PETITION FOR RICO INVESTIGATION INTO NY IL & PA DEPARTMENT OF MOTOR VEHICLES

October 16, 2025 Via US Mail

The Honorable Pam Bondi, Attorney General

U.S. Department of Justice

950 Pennsylvania Avenue, NW

Washington, DC 20530-0001

Re: THIS IS A REQUEST FOR AN FBI RICO INVESTIGATION INTO NEW YORK, ILLINOIS & PENNSYLVANIA STATE DEPARTMENTS OF MOTOR VEHICLES' PATTERN AND PRACTICE OF ISSUING COMMERCIAL DRIVER LICENSES (CDLs) TO ILLEGAL IMMIGRANTS, INCLUDING IN THE NAME OF "NO NAME GIVEN."

Dear Attorney General Bondi:

As you know, on August 18, 2025 and again on September 26, 2025, the SBTC wrote you (attached) requesting a Federal RICO investigation targeting California (CA) Department of Motor Vehicles (CA DMV) for racketeering and fraud against the Federal government with respect to its participation in the Federal CDL Funding Program overseen by the Federal Motor Carrier Safety Administration (FMCSA,) an Operating Administration of the United States Department of Transportation (USDOT) headed by Secretary Sean Duffy, copied here.

Secretary Duffy announced yesterday he is now withholding $40 million from California for willful non-compliance with CDL Program requirements[1].

Comes now, the SBTC to request a RICO investigation into NY, IL & PA Departments of Motor Vehicles on the same grounds. SBTC now alleges that these states' officials are knowingly and intentionally enabling the violation of 49 CFR 383.71(b)(9), which states:

(b) Initial Commercial Driver's License. Prior to obtaining a CDL, a person must meet all of the following requirements: (9) The person must provide proof of citizenship or lawful permanent residency as specified in Table 1 of this section, or be registered under paragraph (f) of this section.

[1] https://www.fmcsa.dot.gov/newsroom/trumps-transportation-secretary-sean-p-duffy-announces-consequences-californias-failure

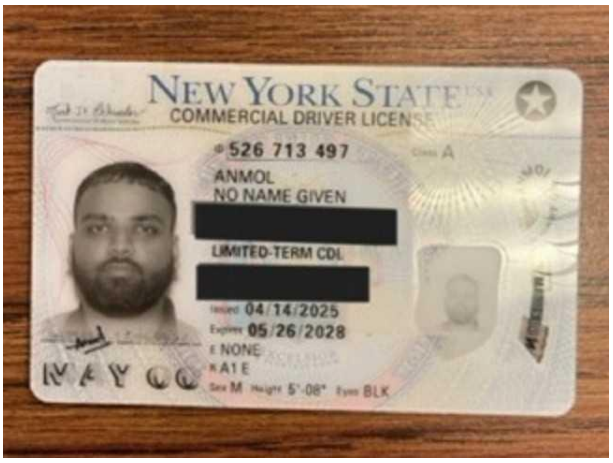
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Hon. Pam Bondi, Attorney General

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We again state we believe this matter is worthy of a RICO probe insofar as these states are, we believe, defrauding the Federal government each time they issue a CDL to an illegal immigrant, including, but not limited to, under the name **"NO NAME GIVEN,"** since these states have received federal funding under the CDL program. **We again suggest this appears to be in violation of 18 USC §1031 and/or 18 USC §371.**

A recent law enforcement blitz in Oklahoma discovered that an illegal immigrant driver from India was unlawfully issued a CDL by New York DMV in violation of CDL Program rules. Oklahoma Highway Patrol arrested 120 undocumented individuals, including 90 commercial truck drivers. Of these, 44 were in possession of CDLs issued by California, 14 were from New York, 12 were from Pennsylvania, and 11 were from Illinois.[2]



We suggest this is evidence of **organized criminal activity** in the form of defrauding the Federal government after filing certified assurances and accepting funding with respect to the Commercial Driver's License Program Implementation (CDLPI) grant.

On behalf of its 21,000 small business members, the nearly 4 million truckers who drive on our nation's highways, and the motoring public, SBTC requests the Department of Justice and the FBI please investigate New York, Illinois & Pennsylvania, which each qualify as an "enterprise" under Federal RICO statutes, and hold these state officials accountable under RICO. Like California, we believe these states are engaged in a scheme to defraud the US government, and the public; that each CDL issued to an illegal immigrant constitutes a **separate count of mail fraud** and is a predicate offense.

[2] SOURCE: https://www.koco.com/article/immigration-bust-oklahoma-ice-drivers-licenses-4-states-undocumented/68142252

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Hon. Pam Bondi, Attorney General

October 16, 2025

Sincerely,

/JAMES LAMB/, Executive Director

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