

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
 v.) No.
)
 SHAROD GORDON,) Violations: Title 18, United States
 ANGELIQUE ORR,) Code, Sections 1001,
 KRYSTAL STOKES,) 1343, and 1346
 MARVA SMITH,)
 a/k/a "Marva Hall,")
 TIFFANY MCQUEEN)
 NANCY VAZQUEZ,)
 MARQUITA PAYNE,)
 a/k/a "Marquita Cunningham," and)
 TIFFANY CAPEL)

COUNT ONE

The SPECIAL JUNE 2018 GRAND JURY charges:

1. At times material to this indictment:

Relevant Entities and Individuals

a. Community College District No. 508, which was commonly referred to as City Colleges of Chicago, was a system of seven community colleges within the city of Chicago.

b. City Colleges of Chicago contracted with vendor-companies who provided community canvassing and flyer distribution services. City Colleges of Chicago also sponsored community events organized by, or affiliated with, third parties by paying the third parties to promote City Colleges of Chicago at the

community events, including by distributing City Colleges of Chicago literature and displaying the City Colleges of Chicago logo.

c. Defendant SHAROD GORDON was employed by City Colleges of Chicago, first as District Director of Community Affairs, then as Associate Vice Chancellor of Community Relations and Student Recruitment, and finally as Vice Chancellor of Legislative and Community Affairs. GORDON's duties included, among other things, soliciting quotes from potential vendors to provide services to City Colleges of Chicago, recommending vendors to City Colleges of Chicago, reviewing invoices from vendors and considering bids for contracts with City Colleges of Chicago, reviewing requests and submitting invoices from third parties for community event sponsorships, and approving invoices in certain circumstances. As an employee of City Colleges of Chicago, GORDON owed a duty of honest services to City Colleges of Chicago.

d. Defendant ANGELIQUE ORR was married to GORDON from in or around November 1998 until in or around September 2013.

e. Company A was a consulting company organized in the State of Illinois. ORR was listed as Company A's registered agent.

f. Nonprofit A was a nonprofit organization based in Chicago, Illinois. The executive director of Nonprofit A was Individual A.

g. Defendant KRYSTAL STOKES was employed by City Colleges of Chicago as a community outreach worker.

h. Company B was a company organized in the State of Illinois. STOKES was listed as Company B's registered agent, and STOKES and Individual B, who was a family member of GORDON, were listed as members of Company B.

i. Individual C was an associate of STOKES.

j. Defendant MARVA SMITH, a/k/a "Marva Hall," was employed by City Colleges of Chicago as a liaison to governmental agencies.

k. Nonprofit B was a nonprofit organization providing college and career preparation services. SMITH was a member of the Board of Directors of Nonprofit B, and Individual D was Nonprofit B's executive director.

l. Defendant TIFFANY McQUEEN was an associate of GORDON and was the registered agent and manager of Company C.

m. Company C was organized in the State of Illinois.

n. Individual E was McQUEEN's mother.

o. Defendant NANCY VAZQUEZ was a lobbyist who ran Company D.

p. Company D was a lobbying and consulting firm that was incorporated in the State of Illinois. Individual F was the president and director of Company D, and was a family member of VAZQUEZ.

q. Defendant MARQUITA PAYNE, a/k/a "Marquita Cunningham," was an associate of GORDON and was the registered agent and manager of Company E.

r. Company E was a consulting business organized in the State of Illinois.

s. Defendant TIFFANY CAPEL was an associate of GORDON and was the sole proprietor of Company F.

t. Company F was a marketing, branding and apparel design business.

u. Individual G was an associate of GORDON and the managing director of Nonprofit C.

v. Nonprofit C was a nonprofit organization begun with the goal of operating a charter school.

Applicable City Colleges of Chicago Policies

w. City Colleges of Chicago's "Board Policies and Procedures for Management and Government" set forth the purchasing and contracting policies employed by City Colleges of Chicago, including the following:

i. The policies and procedures provided that "[g]oods or nonprofessional services . . . should be purchased from the vendor who can provide the required goods at the lowest price available."

ii. With respect to purchases of \$2,500 and up to and including \$25,000, the policies and procedures further provided that "informal competitive bidding is required" and "each user department must obtain three

written bid quotations, . . . specifically describing the goods or services and their prices.”

iii. With respect to individual purchases in excess of \$25,000, the policies and procedures required formal competitive bidding, including approval from City Colleges of Chicago’s Board. Similarly, multiple purchases in a fiscal year from a single vendor-company, totaling in excess of \$25,000, also required formal competitive bidding, including approval from City Colleges of Chicago’s Board.

x. According to City Colleges of Chicago’s Employee Manual, employees were prohibited from engaging in numerous types of conduct, including the following:

i. Engaging in a profession, business trade investment, occupation or other activity that would result in a conflict of interest with their employment;

ii. Misappropriation of any funds of City Colleges of Chicago;
and

iii. Failing to comply with laws, City Colleges of Chicago Board Rules or policies, and departmental policies concerning procurement and purchasing of goods and services.

y. According to City Colleges of Chicago’s Ethics Policy, employees were prohibited from engaging in numerous types of conduct in which they had a “special interest.” The Ethics Policy defined a “special interest” as “any economic or

other personal interest that is in any way distinguishable from the interests of the public generally and shall include the economic or other personal interest of a spouse; it may include, but not limited to, a romantic or familial relationship.” The prohibitions related to a “special interest” provided that:

i. No employee was permitted to make or participate in the making of any decision or take any action with respect to any matter in which he or she had any special interest; and

ii. Any employee who had a special interest in any action or activity pending before the Board or any of the Colleges was required to disclose the nature of such interest to the head of the department or division to whom that employee reported. In the case of any special interest of any Vice Chancellor or head of any department or division of a College, such disclosure was to be made to the Chancellor or to the president of the College.

The Scheme

2. Beginning in or around April 2013, and continuing to in or around May 2017, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAROD GORDON,
ANGELIQUE ORR,
KRYSTAL STOKES,
MARVA SMITH, a/k/a “Marva Hall,”
TIFFANY McQUEEN,
NANCY VAZQUEZ,
MARQUITA PAYNE, a/k/a “Marquita Cunningham,” and
TIFFANY CAPEL,

defendants herein, as well as others known and unknown to the grand jury, knowingly devised, intended to devise, and participated in a scheme to defraud City Colleges of Chicago of money and property, by means of materially false and fraudulent pretenses, representations, and promises, and by the concealment of material facts, and of the intangible right to the honest services of defendant SHAROD GORDON through kickbacks, as further described below.

3. It was part of the scheme that GORDON and his co-schemers made materially false and fraudulent representations to make it falsely appear that GORDON, STOKES, and SMITH had no personal or economic interest in, and were not associated with certain individuals and entities that GORDON, in his capacity as a City Colleges of Chicago employee, selected, or caused to be selected, for the award of community canvassing and flyer distribution contracts. These false and fraudulent representations were made for the purpose of concealing that GORDON, STOKES, and SMITH were receiving payments from City Colleges of Chicago on community canvassing and flyer distribution contracts awarded, or caused to be awarded, by GORDON, which payments they were not permitted to receive under applicable City Colleges of Chicago policies.

4. It was further part of the scheme that GORDON and ORR made materially false and fraudulent representations to make it falsely appear that GORDON had no personal or economic interest in, and was not associated with, certain individuals and entities that GORDON, in his capacity as a City Colleges of

Chicago employee, selected, or caused to be selected, for the award of community event sponsorships. These false and fraudulent representations were made for the purpose of concealing that ORR was receiving payments from City Colleges of Chicago for community event sponsorships awarded, or caused to be awarded, by GORDON, which payments ORR was not permitted to receive under applicable City Colleges of Chicago policies.

5. It was further part of the scheme that GORDON obtained kickbacks from individuals and entities that GORDON selected, or caused to be selected, for the award of community canvassing and flyer distribution contracts and for whom GORDON approved, or caused the approval of, invoices for community canvassing and flyer distribution services.

6. It was further part of the scheme that GORDON, ORR, STOKES, SMITH, McQUEEN, and VAZQUEZ, among others, used existing entities associated with third parties, used the names of third parties, and formed and caused the formation of companies, to apply as vendor-companies for community canvassing and flyer distribution contracts with City Colleges of Chicago, and through the use of these entities, third-parties, and companies concealed and disguised the fact that payments made to these vendor-companies would be diverted to GORDON, ORR, STOKES, SMITH, McQUEEN, and VAZQUEZ.

7. It was further part of the scheme that GORDON, ORR, SMITH, McQUEEN, and VAZQUEZ, among others, prepared and submitted, and caused to

be prepared and submitted, to City Colleges of Chicago vendor applications and invoices on behalf of the vendor-companies in which they made material misrepresentations in order to conceal personal and economic interests of GORDON, ORR, SMITH, McQUEEN, and VAZQUEZ, among others, in the vendor-companies.

8. It was further part of the scheme that GORDON steered community canvassing and flyer distribution contracts to several different vendor-companies in order to avoid City Colleges of Chicago's policy requiring formal competitive bidding, including Board approval, for individual purchases exceeding \$25,000, as well as for multiple purchases in a fiscal year from a single vendor-company totaling in excess of \$25,000.

9. It was further part of the scheme that GORDON monitored the approval of the invoices for payment and, in some cases, expedited the approval process in order to ensure express payment of the vendor-companies selected to provide community canvassing and flyer distribution services and of the third parties who had requested community event sponsorships.

10. It was further part of the scheme that, through the submission of the invoices, the defendants caused City Colleges of Chicago to initiate electronic funds transfers and issue checks to these vendor-companies and third parties.

11. It was further part of the scheme that, after City Colleges of Chicago caused electronic funds transfers and checks to issue to these vendor-companies and third parties, SMITH, McQUEEN, VAZQUEZ, PAYNE, and CAPEL, among others,

paid and caused to be paid to GORDON, or to individuals and entities associated with GORDON, kickbacks of a portion of the payments from City Colleges of Chicago.

**GORDON's and ORR's Use of Nonprofit A and Company A
To Obtain Funds from City Colleges of Chicago**

12. It was further part of the scheme that, for the purpose of concealing that ORR would personally benefit from payments on contracts and community event sponsorships awarded by City Colleges of Chicago, GORDON and ORR prepared, submitted, and caused to be prepared and submitted, invoices to City Colleges of Chicago in the names of Nonprofit A and Company A that purportedly sought payments solely for the benefit of Nonprofit A and Company A, for community canvassing and flyer distribution services to be completed by Nonprofit A and Company A, and for community events affiliated with Company A, when in truth, portions of such payments were intended for ORR.

13. It was further part of the scheme that ORR falsely told Individual A that ORR could not contract with City Colleges of Chicago for tax-related reasons, and agreed with Individual A that Nonprofit A would serve as ORR's fiscal agent for the purpose of receiving payments from City Colleges of Chicago intended for ORR.

14. It was further part of the scheme that ORR and GORDON communicated via email to coordinate the submission of false invoices to City Colleges of Chicago that purportedly sought payments solely for the benefit of Nonprofit A and Company A.

15. It was further part of the scheme that, in order to conceal their connection to Company A, GORDON and ORR submitted invoices to City Colleges of Chicago for community canvassing and flyer distribution services to be completed by Company A by using an email account in the name of Company A and listing a fictitious employee of Company A on at least one such invoice.

16. It was further part of the scheme that, in order to conceal their connection to Company A, GORDON and ORR submitted to City Colleges of Chicago requests for sponsorships of community events affiliated with Company A by listing the names of fictitious employees of Company A on such requests and on correspondence to City Colleges of Chicago concerning such requests.

17. It was further part of the scheme that, after City Colleges of Chicago paid invoices submitted in the names of Nonprofit A and Company A, ORR received some of the proceeds that had been paid to Nonprofit A and Company A by City Colleges of Chicago.

**GORDON's and STOKES's Use of Company B
To Obtain Funds from City Colleges of Chicago**

18. It was further part of the scheme that, for the purpose of concealing that GORDON and STOKES would personally benefit from payments on contracts awarded by City Colleges of Chicago, GORDON prepared, submitted, and caused to be prepared and submitted, invoices to City Colleges of Chicago in the name of Company B that purportedly sought payments solely for the benefit of Company B, for community canvassing and flyer distribution services to be completed by Company

B when in truth, such payments were intended for GORDON and STOKES.

19. It was further part of the scheme that, in or around December 2014, GORDON directed STOKES to organize Company B in the State of Illinois, listing STOKES as the registered agent and STOKES and Individual B as members of Company B.

20. It was further part of the scheme that, on or about December 18, 2014, GORDON directed STOKES and Individual B to open a bank account for Company B in the names of STOKES and Individual B.

21. It was further part of the scheme that GORDON represented that he worked as a consultant with Company B beginning in or around 2010 until at least in or around February 2017.

22. It was further part of the scheme that in order to conceal GORDON's and STOKES's association with and interest in Company B, GORDON submitted and caused to be submitted a vendor application form on behalf of Company B to City Colleges of Chicago, which listed Individual B as the point-of-contact for Company B, when in truth, GORDON and STOKES directed and controlled Company B.

23. It was further part of the scheme that in order to conceal that GORDON and STOKES were intended recipients of payments made to Company B, GORDON submitted and caused to be submitted invoices to City Colleges of Chicago in the name of Company B for community canvassing and flyer distribution services to be completed by Company B.

24. It was further part of the scheme that GORDON, STOKES, and Company B did not perform certain of the community canvassing and flyer distribution services for which invoices were submitted to City Colleges of Chicago.

25. It was further part of the scheme that after City Colleges of Chicago paid invoices submitted in the name of Company B in the amounts requested, GORDON and STOKES used those payments for their personal benefit.

26. It was further part of the scheme that when asked by City Colleges of Chicago to disclose any outside employment and money earned through such outside employment, STOKES did not disclose her association with, and money she received through, Company B.

27. It was further part of the scheme that at GORDON's direction, other vendor-companies that had received payments from City Colleges of Chicago for community canvassing and flyer distribution contracts that GORDON had steered toward those companies—namely, SMITH through Nonprofit B and Individual G through Nonprofit C—provided kickbacks to GORDON in the form of payments to Company B, thus concealing from City Colleges of Chicago that payments it made to other vendor-companies would personally benefit GORDON.

**GORDON's and SMITH's Use of Nonprofit B
To Obtain Funds from City Colleges of Chicago**

28. It was further part of the scheme that, for the purpose of concealing that GORDON and SMITH would personally benefit from payments on contracts awarded by City Colleges of Chicago, GORDON and SMITH prepared, submitted, and caused

to be prepared and submitted invoices to City Colleges of Chicago in the name of Nonprofit B that purportedly sought payments solely for the benefit of Nonprofit B for community canvassing and flyer distribution services to be completed by Nonprofit B, when in truth, a portion of such payments were intended for GORDON and SMITH.

29. It was further part of the scheme that in order to conceal their association with and interest in Nonprofit B, GORDON and SMITH submitted, and caused to be submitted, a vendor application form on behalf of Nonprofit B to City Colleges of Chicago, which listed Individual D as the point-of-contact for Nonprofit B.

30. It was further part of the scheme that, in order to conceal that GORDON and SMITH were the intended recipients of payments made to Nonprofit B, GORDON and SMITH submitted and caused to be submitted invoices to City Colleges of Chicago in the name of Nonprofit B for community canvassing and flyer distribution services to be completed by Nonprofit B.

31. It was further part of the scheme that, after City Colleges of Chicago paid the invoices in the amounts requested, SMITH withdrew and caused to be withdrawn money from Nonprofit B's bank account and paid kickbacks directly and indirectly to GORDON, including by making payments to Company B.

**GORDON's and McQUEEN's Use of Company C
To Obtain Funds from City Colleges of Chicago**

32. It was further part of the scheme that, for the purpose of concealing that GORDON and McQUEEN would personally benefit from payments on contracts

awarded by City Colleges of Chicago, GORDON and McQUEEN prepared, submitted, and caused to be prepared and submitted, invoices to City Colleges of Chicago in the name of Company C that purportedly sought payments solely for the benefit of Company C for community canvassing and flyer distribution services to be completed by Company C, when in truth, a portion of such payments were intended for GORDON and McQUEEN.

33. It was further part of the scheme that GORDON and McQUEEN caused Company C to submit a vendor application form to City Colleges of Chicago, listing Individual E as its point of contact.

34. It was further part of the scheme that in order to conceal that GORDON and McQUEEN were the intended recipients of payments made to Company C, GORDON and McQUEEN submitted and caused to be submitted invoices to City Colleges of Chicago in the name of Company C for community canvassing and flyer distribution services to be completed by Company C.

35. It was further part of the scheme that, after City Colleges of Chicago paid the invoices, McQUEEN withdrew and caused to be withdrawn money from Company C's bank account and paid kickbacks to GORDON.

**GORDON's and VAZQUEZ's Use of Company D
To Obtain Funds from City Colleges of Chicago**

36. It was further part of the scheme that, for the purpose of concealing that GORDON and VAZQUEZ would personally benefit from payments on contracts awarded by City Colleges of Chicago, GORDON and VAZQUEZ prepared, submitted,

and caused to be prepared and submitted invoices to City Colleges of Chicago in the name of Company D that purportedly sought payments solely for the benefit of Company D for community canvassing and flyer distribution services to be completed by Company D, when in truth, a portion of such payments were intended for GORDON and VAZQUEZ.

37. It was further part of the scheme that GORDON and VAZQUEZ caused Company D to submit a vendor application form to City Colleges of Chicago, which listed Individual F as its point of contact when in truth, VAZQUEZ directed and controlled Company D.

38. It was further part of the scheme that in order to conceal that GORDON and VAZQUEZ were the intended recipients of payments made to Company D, GORDON and VAZQUEZ submitted and caused to be submitted invoices to City Colleges of Chicago in the name of Company D for community canvassing and flyer distribution services to be completed by Company D.

39. It was further part of the scheme that, after City Colleges of Chicago paid invoices submitted in the name of Company D, VAZQUEZ withdrew and caused to be withdrawn money from Company D's bank account and paid kickbacks directly and indirectly to GORDON.

**GORDON's and PAYNE's Use of Company E
To Obtain Funds from City Colleges of Chicago**

40. It was further part of the scheme that, for the purpose of concealing that GORDON would personally benefit from payments on contracts awarded by City

Colleges of Chicago, GORDON and PAYNE prepared, submitted, and caused to be prepared and submitted invoices to City Colleges of Chicago in the name of Company E that purportedly sought payments solely for the benefit of Company E for community canvassing and flyer distribution services to be completed by Company E, when in truth, a portion of such payments were intended for GORDON.

41. It was further part of the scheme that GORDON, PAYNE, and Company E did not perform certain of the community canvassing and flyer distribution services for which invoices were submitted to City Colleges of Chicago.

42. It was further part of the scheme that, after City Colleges of Chicago paid the invoices, PAYNE withdrew and caused to be withdrawn money from Company E's bank account and paid kickbacks to GORDON.

**GORDON's and CAPEL's Use of Company F
To Obtain Funds from City Colleges of Chicago**

43. It was further part of the scheme that, for the purpose of concealing that GORDON would personally benefit from a payment on a contract awarded by City Colleges of Chicago, GORDON and CAPEL prepared, submitted, and caused to be prepared and submitted an invoice to City Colleges of Chicago in the name of Company F that purportedly sought payment solely for the benefit of Company F for community canvassing and flyer distribution services to be completed by Company F, when in truth, a portion of such payment was intended for GORDON.

44. It was further part of the scheme that GORDON, CAPEL, and Company F did not perform certain of the community canvassing and flyer distribution services

for which an invoice was submitted to City Colleges of Chicago.

45. It was further part of the scheme that, after City Colleges of Chicago made a payment to Company F, CAPEL withdrew and caused to be withdrawn money from CAPEL's bank account and paid a kickback to GORDON.

46. On or about April 10, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAROD GORDON and
ANGELIQUE ORR,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an electronic funds transfer of approximately \$6,000 from an account at JP Morgan Chase Bank to an account at U.S. Bank, which transfer of funds represented a payment by City Colleges of Chicago for an invoice submitted in the name of Company A dated April 8, 2015, and which wire communication was routed across state lines;

In violation of Title 18, United States Code, Section 1343.

COUNT TWO

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about May 1, 2015, at Chicago, in the Northern District of Illinois,

Eastern Division, and elsewhere,

SHAROD GORDON and
ANGELIQUE ORR,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an electronic funds transfer of approximately \$10,000 from an account at JP Morgan Chase Bank to an account at U.S. Bank, which transfer of funds represented a payment by City Colleges of Chicago for an invoice submitted in the name of Company A dated April 23, 2015, and which wire communication was routed across state lines;

In violation of Title 18, United States Code, Section 1343.

COUNT THREE

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about July 17, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAROD GORDON and
ANGELIQUE ORR,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, data relating to the negotiation of check number 23131631, in the amount of approximately \$9,000 from an account at JP Morgan Chase Bank to an account at U.S. Bank, which represented a payment by City Colleges of Chicago for an invoice submitted in the name of Company A dated June 5, 2015, and which wire communication was routed across state lines;

In violation of Title 18, United States Code, Section 1343.

COUNT FOUR

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about August 21, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAROD GORDON and
ANGELIQUE ORR,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an electronic funds transfer of approximately \$2,000 from an account at JP Morgan Chase Bank to an account at U.S. Bank, which transfer of funds represented a payment by City Colleges of Chicago for an invoice submitted in the name of Company A dated August 14, 2015, and which wire communication was routed across state lines;

In violation of Title 18, United States Code, Section 1343.

COUNT FIVE

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about October 31, 2016, at Chicago, in the Northern District of

Illinois, Eastern Division, and elsewhere,

SHAROD GORDON and
ANGELIQUE ORR,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, data relating to the negotiation of check number 23143289, in the amount of approximately \$2,500 from an account at JP Morgan Chase Bank to an account at U.S. Bank, which represented a payment by City Colleges of Chicago for an invoice submitted in the name of Company A dated October 25, 2016, and which wire communication was routed across state lines;

In violation of Title 18, United States Code, Section 1343.

COUNT SIX

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about February 24, 2016, at Chicago, in the Northern District of

Illinois, Eastern Division, and elsewhere,

SHAROD GORDON and
KRYSTAL STOKES,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, data relating to the negotiation of check number 23137612, in the amount of approximately \$7,000 from an account at JP Morgan Chase Bank to an account at Bank of America, which represented a payment by City Colleges of Chicago for an invoice submitted in the name of Company B dated in or around February 2016, and which wire communication was routed across state lines;

In violation of Title 18, United States Code, Section 1343.

COUNT SEVEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about June 8, 2016, at Chicago, in the Northern District of Illinois,

Eastern Division, and elsewhere,

SHAROD GORDON and
KRYSTAL STOKES,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, data relating to the negotiation of check number 23140073, in the amount of approximately \$13,000 from an account at JP Morgan Chase Bank to an account at Bank of America, which represented a payment by City Colleges of Chicago for an invoice submitted in the name of Company B dated in or around June 2016, and which wire communication was routed across state lines;

In violation of Title 18, United States Code, Section 1343.

COUNT EIGHT

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about May 26, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAROD GORDON and
MARVA SMITH, a/k/a “Marva Hall,”

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, data relating to the negotiation of check number 23131377, in the amount of approximately \$24,000 from an account at JP Morgan Chase Bank to an account at Bank of America, which represented a payment by City Colleges of Chicago to Nonprofit B related to an invoice submitted to City Colleges of Chicago in the name of Nonprofit B dated May 18, 2015, and which wire communication was routed across state lines;

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

COUNT NINE

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about June 10, 2016, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAROD GORDON and
MARVA SMITH, a/k/a “Marva Hall,”

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, data relating to the negotiation of check number 23140077, in the amount of approximately \$17,000 from an account at JP Morgan Chase to an account at Bank of America, which represented a payment by City Colleges of Chicago to Nonprofit B related to an invoice submitted to City Colleges of Chicago in the name of Nonprofit B dated June 3, 2016, and which wire communication was routed across state lines;

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

COUNT TEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about May 21, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAROD GORDON and
TIFFANY MCQUEEN,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, data relating to the negotiation of check number 23131376, in the amount of approximately \$20,000 from an account at JP Morgan Chase Bank to another account at JP Morgan Chase Bank, which represented a payment by City Colleges of Chicago for an invoice submitted in the name of Company C dated May 20, 2015, and which wire communication was routed across state lines;

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

COUNT ELEVEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about June 8, 2016, at Chicago, in the Northern District of Illinois,

Eastern Division, and elsewhere,

SHAROD GORDON and
TIFFANY MCQUEEN,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, data relating to the negotiation of check number 23140074, in the amount of approximately \$15,000 from an account at JP Morgan Chase Bank to another account at JP Morgan Chase Bank, which represented a payment by City Colleges of Chicago for an invoice submitted in the name of Company C dated June 3, 2016, and which wire communication was routed across state lines;

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

COUNT TWELVE

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about November 26, 2014, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAROD GORDON and
NANCY VAZQUEZ,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an electronic funds transfer of approximately \$20,000 from an account at JP Morgan Chase Bank to an account at U.S. Bank, which transfer of funds represented a payment by City Colleges of Chicago for an invoice submitted in the name of Company D dated November 24, 2014, and which wire communication was routed across state lines;

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

COUNT THIRTEEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about February 11, 2015, at Chicago, in the Northern District of

Illinois, Eastern Division, and elsewhere,

SHAROD GORDON and
NANCY VAZQUEZ,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, data relating to the negotiation of check number 23128526, in the amount of approximately \$5,000 from an account at JP Morgan Chase Bank to an account at U.S. Bank, which represented a payment by City Colleges of Chicago for an invoice submitted in the name of Company D dated in or around February 2015, and which wire communication was routed across state lines;

In violation of Title 18, United States Code, Section 1343.

COUNT FOURTEEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about October 6, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAROD GORDON and
MARQUITA PAYNE, a/k/a “Marquita Cunningham,”

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, data relating to the negotiation of check number 23134275, in the amount of approximately \$5,000 from an account at JP Morgan Chase to another account at JP Morgan Chase, which represented a payment by City Colleges of Chicago for an invoice submitted in the name of Company E dated September 25, 2015, and which wire communication was routed across state lines;

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

COUNT FIFTEEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about December 21, 2015, at Chicago, in the Northern District of

Illinois, Eastern Division, and elsewhere,

SHAROD GORDON and
MARQUITA PAYNE, a/k/a “Marquita Cunningham,”

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, data relating to the negotiation of check number 23136036, in the amount of approximately \$10,000 from an account at JP Morgan Chase to another account at JP Morgan Chase, which represented a payment by City Colleges of Chicago for an invoice submitted in the name of Company E dated December 10, 2015, and which wire communication was routed across state lines;

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

COUNT SIXTEEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraphs 1 through 45 of Count One are incorporated here.
2. On or about June 24, 2016, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAROD GORDON and
TIFFANY CAPEL,

defendants herein, for the purpose of executing the scheme, knowingly caused to be transmitted in interstate commerce by means of wire communication certain writings, signs, and signals, namely, an electronic funds transfer of approximately \$15,000 from an account at JP Morgan Chase to an account at Bank of America, which transfer of funds represented a payment by City Colleges of Chicago for an invoice submitted in the name of Company F dated June 15, 2016, and which wire communication was routed across state lines;

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

COUNT SEVENTEEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraph 1(a)-(e), (g)-(i), and (w)-(y) of Count One is incorporated here.

2. Prior to on or about September 11, 2018, agents assigned to the Chicago office for the Federal Bureau of Investigation located at Chicago, in the Northern District of Illinois, had initiated an investigation of GORDON and STOKES concerning potential violations of federal criminal law.

3. One issue material to the investigation conducted by the Federal Bureau of Investigation was STOKES's knowledge concerning the activities of Company B, Individual B, and Individual C, and their involvement in contracts awarded by City Colleges of Chicago.

4. On or about September 11, 2018, at North Bay Village, Florida,

KRYSTAL STOKES,

defendant herein, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency within the executive branch of the United States government, when STOKES was interviewed by FBI agents and stated in substance that she was not familiar with Company B, Individual B, and Individual C;

In violation of Title 18, United States Code, Section 1001(a)(2).

COUNT EIGHTEEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Paragraph 1(a)-(c), (l)-(n), and (w)-(y) of Count One is incorporated here.

2. Prior to on or about June 26, 2018, agents assigned to the Chicago office for the Federal Bureau of Investigation located at Chicago, in the Northern District of Illinois, had initiated an investigation of GORDON and McQUEEN concerning potential violations of federal criminal law.

3. One issue material to the investigation conducted by the Federal Bureau of Investigation was McQUEEN's knowledge concerning the activities of Company C and Individual E, and their involvement in contracts awarded by City Colleges of Chicago.

4. On or about June 26, 2018, at Naperville, in the Northern District of Illinois, Eastern Division,

TIFFANY MCQUEEN,

defendant herein, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency within the executive branch of the United States government, when McQUEEN was interviewed by FBI agents and stated in substance that she was not familiar with the name Individual E;

In violation of Title 18, United States Code, Section 1001(a)(2).

FORFEITURE ALLEGATION

The SPECIAL JUNE 2018 GRAND JURY alleges:

1. Counts One through Sixteen of this indictment are incorporated here for the purpose of alleging forfeiture 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).

2. As a result of the offenses charged in Counts One through Sixteen of this indictment,

SHAROD GORDON,
ANGELIQUE ORR,
KRYSTAL STOKES,
MARVA SMITH, a/k/a “Marva Hall,”
TIFFANY MCQUEEN,
NANCY VAZQUEZ,
MARQUITA PAYNE, a/k/a “Marquita Cunningham,” and
TIFFANY CAPEL,

defendants herein, shall forfeit to the United States any and all right, title, and interest they have in any property, real and personal, which constitutes or is derived from proceeds traceable to the offenses in Counts One through Sixteen.

3. The interests of defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) as incorporated by Title 28, United States Code, Section 2461(c), include but are not limited to approximately \$349,500.

4. If, as a result of any act or omission by the defendants, any of the forfeitable property described above:

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 shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

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