

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUDGE GUZMAN

UNITED STATES OF AMERICA)
)
 v.)
)
 WILLIAM WHITMAN)

No. **15CR 483**

Violations: Title 18, United States
Code, Sections 1341 and 1343

MAGISTRATE JUDGE MASON

COUNT ONE

The SPECIAL JANUARY 2015 GRAND JURY charges:

1. At times material to this indictment:

a. Defendant WILLIAM WHITMAN was a signatory on a joint bank account at Corporate America Family Credit Union, located in Elgin, Illinois.

b. Defendant WILLIAM WHITMAN had not earned a bachelor's degree from University A.

c. Defendant WILLIAM WHITMAN worked at Corporation A for approximately one month in April 2013. Corporation A terminated defendant's employment on or about April 26, 2013.

d. On or about July 8, 2013, defendant WILLIAM WHITMAN was sued in the Circuit Court of Cook County, Illinois, by his landlord for non-payment of rent and eviction. On or about August 12, 2013, the Circuit Court of Cook County entered a judgment ordering defendant to surrender possession of the premises he rented and to pay the landlord \$11,800 in damages.

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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

United States Postal Service Application and Hiring Process for Vice President of Corporate Communications

e. In approximately October 2013, the position of Vice President of Corporate Communications for the United States Postal Service was vacant. The Postal Service hired Search Firm A to conduct the initial search of candidates for this position.

f. As part of the application process, the Vice President of Corporate Communications applicant was required to submit a Postal Service Application for Employment. An applicant was required to certify that the information provided was true and correct, and to acknowledge that knowingly making a false statement or representation could subject the applicant to fine or imprisonment.

g. The Vice President of Corporate Communications position also mandated a top secret security clearance, which required a background check. As a part of the background check, the applicant had to submit to the United States Office of Personnel Management a background investigation form known as an SF-86. An applicant was required to certify on the SF-86 form that the information provided was true and correct, and to acknowledge that knowingly making a false statement or representation could subject the applicant to a fine and imprisonment.

h. Once hired, the Vice President of Corporate Communications was required to file a Public Financial Disclosure Form with the Postal Service disclosing past earnings.

i. Once hired, the Postal Service paid the Vice President of Corporate Communications primarily via Electronic Funds Transfer. These payments originated at the Postal Service's Accounting Center in St. Louis, Missouri. The Accounting Center transmitted a payment request to the Postal Service's Financial Center in Eagan, Minnesota. The Financial Center sent a request to the Federal Reserve Bank in New Jersey. Finally, the Federal Reserve Bank sent an EFT to the bank designated by the Vice President of Corporate Communications.

2. Beginning no later than December 2013, and continuing through June 2014, at Chicago and Elgin, in the Northern District of Illinois, Eastern Division, and elsewhere,

WILLIAM WHITMAN,

defendant herein, devised, and intended to devise, and participated in a scheme to defraud and to obtain money from the United States Postal Service by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts, which scheme is further described in the following paragraphs.

3. It was part of the scheme that, on or about December 4, 2013, defendant WILLIAM WHITMAN emailed a copy of his resume and biography to Search Firm A, in which defendant falsely and fraudulently stated that he earned a bachelor's degree from University A, and fraudulently concealed his brief employment with Corporation A in his biography.

4. It was further part of the scheme that, on or about December 16, 2013, defendant WILLIAM WHITMAN caused Search Firm A to send to the Postal Service his resume and "profile summary" in support of his application for the position of Vice President of Corporate Communications. WHITMAN knew that these materials falsely and fraudulently stated that he earned a bachelor's degree from University A, and fraudulently concealed his brief employment with Corporation A.

5. It was further part of the scheme that, on or about December 20, 2013, and January 28, 2014, defendant WILLIAM WHITMAN interviewed with Postal Service executives for the Vice President of Corporate Communications position. During these interviews, WHITMAN knowingly misrepresented that he earned a bachelor's degree from University A, and fraudulently concealed his employment with Corporation A.

6. It was further part of the scheme that, on or about February 24, 2014, defendant WILLIAM WHITMAN submitted a Postal Service Application for Employment to the Postal Service, in which he falsely and fraudulently stated that he earned a bachelor's degree from University A and had never been fired from a job.

7. It was further part of the scheme that on or about March 5, 2014, as a result of the false statements that WHITMAN made, and caused to be made, through the interview and application process, the Postal Service offered defendant the position of Vice President of Corporate Communications. The Postal Service

communicated this offer via a letter sent to defendant by United States mail to an address in Chicago.

8. It was further part of the scheme that, on or about March 30, 2014, defendant WILLIAM WHITMAN submitted a Public Financial Disclosure Report with the Postal Service in which he knowingly failed to disclose his employment at and income earned from Corporation A, and that he had a civil judgment entered against him.

9. It was further part of the scheme that, on or about May 10, 2014, defendant WILLIAM WHITMAN submitted an SF-86 to the United States Office of Personnel Management in which he knowingly omitted his employment with Corporation A and falsely responded "no" to questions that inquired if he had ever been fired from a job, evicted for non-payment of rent, and been a party to a civil suit.

10. It was further part of the scheme that, between approximately April and June 2014, defendant WILLIAM WHITMAN caused the Postal Service to issue to him salary, a signing bonus, and moving expense payments totaling approximately \$123,000.

11. It was further part of the scheme that defendant WILLIAM WHITMAN concealed, misrepresented, and hid, and caused to be concealed, misrepresented, and hidden certain material facts, including the acts and purposes of the acts done in furtherance of the scheme.

12. On or about March 5, 2014, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

WILLIAM WHITMAN,

defendant herein, for the purpose of executing the scheme, did knowingly cause to be delivered by mail, according to the directions thereon, a letter containing an offer of employment from the United States Postal Service, addressed to defendant in Chicago, Illinois;

In violation of Title 18, United States Code, Section 1341.

COUNT TWO

The SPECIAL JANUARY 2015 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One are incorporated here.
2. On or about April 11, 2014, at Elgin, in the Northern District of Illinois, Eastern Division, and elsewhere,

WILLIAM WHITMAN,

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, signals, and sounds, namely, an interstate wire transfer of approximately \$4,636.47 from the United States Postal Service Accounting Center in St. Louis, Missouri, to Corporate America Family Credit Union in Elgin, Illinois;

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

COUNT THREE

The SPECIAL JANUARY 2015 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One are incorporated here.
2. On or about June 20, 2014, at Elgin, in the Northern District of

Illinois, Eastern Division, and elsewhere,

WILLIAM WHITMAN,

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, signals, and sounds, namely, an interstate wire transfer of approximately \$4,472.46 from the United States Postal Service Accounting Center in St. Louis, Missouri, to Corporate America Family Credit Union in Elgin, Illinois;

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

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2015 GRAND JURY further charges:

1. The allegations contained in Counts One through Three of this indictment are incorporated here for the purpose of alleging forfeiture 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 his violations of Counts One through Three of the indictment,

WILLIAM WHITMAN,

defendant herein, shall forfeit to the United States, any right, title, and interest they may have in any property, real and personal, which constitutes and is derived from proceeds traceable to the charged offenses.

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461(c) include, but are not limited to:

a. All money and property, real and personal, that constitutes and was derived from the proceeds obtained, directly or indirectly, from the violations in the indictment, including approximately \$123,000.

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

- (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 of America 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