

The People of the State of Illinois

VS.

Case#: 2023597

DEFENDANT:

Thomas W. Downing

[REDACTED]
[REDACTED]

BILL OF INDICTMENT

COUNT I: The Grand Jury of McLean County, Illinois, charges that **Thomas W Downing** on or about March 24, 2023, through on or about August 30, 2024, in the city of Bloomington, in the County of McLean, State of Illinois, committed the offense of

VENDOR FRAUD

in that the defendant, through a series of acts performed in furtherance of a single intention and design to obtain property of a single owner, at least one of the acts having occurred after June 10, 2023 and within the statute of limitations, willfully, by means of false statements and representations, submitted false Division of Rehabilitation Services, Home Services time sheets to the Division of Rehabilitation Services to obtain payments under the Public Aid Code to which he was not entitled, and based on said false Home Services time sheets the Division of Rehabilitation Services of the Illinois Department of Human Services authorized payments to Thomas W. Downing, said amount having an aggregate value of more than ten thousand dollars (\$10,000.00), but less than one hundred thousand dollars (\$100,000), in violation of 305 ILCS 5/8A-3(a).

A Class 1 Felony



A TRUE BILL

[REDACTED]
Folgerperson

Additional ID

[REDACTED]

LIST OF WITNESSES:

[REDACTED]

Booking or TMP#:

The People of the State of Illinois

VS.

Case#: 26CF597

DEFENDANT:

Thomas W. Downing

[REDACTED]
[REDACTED]

Report Number / Agency: 25 ILMCU 197, Illinois Medicaid Fraud Control Unit

BILL OF INDICTMENT

COUNT II: The Grand Jury of McLean County, Illinois, charges that **Thomas W Downing** on or about March 24, 2023, through on or about August 30, 2024, in the city of Bloomington, in the County of McLean, State of Illinois, committed the offense of

THEFT

in that the defendant, through a series of acts performed in furtherance of a single intention and design to obtain property of a single owner, at least one of the acts having occurred after June 10, 2023 and within the statute of limitations, knowingly exerted unauthorized control over governmental property of the State of Illinois, said property being United States Currency having a total value exceeding ten thousand dollars (\$10,000.00) and not exceeding on hundred thousand dollars (\$100,000.00), with the intent to permanently deprive the State of Illinois of the use or benefit of said property

in violation of 5/16-1(a)(1)(A)

A Class 1 felony

A TRUE BILL



[REDACTED]

Foreperson

Additional ID

Hgt: [REDACTED]

LIST OF WITNESSES:

[REDACTED]

Booking or TMP#:

Report Number / Agency: 25 ILMCU 197, Illinois Medicaid Fraud Control Unit

STATE OF ILLINOIS
COUNTY OF MCLEAN

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT

The People of the State of Illinois

VS.

Case#: 26CF597

DEFENDANT:

Thomas W. Downing

[REDACTED]
[REDACTED]

BILL OF INDICTMENT

COUNT III: The Grand Jury of McLean County, Illinois, charges that **Thomas W Downing** on or about March 24, 2023, through on or about August 30, 2024, in the city of Bloomington, in the County of McLean, State of Illinois, committed the offense of

THEFT

in that the defendant, through a series of acts performed in furtherance of a single intention and design to obtain property of a single owner, at least one of the acts having occurred after June 10, 2023 and within the statute of limitations, knowingly obtained by deception, control over governmental property of the State of Illinois, said property being United States Currency having a total value exceeding ten thousand dollars (\$10,000.00) and not exceeding on hundred thousand dollars (\$100,000.00), in that the defendant submitted false time sheets to the Illinois Department of Human Services causing the Illinois Department of Human Services to authorize payments to the defendant, with the intent to permanently deprive the State of Illinois of the use or benefit of said property in violation of 5/16-1(a)(2)(A)

A Class 1 felony

A TRUE BILL



[REDACTED]
Foreperson

Additional ID

[REDACTED]

LIST OF WITNESSES:

[REDACTED]

The People of the State of Illinois

VS.

Case#: 26cf597

DEFENDANT:

Thomas W. Downing

[REDACTED]
[REDACTED]

Booking or TMP#:

Report Number / Agency: 25 ILMCU 197, Illinois Medicaid Fraud Control Unit

BILL OF INDICTMENT

COUNT IV: The Grand Jury of McLean County, Illinois, charges that **Thomas W Downing** on or about March 24, 2023, through on or about August 30, 2024, in the city of Bloomington, in the County of McLean, State of Illinois, committed the offense of

FORGERY

in that the defendant, through a series of acts performed in furtherance of a single intention and design, with the intent to defraud, knowingly delivered false documents to the Illinois Department of Human Services, to wit: Home Services Time Sheets containing false entries for times and dates of services that were not rendered, knowing the documents had thus been made in violation of 5/17-3(a)(2)

A Class 1 felony

A TRUE BILL



[REDACTED]

Foreperson

Additional ID

[REDACTED]

LIST OF WITNESSES:

[REDACTED]

Booking or TMP#:

Report Number / Agency: 25 ILMCU 197, Illinois Medicaid Fraud Control Unit