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FILED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JAN 27 2020 AC

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

UNITED STATES OF AMERICA)
)
 v.)
)
 MARTIN A. SANDOVAL)

No. **20 CR 56**

Violations: 18 U.S.C. § 666(a)(1)(B) and
26 U.S.C. § 7206(1)

JUDGE WOOD

COUNT ONE

MAGISTRATE JUDGE HARJANI

The UNITED STATES ATTORNEY charges:

Beginning in or around 2016, and continuing until in or around September 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

MARTIN A. SANDOVAL,

defendant herein, as an agent of the State of Illinois, namely, a State Senator and Chairman of the Senate Transportation Committee, which received in excess of \$10,000 in federal benefits during the period from January 1, 2018 through December 31, 2018, corruptly solicited, demanded, agreed to accept, and accepted things of value, namely, money, intending to be influenced and rewarded in connection with a business, transaction, and series of transactions of the State of Illinois involving a thing of value of \$5,000 or more, namely, continued support for the operation of red-light cameras in the State of Illinois, including opposing legislation adverse to the interests of the red-light-camera industry;

In violation of Title 18, United States Code, Section 666(a)(1)(B).

COUNT TWO

The UNITED STATES ATTORNEY further charges:

On or about October 12, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

MARTIN A. SANDOVAL,

defendant herein, willfully made and 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 2017, which return was verified by written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material mater, in that said return reported on Line 22 that the total income was \$125,905, when defendant knew that the total income substantially exceeded that amount;

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

UNITED STATES ATTORNEY