

FILED

23-cr-277

Judge Rowland

Magistrate Judge Weisman

AUG 03 2023

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Aug 3, 2023

UNITED STATES OF AMERICA)

v.)

SHAUNTELE Y. PRIDGEON,
LATASHA THOMAS,
TRACEY JERVIER,
TAHNDREA N. HARPER,
JOI SANDERSON,
KELLI PAYNE,
RONNIE WEBB,
NIKKI GIOVANNI HOUSTON,
SHENITA MCGARY,
SHERRI BAINES,
KIECHA L. LACEY,
CHRISTINA A. DAVIS,
MARRISSA TERRY,
ARAMIS COLLIER, and
AUNSHEREE NELSON)

UNDER SEAL

No. 23 CR 277

Violations: Title 18, United States
Code, Sections 1341, 1343, 1346 and
1957

COUNT ONE

The SPECIAL JANUARY 2023 GRAND JURY charges:

1. At times material to this indictment:

a. The Illinois Department of Children and Family Services (“DCFS”) was a cabinet level agency of the government of the State of Illinois and had offices in Chicago, Illinois and elsewhere. The mission statement of DCFS was to “protect children who are reported to be abused or neglected and to increase their families’ capacity to safely care for them; to provide for the well-being of children in the care of DCFS; provide appropriate, permanent families as quickly as possible for those children who cannot safely return home; support early intervention and child

abuse prevention activities and work in partnerships with communities to fulfill this mission.” DCFS’s responsibilities included payment to childcare providers who provided services to children under the supervision of DCFS.

b. Defendant SHAUNTELE Y. PRIDGEON was a resident of Chicago, Illinois, and was employed as a Community Social Service Planner in DCFS’s Chicago Offices. PRIDGEON’s employment duties at DCFS included approving suitable childcare providers for foster children and other children under the supervision of DCFS, as well as causing the State of Illinois to disburse funds to compensate approved childcare providers for the childcare services they rendered for foster children and other children under the supervision of DCFS.

c. As part of her employment with DCFS, PRIDGEON was prohibited from receiving bribes, gifts or anything of value from any individuals or entities that did business with or sought to do business with the State of Illinois or DCFS, including the childcare service providers who received payment for providing childcare services to foster children and other children under the supervision of DCFS.

d. PRIDGEON controlled a bank account at Financial Institution A that was held in the name of M&S Enterprises.

e. Defendant LATASHA THOMAS received more than \$1.6 million from the State of Illinois as payment for childcare services purportedly rendered for foster children and other children under the supervision of DCFS.

f. Defendant TRACEY JERVIER received more than \$695,000 from the State of Illinois as payment for childcare services purportedly rendered for foster children and other children under the supervision of DCFS.

g. Defendant TAHNDREA N. HARPER received nearly \$500,000 from the State of Illinois as payment for childcare services purportedly rendered for foster children and other children under the supervision of DCFS.

h. Defendant JOI SANDERSON received more than \$280,000 from the State of Illinois as payment for childcare services purportedly rendered for foster children and other children under the supervision of DCFS.

i. Defendant KELLI PAYNE received more than \$400,000 from the State of Illinois as payment for childcare services purportedly rendered for foster children and other children under the supervision of DCFS.

j. Defendant RONNIE WEBB received more than \$228,000 from the State of Illinois as payment for childcare services purportedly rendered for foster children and other children under the supervision of DCFS.

k. Defendant NIKKI GIOVANNI HOUSTON received more than \$495,000 from the State of Illinois as payment for childcare services purportedly rendered for foster children and other children under the supervision of DCFS.

l. Defendant SHENITA MCGARY received approximately \$449,000 from the State of Illinois as payment for childcare services purportedly rendered for foster children and other children under the supervision of DCFS.

m. Defendant SHERRI BAINES received more than \$263,000 from the State of Illinois as payment for childcare services purportedly rendered for foster children and other children under the supervision of DCFS.

n. Defendant KIECHA L. LACEY received more than \$203,000 from the State of Illinois as payment for childcare services purportedly rendered for foster children and other children under the supervision of DCFS.

o. Defendant CHRISTINA A. DAVIS received more than \$128,000 from the State of Illinois as payment for childcare services purportedly rendered for foster children and other children under the supervision of DCFS.

p. Defendant MARISSA TERRY received more than \$155,000 from the State of Illinois as payment for childcare services purportedly rendered for foster children and other children under the supervision of DCFS.

q. Defendant ARAMIS COLLIER received more than \$75,000 from the State of Illinois as payment for childcare services purportedly rendered for foster children and other children under the supervision of DCFS.

r. Defendant AUNSHEREE NELSON received more than \$65,000 from the State of Illinois as payment for childcare services purportedly rendered for foster children and other children under the supervision of DCFS.

2. Beginning no later than July 2016, and continuing until at least on or about August 16, 2022, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAUNTELE Y. PRIDGEON,
LATASHA THOMAS,
TRACEY JERVIER,
TAHNDREA N. HARPER,
JOI SANDERSON,
KELLI PAYNE,
RONNIE WEBB,
NIKKI GIOVANNI HOUSTON,
SHENITA MCGARY,
SHERRI BAINES,
KIECHA L. LACEY,
CHRISTINA A. DAVIS,
MARRISSA TERRY,
ARAMIS COLLIER, and
AUNSHEREE NELSON,

defendants herein, together with others known and unknown to the Grand Jury, knowingly and with the intent to defraud, devised and participated in a scheme to defraud the State of Illinois of money and property by means of materially false and fraudulent pretenses, representations, and promises, and of the intangible right to the honest services of PRIDGEON through bribery and kickbacks, which scheme is further described below.

3. It was part of the scheme that PRIDGEON, while working as a Community Social Service Planner at DCFS, directed at least approximately \$3.2 million in State of Illinois funds to her co-defendants and others, known and unknown to the Grand Jury, who agreed to receive the funds as payment for purported childcare services for children they knew were not in fact in their care, and

PRIDGEON's co-defendants and others known and unknown to the Grand Jury further agreed to and did pay PRIDGEON bribes and kickbacks totaling approximately \$1.6 million in connection with the funds paid to them for childcare services they did not provide, which PRIDGEON used to pay her personal expenses and otherwise used for gambling at Casino A in Hammond, Indiana.

4. It was further part of the scheme that PRIDGEON submitted and caused to be approved in the DCFS computer system several of her co-defendants and others known and unknown to the Grand Jury as DCFS childcare providers eligible to be paid for foster children and other children under the supervision of DCFS, despite PRIDGEON and her co-defendants knowing that PRIDGEON fraudulently would direct payments to her co-defendants for the purported provision of childcare for children for whom PRIDGEON's co-defendants knew they did not provide any childcare services.

5. It was further part of the scheme that PRIDGEON's co-defendants provided their bank account information or mailing address to DCFS for the purpose of receiving payments from the State of Illinois, either by direct deposit or checks sent by mail, for purported childcare services of children for whom they knew they did not provide childcare services.

6. It was further part of the scheme that PRIDGEON's co-defendants submitted to DCFS each month—and in some cases more frequently—"Billing Certificates" in which they misrepresented that they had provided childcare services

for children for whom they knew they did not provide childcare services and demanded payment for those purported childcare services.

7. It was further part of the scheme that PRIDGEON's co-defendants and others paid bribes and kickbacks to PRIDGEON—either by cash payments, checks, or wire transfers from their bank accounts to PRIDGEON's M&S Enterprises bank account at Financial Institution A—often in amounts totaling approximately 50% of the funds PRIDGEON had previously directed in the form of payment of State of Illinois funds for purported childcare services for children for whom they knew they did not provide childcare services.

8. It was further part of the scheme that the defendants concealed, misrepresented, and hid, and caused to be concealed, misrepresented, and hidden, the existence and purpose of the scheme and the acts done in furtherance of the scheme.

9. On or about June 7, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAUNTELE Y. PRIDGEON and
TAHNDREA N. HARPER,

defendants herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$8,727.84 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by HARPER;

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

COUNT TWO

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.
2. On or about August 7, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

TAHNDREA N. HARPER,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$9,482.22 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by HARPER;

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

COUNT THREE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about September 5, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHERRI BAINES,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$6,364.48 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by BAINES;

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

COUNT FOUR

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about September 11, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

TAHNDREA N. HARPER,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$10,168.40 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by HARPER;

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

COUNT FIVE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about January 3, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIECHA L. LACEY,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be delivered by U.S. mail, according to the direction thereon, an envelope addressed to LACEY in the Northern District of Illinois containing a check from the Illinois State Comptroller in the amount of \$7,721.80;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT SIX

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about January 3, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIECHA L. LACEY,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be delivered by U.S. mail, according to the direction thereon, an envelope addressed to LACEY in the Northern District of Illinois containing a check from the Illinois State Comptroller in the amount of \$11,121.13;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT SEVEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about February 21, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOI SANDERSON,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$6,135.71 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by SANDERSON;

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

COUNT EIGHT

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about February 27, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOI SANDERSON,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$16,573.47 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by SANDERSON;

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

COUNT NINE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.
2. On or about March 16, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOI SANDERSON,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$6,749.00 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by SANDERSON;

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

COUNT TEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about September 15, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHERRI BAINES,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$6,382.95 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by BAINES;

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

COUNT ELEVEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about October 15, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHERRI BAINES,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$6,057.03 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by BAINES;

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

COUNT TWELVE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about October 21, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

AUNSHEREE NELSON,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$1,543.92 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by NELSON;

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

COUNT THIRTEEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about November 25, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHRISTINA A. DAVIS,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$15,405.72 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by DAVIS;

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

COUNT FOURTEEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about November 25, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

MARISSA TERRY,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$9,177.30 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by TERRY;

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

COUNT FIFTEEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about December 10, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

MARISSA TERRY,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$8,343.00 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by TERRY;

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

COUNT SIXTEEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about January 26, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIECHA L. LACEY,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be delivered by U.S. mail, according to the direction thereon, an envelope addressed to LACEY in the Northern District of Illinois containing a check from the Illinois State Comptroller in the amount of \$9,157.50;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT SEVENTEEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about February 23, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

NIKKI GIOVANNI HOUSTON,
defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$8,904.54 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by HOUSTON;

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

COUNT EIGHTEEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about February 23, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHENITA MCGARY,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$7,935.54 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by MCGARY;

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

COUNT NINETEEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.
2. On or about March 15, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

NIKKI GIOVANNI HOUSTON,
defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$10,327.20 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by HOUSTON;

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

COUNT TWENTY

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.
2. On or about April 8, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

KELLI PAYNE,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$11,926.42 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by PAYNE;

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

COUNT TWENTY-ONE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.
2. On or about April 8, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

NIKKI GIOVANNI HOUSTON,
defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$8,213.53 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by HOUSTON;

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

COUNT TWENTY-TWO

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.
2. On or about April 14, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHENITA MCGARY,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$11,683.31 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by MCGARY;

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

COUNT TWENTY-THREE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about April 14, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

AUNSHEREE NELSON,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$4,184.40 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by NELSON;

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

COUNT TWENTY-FOUR

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about May 10, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHENITA MCGARY,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$9,887.46 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by MCGARY;

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

COUNT TWENTY-FIVE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about May 12, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

AUNSHEREE NELSON,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$2,510.64 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by NELSON;

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

COUNT TWENTY-SIX

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about May 13, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

KELLY PAYNE,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$9,476.06 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by PAYNE;

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

COUNT TWENTY-SEVEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about July 14, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

KELLI PAYNE,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$8,832.12 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by PAYNE;

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

COUNT TWENTY-EIGHT

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about August 12, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

RONNIE WEBB,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be delivered by U.S. mail, according to the direction thereon, an envelope addressed to WEBB in the Northern District of Illinois containing a check from the Illinois State Comptroller in the amount of \$8,470.00;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT TWENTY-NINE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.
2. On or about October 5, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

MARISSA TERRY,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be delivered by U.S. mail, according to the direction thereon, an envelope addressed to TERRY in the Northern District of Illinois containing a check from the Illinois State Comptroller in the amount of \$16,601.07;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT THIRTY

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about October 5, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARAMIS COLLIER,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be delivered by U.S. mail, according to the direction thereon, an envelope addressed to COLLIER in the Northern District of Illinois containing a check from the Illinois State Comptroller in the amount of \$22,236.50;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT THIRTY-ONE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about October 27, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARAMIS COLLIER,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be delivered by U.S. mail, according to the direction thereon, an envelope addressed to COLLIER in the Northern District of Illinois containing a check from the Illinois State Comptroller in the amount of \$7,804.09 ;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT THIRTY-TWO

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about November 8, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

TRACEY JERVIER,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$9,637.32 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by JERVIER;

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

COUNT THIRTY-THREE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about December 20, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARAMIS COLLIER,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be delivered by U.S. mail, according to the direction thereon, an envelope addressed to COLLIER in the Northern District of Illinois containing a check from the Illinois State Comptroller in the amount of \$12,976.11;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT THIRTY-FOUR

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about December 21, 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

RONNIE WEBB,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be delivered by U.S. mail, according to the direction thereon, an envelope addressed to WEBB in the Northern District of Illinois containing a check from the Illinois State Comptroller in the amount of \$6,615.00;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT THIRTY-FIVE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about March 25, 2022, in the Northern District of Illinois, Eastern Division, and elsewhere,

RONNIE WEBB,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be delivered by U.S. mail, according to the direction thereon, an envelope addressed to WEBB in the Northern District of Illinois containing a check from the Illinois State Comptroller in the amount of \$2,442.00;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT THIRTY-SIX

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about April 6, 2022, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATASHA THOMAS,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$3,456.36 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by THOMAS;

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

COUNT THIRTY-SEVEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about July 13, 2022, in the Northern District of Illinois, Eastern Division, and elsewhere,

TRACEY JERVIER,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$12,505.26 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by JERVIER;

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

COUNT THIRTY-EIGHT

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 through 8 of Count One of this Indictment are incorporated here.

2. On or about August 15, 2022, in the Northern District of Illinois, Eastern Division, and elsewhere,

TRACEY JERVIER,

defendant herein, for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain writings, signs, and signals, namely, an interstate transfer of funds of approximately \$7,730.20 by the Illinois State Comptroller, using the Federal Reserve's "Fed ACH" system, to a bank account owned and controlled by JERVIER;

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

COUNTS THIRTY-NINE THROUGH FORTY-ONE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

1. Paragraphs 1 and 3 through 8 of Count One of this Indictment are incorporated here.

2. On or about the dates set forth below, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATASHA THOMAS and
RONNIE WEBB,

defendants herein, did knowingly engage and attempt to engage in the following monetary transactions by, through, or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is, the deposit, withdrawal, transfer and exchange of funds and monetary instruments, such property having been derived from a specified unlawful activity, that is, mail fraud, in violation of Title 18, United States Code, Sections 1341 and 2.

<u>COUNT</u>	<u>DATE</u>	<u>MONETARY TRANSACTION</u>
39	November 26, 2019	THOMAS's deposit of a check from the State of Illinois in the amount of \$19,068.35, which check was mailed to WEBB at his residence and made payable to "Webb Feet Child Care Inc."
40	November 30, 2020	THOMAS's deposit of two checks from the State of Illinois totaling \$10,274.00, which checks were mailed to WEBB at his residence and made payable to "Webb Feet Child Care Inc."
41	May 19, 2021	THOMAS's deposit of a check from the State of Illinois in the amount of \$10,164.00, which check was mailed to WEBB at his residence and made payable to "Webb Feet Child Care Inc."

All in violation of Title 18, United States Code, Section 1957.

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2023 GRAND JURY further alleges:

1. The allegations contained in this indictment are incorporated here 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 the violations of Title 18, United States Code, Sections 1341, 1343, 1346, and 1957 as alleged in Counts One through Forty-One of this indictment,

SHAUNTELE Y. PRIDGEON,
LATASHA THOMAS,
TRACEY JERVIER,
TAHNDREA N. HARPER,
JOI SANDERSON,
KELLI PAYNE,
RONNIE WEBB,
NIKKI GIOVANNI HOUSTON,
SHENITA MCGARY,
SHERRI BAINES,
KIECHA L. LACEY,
CHRISTINA A. DAVIS,
MARRISSA TERRY,
ARAMIS COLLIER, and
AUNSHEREE NELSON,

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), all property constituting, and derived from, and traceable to, proceeds obtained, directly or indirectly, as a result of the defendants' violations of Title 18, United States Code, Sections 1341, 1343, 1346, and 1957, including approximately at least \$3.2 million.

3. If any of the forfeitable property described above, as a result of any act or omission by 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 18, United States Code, Section 982(b)(1).

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