

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	<u>UNDER SEAL</u>
)	
)	No.
v.)	
)	Violation: Title 18, United States Code,
CHRISTOPHER WARDLAW and)	Section 1951
ALANDA JACKSON)	

The SPECIAL JULY 2010 GRAND JURY charges:

1. At times material to this indictment:

a. The People's Republic of China ("PRC") was a country that issued passports to certain residents that could then be used to travel outside of the People's Republic of China and these passports included certain identifying information, including the passport holder's photograph, name, date of birth, and a unique PRC passport number.

b. The Illinois Secretary of State's Office ("ISOS") licensed motor vehicle drivers who were thereby authorized to drive motor vehicles within Illinois and from Illinois to other states. The ISOS also issued identification cards to Illinois residents. The drivers licenses and identification cards issued by the ISOS included the picture of the individual issued the driver's license or identification card and listed certain identifying information, such as the individual's name, address and date of birth.

c. Individuals seeking an Illinois driver's license and identification card ("Applicants") from the ISOS were required to provide certain information and documents to the ISOS at one of the ISOS facilities located throughout Illinois. Applicants were

required to provide the Applicant's name, date of birth and social security number ("SSN"), issued by the United States Social Security Administration ("SSA"), to an ISOS employee.

d. Prior to obtaining an Illinois driver's license or identification card, Applicants were also required to show an ISOS employee an identification document with the Applicant's photograph, such as a passport, that confirmed the Applicant's name and date of birth. Applicants were also required to show an ISOS employee the Applicant's SSA card ("SSC") with his or her SSN. Applicants were further required to show the ISOS employee proof of the Applicant's Illinois residency ("Proof of Residency"), which could include a bank statement, a bill, or post-marked envelope listing the Applicant's Illinois address.

e. Applicants seeking an Illinois driver's license ("Driver's License Applicants") were required to pass a written test demonstrating their knowledge of the Illinois traffic laws ("Written Test") and a practical driving skills test, which was administered while driving with an ISOS employee ("Road Test"), prior to being licensed to drive in Illinois and issued a driver's license by the ISOS.

f. The Written Test consisted of a series of multiple choice questions that tested the Applicant's knowledge of Illinois driving laws.

g. Upon obtaining a passing score on the Written Test, the Driver's License Applicant was provided a driver's permit. The Drivers License Applicant was then required to take and pass the Road Test with an ISOS employee, who was trained by the ISOS to evaluate the Driving License Applicant's driving skills ("Road Test Examiner").

h. The Road Test was administered in a vehicle that was provided by the

Driver's License Applicant. Before starting the Road Test, the Road Test examiner performed a safety inspection of the vehicle to be used for the Road Test. If the vehicle passed the safety inspection, the Road Test began. In order to obtain a passing score on the Road Test, a Driver's License Applicant was required to successfully execute a series of driving skills when prompted by the Road Test Examiner and correctly answer certain questions orally presented by the Road Test Examiner. If the Driver's License Applicant passed the Road Test, the Driver's License Applicant was permitted to obtain an Illinois driver's license that same day.

i. The SSA issued SSCs with unique eight digit SSNs to certain authorized individuals in the United States of America or in certain areas that are considered territories of the United States of America. The first three numbers (the "Prefix") in a SSN indicated the geographical location where the SSN was issued to a individual.

j. The Northern Mariana Islands, which included the Island of Saipan and Guam, and America Samoa were territories of the United States in which the SSA issued SSCs and SSNs to individuals seeking to work in those areas. When issued, these SSNs began with the Prefix 586.

k. Individuals traveling to the Northern Mariana Islands and America Samoa from foreign countries, such as PRC and Korea, to obtain employment were issued SSNs by the SSA prior to the start of their employment in the Northern Mariana Islands, Guam, and America Samoa.

l. Defendant Christopher Wardlaw, defendant Alanda Jackson, and

Timothy Johnson were Road Test Examiners at the ISOS facility located at 901 South Dr. Martin Luther King Drive in Chicago, Illinois (“Chicago South Facility”).

2. Beginning no later than in April 2005, and continuing until on or August 2007, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHRISTOPHER WARDLAW and
ALANDA JACKSON,

defendants herein, conspired with each other and with Timothy Johnson, Jun Yun Zhang, Lili Liu, Tiansheng Zhang and others known and unknown to the Grand Jury, to commit extortion, which extortion affected commerce, and which conspiracy consisted, in summary, of an agreement that CHRISTOPHER WARDLAW and ALANDA JACKSON and Timothy Johnson would obtain property, in the form of cash payments, from Jun Yun Zhang, Lili Liu, Tiansheng Zhang and certain Illinois drivers license applicants, for the benefit of Jun Yun Zhang, Lili Liu, Tiansheng Zhang, and the drivers license applicants, with the consent of the Jun Yun Zhang, Lili Liu, Tiansheng Zhang, and Illinois drivers license applicants and induced under color of official right.

3. It was part of the conspiracy that defendants CHRISTOPHER WARDLAW and ALANDA JACKSON, while working at the Chicago South Facility as Road Test Examiners, agreed with Timothy Johnson, Jun Yun Zhang, Lili Liu, Tiansheng Zhang and others that cash payments would be made to CHRISTOPHER WARDLAW, ALANDA JACKSON and others by Jun Yun Zhang, Lili Liu, Tiansheng Zhang and other conspirators. In exchange for the cash payments, defendants CHRISTOPHER WARDLAW, ALANDA

JACKSON and others completed the ISOS Road Test paperwork passing individuals (“Customers”) brought to the Chicago South Facility by Jun Yun Zhang, Lili Liu, Tiansheng Zhang and other conspirators, when in fact these Customers were unqualified to pass the road test or never took the road test.

4. It was further part of the conspiracy that Jun Yun Zhang, Lili Liu, Tiansheng Zhang and other conspirators spoke by telephone or in person to CHRISTOPHER WARDLAW and ALANDA JACKSON and other coconspirators to inform them that Jun Yun Zhang, Lili Liu, Tiansheng Zhang or other conspirators were transporting a Customer that needed assistance with the Road Test. CHRISTOPHER WARDLAW and ALANDA JACKSON guaranteed passing results on the Road Test either by serving as the Road Test examiner for the Customer and passing the Customer even if he or she failed the Road Test, or by obtaining the Customer’s Road Test paperwork from Jun Yun Zhang, Lili Liu, Tiansheng Zhang and other conspirators and completing the paperwork indicating the Customer passed the Road Test, when in fact the Customer never took the Road Test.

5. It was further part of the conspiracy that Jun Yun Zhang, Lili Liu, Tiansheng Zhang and others paid cash bribes to CHRISTOPHER WARDLAW and ALANDA JACKSON inside the vehicle during the Road Test, upon completing the Road Test paperwork for a Customer during the work day or at a later time after CHRISTOPHER WARDLAW and ALANDA JACKSON had completed their work shift.

6. It was further part of the conspiracy that the defendants hid, misrepresented, concealed, and caused to be misrepresented, concealed and hidden, the objective of and acts

done in furtherance of the conspiracy to avoid detection and apprehension by law enforcement authorities.

In violation of Title 18, United States Code, Section 1951.

FORFEITURE ALLEGATION

The SPECIAL JULY 2010 GRAND JURY further charges:

1. The allegations contained in 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 violation of Title 18, United States Code, Section 1951, as alleged in the foregoing Indictment,

CHRISTOPHER WARDLAW and
ALANDA JACKSON,

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 in property, real and personal, which constitutes and is derived from proceeds traceable to the charged offense.

3. 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 approximately \$40,000.

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:

FOREPERSON

UNITED STATES ATTORNEY