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TWO FORMER SECRETARY OF STATE ROAD TEST EXAMINERS INDICTED FOR ALLEGEDLY ACCEPTING CASH BRIBES TO GUARANTEE PASSING TEST

CHICAGO — Two former road test examiners for the Illinois Secretary of State were indicted for allegedly accepting cash bribes to pass customers who were unqualified or never took the road test, federal law enforcement officials announced today. The charges stem from an investigation that was unveiled in 2009 when members and associates of an alleged crime ring were accused of selling fraudulent identification documents in Chinatown on the city's near south side. The new defendants allegedly conspired between 2005 and 2007 with several of the defendants charged previously to accept cash bribes in return for guaranteeing that an unspecified number of customers would pass the road test, enabling them to obtain an Illinois driver's license.

One defendant, **Christopher Wardlaw**, 36, was arrested today, while the other defendant, **Alanda Jackson**, 31, both of Chicago, will be ordered to appear for arraignment at a later date in U.S. District Court. Both were road test examiners at the Secretary of State's Chicago South Facility, located at 9901 South Dr. Martin Luther King Dr. They were charged with one count of conspiracy to commit extortion in an indictment that was returned by a federal grand jury last

Thursday and unsealed today following Wardlaw's arrest. Wardlaw was released on his own recognizance after appearing this morning before U.S. Magistrate Judge Jeffery T. Gilbert.

The indictment seeks forfeiture of \$40,000, representing alleged illegal proceeds.

The charges were announced by Patrick J. Fitzgerald, United States Attorney for the Northern District of Illinois; Robert D. Grant, Special Agent-in-Charge of the Chicago Office of the FBI; Chicago Police Superintendent Garry F. McCarthy; and Illinois Secretary of State Inspector General James B. Burns. The charges are part of *Operation Paper Mountain*, which has resulted in federal charges against approximately three dozen defendants since 2009.

According to the indictment, Wardlaw and Jackson conspired with another former SOS employee, Timothy Johnson, as well as with Jun Yun Zhang, Lili Liu, Tiansheng Zhang, and others, who were indicted in 2009. Each of those defendants has pleaded guilty to related federal charges. The Zhangs and other defendants routinely escorted customers to Secretary of State driver's license facilities to fraudulently obtain state identification cards or driver's licenses, typically using counterfeit or altered authentic Chinese passports and legitimate social security account numbers with the prefix "586" that were assigned to other people. The 586 prefix is unusual because it is assigned to individuals in the Northern Mariana Islands, including Saipan, Guam and American Samoa.

When co-conspirators accompanied customers to the Chicago South facility, Wardlaw and Jackson allegedly guaranteed passing results on the road test either by serving as the examiner and passing the customer even if he or she failed the road test, or by obtaining the customer's road test paperwork from a co-conspirator and indicating that the customer passed when, in fact, the customer never took the test.

The government is being represented by Assistant U.S. Attorneys Matthew Madden, Steven J. Dollear and Yasmin Best.

Extortion conspiracy carries a maximum penalty of 20 years in prison and a \$250,000 fine. If convicted, the Court must impose a reasonable sentence under federal statutes and the advisory United States Sentencing Guidelines.

The public is reminded that an indictment contains only charges and is not evidence of guilt. The defendants are presumed innocent and are entitled to a fair trial at which the government has the burden of proving guilt beyond a reasonable doubt.

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