Alice Sherrod;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT TWENTY-SIX**

The SPECIAL MARCH 2010 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are realleged as if restated herein.

2. At times material to this count:

a. Safety First was an S corporation registered in Illinois. Safety First was required to annually file with the IRS a United States Corporation Income Tax Return (Form 1120S with schedules and attachments).

b. TOMMIE BODDIE and DERRICK EUBANKS were each 50 percent shareholders in Safety First.

3. On or about July 14, 2008, in the Northern District of Illinois, Eastern Division,

TOMMIE BODDIE  
and DERRICK EUBANKS,

defendants herein, willfully made, subscribed, and caused to be made and subscribed, a United States Income Tax Return for an S Corporation (Form 1120S with schedules and attachments) for Safety First, for the calendar year 2007, which return was verified by written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which income tax return they did not believe to be true and correct as to every material matter, in that it stated on said return that:

(1) On Line 8 the return stated that Safety First's salaries and wages were \$653,224, whereas, in truth and fact, as BODDIE and EUBANKS well knew, its salaries and wages were less than that amount, in that defendants included among its salaries and wages payments to Barrett

White in 2007 that were not legitimate salaries and wages but were instead illegal kickback payments to White, Gloria Harper and Alice Sherrod; and

(2) On Line 19 the return stated that Safety First's other deductions were \$502,691, whereas, in truth and fact, as BODDIE and EUBANKS well knew, its other deductions were less than that amount, in that defendants included among its other deductions payments to Barrett White and his companies in 2007 that were not legitimate business expenses but were instead illegal kickback payments to White, Gloria Harper and Alice Sherrod;

In violation of Title 26, United States Code, Section 7206(1).

## FORFEITURE ALLEGATIONS

The SPECIAL MARCH 2010 GRAND JURY further alleges:

1. The allegations contained in Counts One through Fifteen of this Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. As a result of their violations of Title 18, United States Code, Sections 1343, 1346, and 666, as alleged in the foregoing Indictment,

GLORIA HARPER,  
ALICE SHERROD,  
DERRICK EUBANKS,  
TOMMIE BODDIE,  
and BARRETT WHITE,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section, 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all right, title and interest defendants may have in any property, real and personal, which constitutes and is derived from proceeds traceable to the charged offenses.

4. The interests of the defendants subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) include but are not limited to the following:

a. \$9,671,482.80

b. Buses and vans

<b>YEAR, MAKE, MODEL</b>	<b>VEHICLE NUMBER</b>
1988 MCI Hawkeye	1TUCH6A7JR006746
1990 Chevrolet Pickup	1GCGK24K8LE136917
1991 Chevrolet Bus	1GBJ6P1P3MV101019
1993 GMC Bus	1GBJ7T1P5PJ100892
1993 GMC Bus	1GDG7T1POPJ517466
1994 International Bus	1HVBAZRP6RH592426
1995 GMC Bus	1GDHG31K45F508113
1995 GMC Bus	1GDHG31Y2TF503370
1995 Navistar Bus	1HVBBABP8SH265427
1995 Navistar Bus	1HVBBABPXSH265428
1996 Chevrolet Bluebird	1GBHG31K8TF107660
1996 Ford Aerotech	1FDLE40F7THA82479
1997 Bluebird Bus	1BAAKCSA9VF070360
1997 Mercury Villager	4M2DV11166VDJ05653
1997 Oldsmobile Van	1GHDU06E6VD163609
1997 Thomas Bus	4CDT7AM2XS2700835
1998 Bluebird Bus	1BAAKCSHOWF082282
1998 Bluebird Bus	1BAAKCSHOWF082281
1998 Chevrolet	1GBHG31R2W1088599
1998 Chevrolet Bus	1GDHG31F2W1076479
1998 Chevrolet Van	1GNDX03EXWD299249
1998 Ford Van	2FMZA51U4WBC70922
1998 International Bus	1HVBBABP6WH634954
1999 Bluebird Bus	1BAAKCSH4XF088345
1999 Dodge C/Van	2B4GP24G4XR159744
1999 Dodge Van	1B4GP44G1XB602085
1999 GMC	1GDL7T1COWJ514089
1999 International	1HVBBABP0XH237175
1999 International	1HVBBABP6XH202091
Amtran	
1999 International	1HVBBABP1XH202094
Amtran	
1999 Pontiac Van	1GMDU06E0XD176361
1999 Pontiac Van	1GMDX03E8XD315837
2000 Bluebird Bus	1GDL7T1C5YJ514835

2000 Dodge Van	2B4GP2537YR852062
2000 GMC Bluebird	1GD67T1C2XJ515102
2000 GMC Bluebird	1GDL7T1C1XJ518203
2000 GMC Corbeil/Bus	1GDJG31F1Y1202920
2000 GMC Corbeil/Bus	1GDJG31F6Y1202833
2000 International	1HVBBAAP9YH302754
Amtran	
2001 Chevrolet Van	1GNDXD3E01D128325
2001 Dodge Grand	2B8GP44G61R116489
Caravan	
2002 Chevrolet Venture	1GNDX03E82D159808
2002 Dodge Van	2B4GP44R82R705662
2002 Pontiac Montana	1GMDV23EX2D111428
2006 Chevrolet Uplander	1GN DV33L06D126720
2007 GMC Van	1GDFG15T571141046
2008 GMC Sierra	2GTEK13J381271323
2008 GMC Van	1GDFG154981177896

c. Personal vehicles

YEAR, MAKE, MODEL	VEHICLE NUMBER
2001 Mercedes-Benz	WDBNG70J11A144489
2002 Cadillac Pickup	3GYEK63N42G267483
2005 Chrysler	2C3AA63H65H528753
2006 Bentley	SCBBR53W16C039623
2006 Land Rover	SALSF25416A922531
2009 Toyota	JTDBL40E199018194
2010 Chevrolet Coupe	2G1FB1EVXA9100699

5. If any of the property subject to forfeiture and described above, as a result of any act or omission of the defendants:

- 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 under 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 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY