

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	No.
)	
v.)	Violations: Title 18, United States
)	Code, 1623(a)
SIVASUBRAMANI RAJARAM)	

INDICTMENT

The SPECIAL AUGUST 2015 GRAND JURY charges:

1. At times material to this Indictment:
 - a. The SPECIAL AUGUST 2015 GRAND JURY was conducting an investigation of possible violations of federal criminal law in connection with the purchasing of jobs and promotions within the Office of the Clerk of the Circuit Court of Cook County.
 - b. Individual A was the Clerk of the Circuit Court of Cook County.
 - c. Individual B was a high-ranking employee of the Office of the Clerk of the Circuit Court of Cook County.
 - d. In August 2014, defendant SIVASUBRAMANI RAJARAM, a former employee of the Office of the Clerk of the Circuit Court of Cook County, returned to Chicago after living in India for several years and purportedly loaned \$15,000 to Goat Masters Corporation, whose President was Individual A's husband.
 - e. On or about September 8, 2014, the Office of the Clerk of the Circuit Court of Cook County rehired defendant SIVASUBRAMANI RAJARAM in the position of Clerk Senior IV.

f. The following matters, among others, were material to the Grand Jury's investigation:

- Whether SIVASUBRAMANI RAJARAM spoke to Individual A after he was rehired by the Office of the Clerk of the Circuit Court of Cook County; and
- Whether SIVASUBRAMANI RAJARAM was in phone contact with Individual B either before or after he was rehired by the Office of the Clerk of the Circuit Court of Cook County.

2. On or about October 1, 2015, at Chicago, in the Northern District of Illinois, Eastern Division,

SIVASUBRAMANI RAJARAM,

defendant herein, was placed under oath before testifying and was advised that his testimony was subject to the penalties of perjury before the SPECIAL AUGUST 2015 GRAND JURY, and knowingly made two false material declarations during his testimony by responding to questions as follows:

Q: How about after you were rehired, did you have occasion to talk with [Individual A]?

A: No. At the meeting, even at the picnic I don't have chance to.

Q: Since you've been rehired, have you talked to [Individual A] at all?

A: No.

Q: So currently in the – since you've moved back to Chicago, how often have you talked to [Individual B]?

A: Maybe like three or four times.

Q: By phone?

A: No. FIA on the day, the 2014 parade, this parade also I met . . .

WHEREAS, in truth and fact, as RAJARAM then knew:

- since the Office of the Clerk of the Circuit Court of Cook County rehired RAJARAM on or about September 8, 2014, RAJARAM spoke with Individual A; and
- since he returned to Chicago in approximately August 2014 and through approximately October 1, 2015, RAJARAM spoke by cell phone to Individual B dozens of times.

In violation of Title 18, United States Code, Section 1623(a).

A TRUE BILL:

FOREPERSON

ZACHARY T. FARDON
United States Attorney