

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DOMINICK GIRONDA, and
JAMES SANSONE

No.

Violations: Title 18, United States Code,
Sections 1341 and 1346 and 2

UNDER SEAL

COUNT ONE

The SPECIAL APRIL 2024 GRAND JURY charges:

1. At times material to this indictment:

Relevant Individuals and Entities

a. The Metropolitan Pier and Exposition Authority (“MPEA”) was a municipal corporation created by the Illinois General Assembly. The MPEA operates McCormick Place Convention Center (“McCormick Place”) in Chicago, Illinois. The McCormick Place campus included multiple buildings, parking areas, and other spaces intended to host large conventions, tradeshow, and other events. The McCormick Place campus included more than a million square feet of exhibition space and thousands of parking spaces. The MPEA utilized venue management companies that assisted in the operation of McCormick Place.

b. Defendant DOMINICK GIRONDA was employed on behalf of MPEA to serve in a managerial role overseeing operations at McCormick Place Convention Center. As part of his employment, GIRONDA: (a) managed contracts with vendors providing services at McCormick Place, including vendors who provided

snow removal services on the McCormick Place grounds; (b) received and caused to be approved by MPEA invoices for snow removal services; and (c) caused MPEA to issue checks to vendors for snow removal services based on the invoices received.

c. Defendant JAMES SANSONE was an associate of GIRONDA.

d. Individual A was the President of Company A. Company A was incorporated in the State of Illinois. Company A provided construction, snow removal, and other related services. Individual A was a relative of SANSONE.

e. Individual B was the President of Company B. Company B was incorporated in the State of Illinois. Company B provided construction, snow removal, and other related services. At times, Individual B worked with Individual A and Company A on certain projects.

f. Individual C was an associate of GIRONDA and a relative of SANSONE.

Snow Removal Contracts and Invoices

g. On or about November 30, 2021, GIRONDA, serving as an agent for MPEA, signed a contract with Company A for emergency snow removal services, with an effective date of December 1, 2021. The contract provided that Company A would provide snow removal services at McCormick Place for a period of one year and allowed that the contract could be extended on behalf of MPEA for two additional one-year terms. Individual A signed the contract on behalf of Company A. The contract between MPEA and Company A listed SANSONE as an officer, director, or manager of Company A.

h. Company A provided snow removal services during the first one-year period of the contract. With approval from GIRONDA, who was acting on behalf of MPEA and McCormick Place, in or around December 2022, Company B took over the provision of snow removal services on the contract with MPEA for the two subsequent one-year periods, which spanned 2022 through 2024.

2. Beginning no later than in and around December 2022, and continuing until on or about May 14, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DOMINICK GIRONDA
and JAMES SANSONE,

defendants herein, together with others known and unknown to the Grand Jury, knowingly and with the intent to defraud, devised, and intended to devise, and participated in a scheme to defraud MPEA of money and property by means of materially false and fraudulent pretenses, representations, promises, and concealment of material facts, and of the intangible right to the honest services of GIRONDA through kickbacks, which scheme is further described below.

3. It was part of the scheme that: (a) GIRONDA and SANSONE caused Company B to submit falsified and inflated invoices to MPEA, which invoices GIRONDA approved and caused MPEA to make payments on; and (b) GIRONDA and SANSONE caused Individual B to kick back a portion of the MPEA payments received by Company B to GIRONDA and Individual C.

4. It was further part of the scheme that Individual C connected GIRONDA and SANSONE for the purpose of GIRONDA causing MPEA to contract with Company A, with which SANSONE was affiliated.

5. It was further part of the scheme that, in or around late 2022, GIRONDA and SANSONE met with Individual B, whose company, Company B, was taking over the snowplowing contract for McCormick Place from Company A, and instructed Individual B that: (a) SANSONE would be the intermediary between GIRONDA/MPEA and Company B; (b) SANSONE would direct Company B on how much to bill McCormick Place; and (c) Individual B would receive payments from the MPEA and pay GIRONDA and SANSONE from the funds received from the MPEA.

6. It was further part of the scheme that SANSONE emailed and texted information to Individual B on how to bill MPEA for snowplowing services.

7. It was further part of the scheme that SANSONE directed Individual B to include on the invoices to be submitted to MPEA by Company B thousands of dollars for snow removal services that were not actually provided by Company B, including compensation for individuals who had not worked on particular snow removal projects and for equipment that had not been utilized on particular snow removal projects.

8. It was further part of the scheme that GIRONDA caused MPEA to pay Company B the full amount listed on the fraudulent and inflated invoices and mail checks addressed to Company B to a post office box controlled by Individual B.

9. It was further part of the scheme that GIRONDA and SANSONE texted with Individual B about the kickback payments. As part of these text messages, GIRONDA used coded communications with Individual B when referring to the kickback payments, including referring to the kickback payments as bottles of “wine.”

10. It was further part of the scheme that GIRONDA and SANSONE directed Individual B to provide kickbacks from the payments by MPEA in the form of cash payments to SANSONE, who then passed on cash to GIRONDA and Individual C.

11. It was further part of the scheme that SANSONE and GIRONDA received kickback payments totaling approximately \$26,700.

12. It was further part of the scheme that the defendants concealed, misrepresented, and hid, and caused to be concealed, misrepresented, and hidden, the existence and purpose of the scheme and the acts done in furtherance of the scheme.

13. On or about February 3, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DOMINICK GIRONDA, and
JAMES SANSONE,

defendants herein, along with others known and unknown to the Grand Jury, for the purpose of executing the above-described scheme, knowingly caused to be delivered by the United States Mails, according to the direction thereon, an envelope addressed to a Post Office box in Tinley Park, Illinois, containing a check issued by the

Metropolitan Pier and Exposition Authority and made payable to Company B for
\$26,400;

In violation of Title 18, United States Code, Sections 1341, and 1346 and 2.

COUNT TWO

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. Paragraphs 1 through 12 of Count One of this Indictment are incorporated here.

2. On or about March 17, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DOMINICK GIRONDA, and
JAMES SANSONE,

defendants herein, along with others known and unknown to the Grand Jury, for the purpose of executing the above-described scheme to defraud, knowingly caused to be delivered by the United States Mails, according to the direction thereon, an envelope addressed to a Post Office box in Tinley Park, Illinois, containing a check issued by the Metropolitan Pier and Exposition Authority and made payable to Company B for \$22,040;

In violation of Title 18, United States Code, Sections 1341, and 1346 and 2.

COUNT THREE

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. Paragraphs 1 through 12 of Count One of this Indictment are incorporated here.

2. On or about February 2, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DOMINICK GIRONDA, and
JAMES SANSONE,

defendants herein, along with others known and unknown to the Grand Jury, for the purpose of executing the above-described scheme to defraud, knowingly caused to be delivered by the United States Mails, according to the direction thereon, an envelope addressed to a Post Office box in Tinley Park, Illinois, containing a check issued by the Metropolitan Pier and Exposition Authority and made payable to Company B for \$41,730;

In violation of Title 18, United States Code, Sections 1341, and 1346 and 2.

FORFEITURE ALLEGATION

The SPECIAL APRIL 2024 GRAND JURY alleges:

1. The allegations contained in 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 the violations of Title 18, United States Code, Sections 1341 and 1346 as alleged in Counts One through Three of this Indictment,

DOMINICK GIRONDA, and
JAMES SANSONE,

defendants herein, shall forfeit to the United States, pursuant to the Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all property constituting, and derived from, and traceable to, proceeds obtained directly or indirectly, as a result of the defendants' violations of Title 18, United States Code, Sections 1341 and 1346, including approximately at least \$26,700.

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

- 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 18, United States Code, Section 982(b)(1).

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

ACTING UNITED STATES ATTORNEY