

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	No.
	)	
v.	)	Violations: 18 U.S.C. §§ 1001 and
	)	1952(a)(3) and 26 U.S.C.
LOUIS PRESTA	)	§§ 7206(1) and 7203

**COUNT ONE**

The SPECIAL JANUARY 2020 GRAND JURY charges:

On or about February 15, 2018, at approximately 10:32 a.m., in the Northern District of Illinois, Eastern Division, and elsewhere,

LOUIS PRESTA,

defendant herein, used a facility in interstate commerce, namely, a cellular telephone assigned telephone number (708) XXX-4063, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely, a violation of 720 ILCS 5/33-1(d) (Bribery) and 720 ILCS 5/33-3(a)(4) (Official Misconduct), and thereafter, the defendant did perform and attempt to perform an act to carry on and facilitate the promotion and carrying on of said unlawful activity;

In violation of Title 18, United States Code, Section 1952(a)(3).

**COUNT TWO**

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about February 28, 2018, at approximately 2:15 p.m., in the Northern District of Illinois, Eastern Division, and elsewhere,

LOUIS PRESTA,

defendant herein, used a facility in interstate commerce, namely, a cellular telephone assigned telephone number (708) XXX-4063, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely, a violation of 720 ILCS 5/33-1(d) (Bribery) and 720 ILCS 5/33-3(a)(4) (Official Misconduct), and thereafter, the defendant did perform and attempt to perform an act to carry on and facilitate the promotion and carrying on of said unlawful activity;

In violation of Title 18, United States Code, Section 1952(a)(3).

**COUNT THREE**

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about April 5, 2018, at approximately 12:30 p.m., in the Northern District of Illinois, Eastern Division, and elsewhere,

LOUIS PRESTA,

defendant herein, used a facility in interstate commerce, namely, a cellular telephone assigned telephone number (708) XXX-4063, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely, a violation of 720 ILCS 5/33-1(d) (Bribery) and 720 ILCS 5/33-3(a)(4) (Official Misconduct), and thereafter, the defendant did perform and attempt to perform an act to carry on and facilitate the promotion and carrying on of said unlawful activity;

In violation of Title 18, United States Code, Section 1952(a)(3).

## COUNT FOUR

The SPECIAL JANUARY 2020 GRAND JURY further charges:

1. At times material to Count Six of this indictment:
  - a. The Village of Crestwood was a unit of local government in the Northern District of Illinois.
  - b. Defendant LOUIS PRESTA was the Mayor of Crestwood.
  - c. Company A was a Chicago-area company that provided red-light cameras that enabled municipalities, including Crestwood, to enforce certain traffic violations and issue traffic-violation tickets.
  - d. During the time that Company A provided and attempted to provide additional red-light-camera services to Crestwood, PRESTA asked for and accepted benefits from representatives of Company A, including Individual A.
  - e. Prior to on or about September 26, 2019, the Federal Bureau of Investigation and Internal Revenue Service had initiated an investigation of LOUIS PRESTA concerning potential violations of federal criminal law.
  - f. The following matters, among others, were material to the investigation:
    - i. PRESTA's relationships with Company A and Individual A, including his requests for and receipt of campaign contributions, cash, and benefits from Company A and Individual A; and
    - ii. PRESTA's request for and receipt of money from Individual A.

2. On or about September 26, 2019, at Crestwood, in the Northern District of Illinois, Eastern Division, and elsewhere,

LOUIS PRESTA,

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 and the Internal Revenue Service, agencies within the executive branch of the government of the United States, when he stated the following:

- i. When asked if he had ever asked for campaign contributions from Company A or Individual A, PRESTA said that he had not.
- ii. When asked if he had ever received any gifts or cash contributions from Company A or Individual A, PRESTA said that he had not.
- iii. When asked if he had ever received any cash from Individual A, PRESTA said that he had not.
- iv. When asked if he received \$5,000 from Individual A on March 7, 2018, PRESTA said that he did not.
- v. When shown a recording of a March 7, 2018 meeting at which he accepted from Individual A an envelope containing \$5,000 in United States currency, PRESTA said that there was no money in the envelope.

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

**COUNT FIVE**

The SPECIAL JANUARY GRAND JURY 2020 further charges:

On or about April 15, 2015, in the Northern District of Illinois, Eastern Division, and elsewhere,

LOUIS PRESTA,

defendant herein, a resident of the Northern District of Illinois, having received gross income in excess of the amount required to file an income tax return, and thereby being required by law to file an income tax return (Form 1040 and accompanying attachments) following the close of the calendar year 2014 and on or before April 15, 2015, stating specifically the items of his gross income and any deductions and credits to which he was entitled, willfully failed to make and file an income tax return at the time required by law;

In violation of Title 26, United States Code, Section 7203.

**COUNT SIX**

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about October 16, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

LOUIS PRESTA,

defendant herein, willfully made, subscribed, and caused to be made and subscribed, a United States Individual Income Tax Return (Form 1040 with schedules and attachments) for the calendar year 2015, which return was made under penalties of perjury and was filed with the Internal Revenue Service, which income tax return he did not believe to be true and correct as to every material matter, in that Line 22 stated that his total income was \$12,000, when defendant knew that his total income substantially exceeded that amount;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT SEVEN**

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about April 15, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

LOUIS PRESTA,

defendant herein, willfully made, subscribed, and caused to be made and subscribed, a United States Individual Income Tax Return (Form 1040 with schedules and attachments) for the calendar year 2018, which return was made under penalties of perjury and was filed with the Internal Revenue Service, which income tax return he did not believe to be true and correct as to every material matter, in that Line 6 stated that his total income was \$97,566, when defendant knew that his total income substantially exceeded that amount;

In violation of Title 26, United States Code, Section 7206(1).



**FORFEITURE ALLEGATION**

The SPECIAL JANUARY 2020 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1952, as set forth in this indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), including at least approximately \$5,000.

2. If any of the property described above, as a result of any act or omission by a defendant: (1) cannot be located upon the exercise of due diligence; (2) has been transferred or sold to, or deposited with, a third party; (3) has been placed beyond the jurisdiction of the Court; (4) has been substantially diminished in value; or (5) 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, as provided in Title 21, United States Code Section 853(p).

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
Signed by Amarjeet S. Bhachu on behalf of the  
UNITED STATES ATTORNEY