

**FILED**  
11/16/2021

**LK**

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

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 KIMBERLY A. DYSON and )  
 IRVIN R. LUCAS, IV )

**1:21-CR-00705**  
No. **JUDGE BUCKLO**  
**MAGISTRATE JUDGE COLE**  
Violations: Title 18, United States  
Code, Sections 201(c) and 371

**COUNT ONE**

The SPECIAL MAY 2021 GRAND JURY charges:

1. At times material to this Indictment:

a. Defendant KIMBERLY A. DYSON was an employee of the United States Department of Veterans Affairs, and worked as a Prosthetic Clerk and a Purchasing Agent in the Veterans Health Administration Prosthetics Service at the Jesse Brown VA Medical Center (“JBVAMC”) in Chicago, Illinois. DYSON was a “public official” as defined in Title 18, United States Code, Section 201(a)(1).

b. The mission of the Veterans Health Administration Prosthetics Service was to provide comprehensive support to optimize the health and independence of veterans. The Prosthetics Service purchased equipment and services for veterans as part of the VA’s care and treatment of patients.

c. As part of her official duties, DYSON selected vendors from which to order equipment and services for VA patients, and she made payments to vendors for equipment and services using her government purchase card.

d. Defendant IRVIN R. LUCAS, IV was the owner of Company A, a medical supply company headquartered in Romeoville, Illinois.

2. Beginning in or around 2018, and continuing until in or around October 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIMBERLY A. DYSON and  
IRVIN R. LUCAS, IV,

defendants herein, did knowingly conspire to commit an offense against the United States, that is:

a. other than as provided by law for the proper discharge of official duty, to directly and indirectly give, offer, and promise payments from defendant IRVIN R. LUCAS, IV to defendant KIMBERLY A. DYSON, a public official, for and because of official acts performed and to be performed by DYSON, in violation of Title 18, United States Code, Section 201(c)(1)(A); and

b. other than as provided by law for the proper discharge of official duty, to directly and indirectly demand, seek, receive, accept, and agree to receive and accept payments personally to defendant KIMBERLY A. DYSON, a public official, from defendant IRVIN R. LUCAS, IV, for and because of official acts performed and to be performed by DYSON, in violation of Title 18, United States Code, Section 201(c)(1)(B).

Manner and Means by Which the Conspiracy Was Conducted

3. It was part of the conspiracy that defendants KIMBERLY A. DYSON and IRVIN R. LUCAS, IV agreed that LUCAS would make and did make payments

to DYSON in return for her issuing VA Prosthetics Service orders from the JBVAMC to purchase equipment and services from Company A.

4. It was further part of the conspiracy that defendant KIMBERLY A. DYSON issued VA Prosthetics Service orders from the JBVAMC to Company A and then sought payment from defendant IRVIN R. LUCAS, IV to DYSON, personally, for placing the orders.

5. It was further part of the conspiracy that defendant IRVIN R. LUCAS, IV made the payments to defendant KIMBERLY A. DYSON in return for her issuing VA Prosthetics Service orders from the JBVAMC to Company A by transferring money to DYSON's personal bank accounts and by adding money to debit card accounts to which DYSON had access.

6. It was further part of the conspiracy that, from approximately in or around 2018 through in or around October 2020, defendant KIMBERLY A. DYSON accepted at least approximately \$39,850 in payments from defendant IRVIN R. LUCAS, IV for issuing VA Prosthetics Service orders from the JBVAMC to Company A.

7. In furtherance of and to effect the objects of the conspiracy, defendants KIMBERLY A. DYSON and IRVIN R. LUCAS, IV misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the purposes and acts done in furtherance of the conspiracy.

Overt Acts

8. In furtherance of and to effect the objects of the conspiracy, defendants KIMBERLY A. DYSON and IRVIN R. LUCAS, IV committed the following overt acts, among others, in the Northern District of Illinois and elsewhere:

a. On or about January 31, 2020, DYSON sent LUCAS a text message requesting a \$1,300 payment from LUCAS for issuing approximately nine VA orders from the JBVAMC to Company A.

b. On or about February 4, 2020, LUCAS paid DYSON \$1,300 for approximately nine VA orders issued from the JBVAMC to Company A by transferring the money into DYSON's personal bank account.

c. On or about March 3, 2020, DYSON sent LUCAS a text message requesting a \$1,300 payment from LUCAS for issuing approximately four VA orders from the JBVAMC to Company A.

d. On or about March 5, 2020, LUCAS paid DYSON \$1,300 for issuing approximately four VA orders from the JBVAMC to Company A by transferring the money into DYSON's personal bank account.

e. On or about July 27, 2020, DYSON sent LUCAS a text message requesting an \$850 payment from LUCAS for issuing VA orders from the JBVAMC to Company A.

f. On or about July 28, 2020, LUCAS paid DYSON \$850 for issuing VA orders from the JBVAMC to Company A by transferring the funds to a debit card account to which DYSON had access.



g. On or about September 10, 2020, DYSON sent LUCAS a text message requesting a \$700 payment from LUCAS for issuing VA orders from the JBVAMC to Company A.

h. On or about September 11, 2020, LUCAS paid DYSON \$700 for issuing VA orders from the JBVAMC to Company A by transferring the funds to a debit card account to which DYSON had access;

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

The SPECIAL MAY 2021 GRAND JURY further charges:

1. Paragraph 1 of Count One of this Indictment is incorporated here.
2. On or about January 31, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIMBERLY A. DYSON,

defendant herein, being a public official, other than as provided by law for the proper discharge of official duty, did directly and indirectly demand, seek, and agree to receive and accept something of value personally, namely, a \$1,300 payment, from Irvin R. Lucas, IV, for and because of official acts performed and to be performed by DYSON, namely, the issuance of VA Prosthetics Service orders from the JBVAMC to purchase equipment and services from Company A;

In violation of Title 18, United States Code, Section 201(c)(1)(B).

**COUNT THREE**

The SPECIAL MAY 2021 GRAND JURY further charges:

1. Paragraph 1 of Count One of this Indictment is incorporated here.
2. On or about March 3, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIMBERLY A. DYSON,

defendant herein, being a public official, other than as provided by law for the proper discharge of official duty, did directly and indirectly demand, seek, and agree to receive and accept something of value personally, namely an approximately \$1,300 payment from Irvin R. Lucas, IV, for and because of official acts performed and to be performed by DYSON, namely, the issuance of VA Prosthetics Service orders from the JBVAMC to purchase equipment and services from Company A;

In violation of Title 18, United States Code, Section 201(c)(1)(B).

**COUNT FOUR**

The SPECIAL MAY 2021 GRAND JURY further charges:

1. Paragraph 1 of Count One of this Indictment is incorporated here.
2. On or about July 27, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIMBERLY A. DYSON,

defendant herein, being a public official, other than as provided by law for the proper discharge of official duty, did directly and indirectly demand, seek, and agree to receive and accept something of value personally, namely an approximately \$850 payment from Irvin R. Lucas, IV, for and because of official acts performed and to be performed by DYSON, namely, the issuance of VA Prosthetics Service orders from the JBVAMC to purchase equipment and services from Company A;

In violation of Title 18, United States Code, Section 201(c)(1)(B).



COUNT FIVE

The SPECIAL MAY 2021 GRAND JURY further charges:

1. Paragraph 1 of Count One of this Indictment is incorporated here.
2. On or about September 10, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KIMBERLY A. DYSON,

defendant herein, being a public official, other than as provided by law for the proper discharge of official duty, did directly and indirectly demand, seek, and agree to receive and accept something of value personally, namely an approximately \$700 payment from Irvin R. Lucas, IV, for and because of official acts performed and to be performed by DYSON, namely, the issuance of VA Prosthetics Service orders from the JBVAMC to purchase equipment and services from Company A;

In violation of Title 18, United States Code, Section 201(c)(1)(B).

**FORFEITURE ALLEGATION**

The SPECIAL MAY 2021 GRAND JURY further alleges:

1. Upon conviction of any offense in violation of Title 18, United States Code, Section 201, as set forth in Counts Two through Five of this Indictment, or conspiracy to commit such an offense, in violation of Title 18 United States Code, Section 371, as set forth in Count One of this Indictment, defendants KIMBERLY A. DYSON and IRVIN R. LUCAS, IV, 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), including but not limited to a criminal forfeiture money judgment.

2. If any of the property described above, as a result of any act or omission by a 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