

DEC 21 2021

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 DARRONTE REGGANS )  
 )

No. **21 CR 761**

Violations: Title 18, United States Code,  
Sections 1028A and 1343

Under Seal

The SPECIAL MAY 2021 GRAND JURY charges:

1. At times material to this Indictment:

a. The Illinois Department of Employment Security (“IDES”) operated the State of Illinois unemployment insurance program.

b. In Illinois, employers were required to register with IDES, file quarterly wage reports used to calculate their quarterly unemployment payroll tax contributions, and pay the corresponding contributions. An employee terminated without fault could file with IDES a claim for unemployment insurance benefits on the internet by providing his or her name, social security number, date of birth, employer information, and information about the cause of termination. Claimants in Illinois could choose to have their unemployment insurance benefits accessible through a debit card or directly deposited into a bank account.

c. To receive benefits, the claimant was required to certify certain eligibility information, including whether the claimant worked, was able and available to work, and actively sought work during the certification period. This could be done on the internet or by telephone. After a claimant completed this certification

process, if the IDES approved the claimant's application, benefits were paid via the payment method selected by the claimant, through either debit card or direct deposit.

2. Beginning no later than in or about March 2015, and continuing until on or about September 21, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

DARRONTE REGGANS,

defendant herein, knowingly devised, intended to devise, and participated in a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, as further described below.

3. It was part of the scheme that defendant REGGANS fraudulently obtained unemployment insurance benefits from IDES by filing and causing to be filed claims for unemployment insurance in the names of various individuals, without their permission or knowledge, in which claims REGGANS falsely and fraudulently represented that (a) these individuals had worked and been terminated without fault by various employers and (b) he was the individual identified in these claims entitled to the unemployment insurance benefits.

4. It was further part of the scheme that defendant REGGANS possessed and used the names, dates of birth, and social security numbers of these various individuals, without their permission or knowledge, to file and cause to be filed fraudulent claims for unemployment insurance benefits through the IDES website.

5. It was further part of the scheme that defendant REGGANS selected the debit card option as the method of payment of IDES funds when filing and causing to

be filed fraudulent claims for IDES unemployment insurance benefits using the identifying information of purported individual claimants and directed IDES to mail the debit cards to various addresses.

6. It was further part of the scheme that defendant REGGANS fraudulently completed and caused to be completed the IDES certification process in the names of purported IDES claimants, including by falsely representing to IDES that the claimants were entitled to benefits, had been available and able to work, and actively sought work during the certification period.

7. It was further part of the scheme that defendant REGGANS obtained, used, and caused to be used the IDES debit cards issued in the names of other individuals, which cards he used to withdraw the fraudulently obtained unemployment insurance benefits from automated teller machines ("ATMs") for his own benefit, knowing that he was not entitled to those funds.

8. It was further part of the scheme that defendant REGGANS filed and caused to be filed at least approximately 296 fraudulent unemployment insurance claims in the names of other individuals, altogether seeking at least approximately \$3,600,000 in unemployment insurance benefits and causing IDES to issue benefits totaling approximately \$174,000.

9. It was further part of the scheme that defendant REGGANS misrepresented, concealed and hid, and caused to be misrepresented, concealed and hidden, the purposes of and acts done in furtherance of the scheme.

10. On or about the dates set forth below, at South Chicago Heights and Richton Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

DARRONTE REGGANS,

defendant herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, listed below, each such writing, sign, and signal routed through the Chase Bank data center located in Wilmington, Delaware, and the US Bank data center located in Olathe, Kansas, and constituting a separate count:

Count	Date	Interstate Wire Communication
One	12/29/16	an electronic request to withdraw approximately \$800 from a Chase Bank ATM located in South Chicago Heights, using a debit card issued in the name of Victim M.M. and ending in 2628
Two	1/05/17	an electronic request to withdraw approximately \$860 from a Chase Bank ATM located in South Chicago Heights, using a debit card issued in the name of Victim J.A. and ending in 9361
Three	1/05/17	an electronic request to withdraw approximately \$800 from a US Bank ATM located in Richton Park, using a debit card issued in the name of Victim D.W. and ending in 6224
Four	1/19/17	an electronic request to withdraw approximately \$900 from a US Bank ATM located in Richton Park, using a debit card issued in the name of Victim J.A. and ending in 9361
Five	2/8/17	an electronic request to withdraw approximately \$860 from a US Bank ATM located in Richton Park, using a debit card issued in the name of Victim P.M. and ending in 5823
Six	2/16/17	an electronic request to withdraw approximately \$800 from a Chase Bank ATM located in South Chicago Heights, using a debit card issued in the name of Victim D.W. and ending in 6224
Seven	2/16/17	an electronic request to withdraw approximately \$880 from a Chase Bank ATM located in South Chicago Heights, using a debit card issued in the name of Victim R.N. and ending in 1393

Count	Date	Interstate Wire Communication
Eight	3/2/2017	an electronic request to withdraw approximately \$900 from a Chase Bank ATM located in South Chicago Heights, using a debit card issued in the name of Victim J.A. and ending in 9361
Nine	4/27/17	an electronic request to withdraw approximately \$800 from a Chase Bank ATM located in South Chicago Heights, using a debit card issued in the name of Victim T.J. and ending in 6335
Ten	7/27/17	an electronic request to withdraw approximately \$860 from a US Bank ATM located in Richton Park, using a debit card issued in the name of Victim T.J. and ending in 6335

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

**COUNT ELEVEN**

The SPECIAL MAY 2021 GRAND JURY further charges:

On or about March 2, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

**DARRONTE REGGANS,**

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Eight, knowingly possessed and used without lawful authority a means of identification of another person, namely, an access device in the name of Victim J.A., knowing that the means of identification belonged to another person;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT TWELVE**

The SPECIAL MAY 2021 GRAND JURY further charges:

On or about September 21, 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

**DARRONTE REGGANS,**

defendant herein, during and in relation to any felony, namely wire fraud as charged in Count Six, knowingly possessed and used without lawful authority a means of identification of another person, namely, the name, date of birth, and social security number of Victim D.W., knowing that the means of identification belonged to another person;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**FORFEITURE ALLEGATION**

The SPECIAL MAY 2021 GRAND JURY further charges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1343, 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).

2. The property to be forfeited includes, but is not limited to, a personal money judgment in the amount of approximately \$174,000.

3. If any of the property described above, as a result of any act or omission by defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or 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:

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FOREPERSON

\_\_\_\_\_  
UNITED STATES ATTORNEY