

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
 v.) Violation: Title 18, United States Code,
) Section 1001(a)(1)
TIMOTHY VEIT)

The UNITED STATES ATTORNEY charges:

1. At times material to this Information:

a. Defendant TIMOTHY VEIT was a police officer employed as the Commander of the Support Services Division of the Des Plaines Police Department in Des Plaines, Illinois.

b. The National Highway Traffic Safety Administration (NHTSA) was an operating administration of the United States Department of Transportation, an agency of the executive branch of the United States government, that administered and funded grants to state and local law enforcement agencies to enable them to conduct local highway safety programs. The grant programs funded by NHTSA included the Sustained Traffic Enforcement Program (STEP).

c. The Illinois Department of Transportation (IDOT) was the agency responsible for administering Illinois' federal highway safety funds, including the STEP grants.

d. The goal of the STEP was to induce motorists to drive safely. To achieve this goal, the STEP combined intensive enforcement of specific traffic safety laws with communication, education, and outreach informing the public about the enforcement

activity. The STEP required that enforcement campaigns occur at specific times of the day and specific times of the year, including Christmas/New Year's, St. Patrick's Day, Memorial Day, July 4th, Labor Day, and Thanksgiving, when alcohol-involved and unbuckled fatalities were highest.

e. A law enforcement agency applied for STEP grants by completing and submitting a Highway Safety Project Agreement (the "Agreement") to IDOT's Division of Traffic Safety. To determine the amount of STEP funding, the Agreement sought information from the law enforcement agency regarding the proposed enforcement programs, including impaired-driving enforcement and safety-belt enforcement, for each campaign; the estimated number of hours and officers for each program; and the average overtime compensation rate for the officers.

f. Among the provisions in the Agreement, the law enforcement agency agreed to submit a report monthly or as otherwise agreed of all safety activities related to the STEP grant received.

g. The Agreement also required a recipient law enforcement agency to identify its Project Director. The Project Director signed and dated the Agreement, affirming that he was authorized by the law enforcement agency to legally bind the agency to each and every item in the Agreement and that he had read and would comply with and assure continued compliance with each of the attached conditions and certifications, that the required responses and communications with IDOT were true and correct, and that the

signatures constituted an endorsement and execution of each condition and certification and assurance as though each was individually signed.

h. Defendant TIMOTHY VEIT served as the Project Director for the Des Plaines Police Department.

i. IDOT notified STEP grant recipients of the performance objectives for the STEP enforcement campaigns, which performance objectives included that the grant recipient average at least one Driving Under the Influence (DUI) arrest for every ten hours of overtime worked by law enforcement officers on impaired-driving enforcement campaigns.

j. STEP grants funded enforcement campaigns on a reimbursement basis. A recipient law enforcement agency paid the cost for program operations using local funds. After each enforcement campaign, the law enforcement agency then submitted a Highway Safety Project Claim for Reimbursement to IDOT. STEP grants only reimbursed the law enforcement agency for overtime pay for law enforcement officers, mileage, and equipment.

k. After each STEP enforcement campaign, IDOT required that a recipient law enforcement agency submit a Data Collection Form. The Data Collection Form requested information, including the identity of the person submitting the report, the total officer hours worked during the campaign, and the number of specific enforcement actions, such as DUI arrests, undertaken during the reporting period. The Data Collection Form also requested information regarding the blood-alcohol content level for each DUI arrest. IDOT used the information submitted on the Data Collection Forms to monitor the progress of the

law enforcement agency in satisfying the STEP's performance measures, as well as to determine the agency's STEP funding. IDOT required the law enforcement agency to complete and submit a Data Collection Form to IDOT prior to submitting a claim for reimbursement.

2. Beginning in or about 2009 and continuing until in or about 2012, at Des Plaines, in the Northern District of Illinois, Eastern Division,

TIMOTHY VEIT,

defendant herein, knowingly and willfully falsified, concealed and covered up by trick, scheme and device, material facts in a matter within the jurisdiction of the U.S. Department of Transportation, an agency within the executive branch of the Government of the United States, namely, the Des Plaines Police Department's failure to meet the STEP performance measures for impaired-driving enforcement campaigns, which scheme is further described below.

3. It was part of the scheme that beginning in or about 2009 and continuing until in or about 2012, after defendant TIMOTHY VEIT, as Project Manager, submitted Agreements on behalf of the Des Plaines Police Department to IDOT for which IDOT authorized a total of \$170,366 in STEP funds for impaired-driving enforcement, and after VEIT collected and reviewed accurate information regarding the number of citations, including DUI arrests, issued by Des Plaines police officers following each STEP enforcement campaign, VEIT then knowingly and intentionally inflated the number of DUI

arrests and stated false information regarding blood-alcohol content levels for the purported DUI arrests on Data Collection Forms submitted to IDOT.

4. It was further part of the scheme that for the FY2009 STEP grant, defendant TIMOTHY VEIT submitted to IDOT five Data Collection Forms for which VEIT falsely claimed a total of twenty-seven DUI arrests for STEP enforcement campaigns when, as VEIT knew, only thirteen DUI arrests had occurred.

5. It was further part of the scheme that for the FY2010 STEP grant, defendant TIMOTHY VEIT submitted to IDOT nine Data Collection Forms for which VEIT claimed a total of forty-seven DUI arrests for STEP enforcement campaigns when, as VEIT knew, only eight DUI arrests had occurred.

6. It was further part of the scheme that for the FY2011 STEP grant, defendant TIMOTHY VEIT submitted to IDOT eight Data Collection Forms for which VEIT claimed a total of sixty-two DUI arrests for STEP enforcement campaigns when, as VEIT knew, only eight DUI arrests had occurred.

7. It was further part of the scheme that for the FY2012 STEP grant, defendant TIMOTHY VEIT submitted to IDOT two Data Collection Forms for which VEIT claimed a total of sixteen DUI arrests for STEP enforcement campaigns when, as VEIT knew, only one DUI arrest had occurred.

8. It was further part of the scheme that, as a result of defendant TIMOTHY VEIT's falsification of material facts and his concealment of material facts regarding the DUI arrests performed during impaired-driving enforcement campaigns, VEIT caused the United

States Government through NHTSA to suffer losses in the amount of approximately \$132,893 in the form of reimbursement payments to the City of Des Plaines for impaired-driving enforcement campaigns.

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

In violation of Title 18, United States Code, Section 1001(a)(1).

UNITED STATES ATTORNEY