UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA)
) No.
v.)
) Violation: 18 U.S.C. § 666(a)(2)
WILLIAM A. HELM)

The SPECIAL JANUARY 2020 GRAND JURY charges:

- 1. At times material to this indictment:
- a. The State of Illinois was a government that received in excess of \$10,000 in federal benefits during the period from July 1, 2018 through June 30, 2019.
- b. Company A was a construction company that was engaged in a development project in East Dundee, Illinois.
- c. In or around 2017, Company A sought approval from the Illinois

 Department of Transportation ("IDOT") for signalization and roadwork in connection

 with its development project.
- d. Defendant WILLIAM A. HELM and his consulting company were retained by Company A to assist Company A in obtaining IDOT approval for signalization and roadwork in connection with Company A's development project.
- e. Martin Sandoval was an Illinois State Senator and the Chairman of the Senate Transportation Committee. As Chairman of the Senate Transportation Committee, Sandoval was in a position to assist with obtaining IDOT approvals for Company A's development project.

2. Beginning no later than in or around July 2018, and continuing at least until in or around November 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

WILLIAM A. HELM,

defendant herein, corruptly offered and agreed to give things of value, namely, money, intending to influence and reward Martin Sandoval, an agent of the State of Illinois, in connection with any business, transaction, and series of transactions of the State of Illinois involving a thing of value of \$5,000 or more, namely, IDOT approval for signalization and roadwork related to Company A's development project in East Dundee, Illinois;

In violation of Title 18, United States Code, Section 666(a)(2).

	A TRUE BILL:
	FOREPERSON
UNITED STATES ATTORNEY	