

# PETITION FOR RICO INVESTIGATION



August 18, 2025

Via US Mail

The Honorable Pam Bondi  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

**Re: THIS IS A PETITION FOR A RICO INVESTIGATION INTO CALIFORNIA  
DEPARTMENT OF MOTOR VEHICLES' PATTERN AND PRACTICE OF ISSUING  
COMMERCIAL DRIVER LICENSES (CDL) TO ILLEGAL IMMIGRANTS**

Dear Attorney General Bondi:

In the aftermath of the arrest in Florida of truck driver Harjinder Singh, who allegedly killed three people on the Florida Turnpike last week after making a reckless u-turn, and the press release issued Saturday night by Department of Highway Safety and Motor Vehicles (FLHSMV) revealing Mr. Singh is an illegal immigrant who was issued a CDL by the California Department of Motor Vehicles (DMV), comes now, the Small Business in Transportation Coalition (SBTC), representing 21,000+ independent truckers, motor carriers, and other small businesses in the transportation industry to request a RICO investigation targeting California DMV for racketeering and fraud against the Federal government.

It is SBTC's position that there is Federal criminal liability here in that California state 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.*

We believe this is worthy of a RICO probe as a matter of defrauding the Federal government each time the state issues a CDL to an illegal alien since the state gets federal funding under the CDL program. This would appear to be a violation of 18 U.S.C. § 1031 and/or 18 U.S.C. § 371.

1775 I. Street NW, Ste 1150, Washington, DC 20006 (202) 587-2751

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Requirements for state participation in the Federal CDL funding program are outlined in 49 USC § 31311 (“The State shall adopt and carry out a program for testing and ensuring the fitness of individuals to operate commercial motor vehicles consistent with the minimum standards prescribed by the Secretary of Transportation under section 31305(a) of this title”). We believe California has violated this statute by granting CDLs to illegal immigrants because Federal regulations codified at 49 CFR 383.71(b)(9) mandate proof of lawful status for CDLs to be issued by a state government.

On May 27, 2025, we filed the attached Petition for Decertification Order with Secretary Duffy, asking the Department of Transportation to decertify states not testing for English proficiency during CDL knowledge skills testing. California is one of those states.

As you know, on April 28, 2025, President Trump issued an Executive Order (EO) entitled “ENFORCING COMMONSENSE RULES OF THE ROAD FOR AMERICA’S TRUCK DRIVERS”, requiring truck drivers found not to be qualified to drive commercial motor vehicles by virtue of not being able to communicate proficiently in English pursuant to 49 CFR 391.11(b)(2) should be placed out-of-service (OOS).<sup>1</sup>

This EO was implemented by the Commercial Vehicle Safety Alliance (CVSA) pursuant to revised OOS criteria that took effect on June 25, 2025<sup>2</sup>.

Despite this, the media are reporting that the state of California is refusing to enforce the President’s EO<sup>3</sup>. This leads us to believe that the extent of racketeering and/or efforts to defraud the United States transcend the CA DMV, may warrant a DOJ pattern and practices investigation into the California Highway Patrol for failure to abide by an Executive Order which violates the civil rights of Americans, including the three killed last week if Mr. Singh is not proficient in English, and may very well be traced to the Governor of California himself.

As you know, Former Illinois Governor Ryan’s political career was rocked by a scandal called Operation Safe Road, which involved the illegal sale of government licenses, contracts, and leases by state employees during his prior service as Secretary of State. In the wake of numerous convictions of his former aides, he chose not to run for reelection in 2002. Seventy-nine former state officials, lobbyists, and others were charged in the investigation, and at least 75 were convicted.

The corruption scandal leading to Ryan’s downfall began with a federal investigation into a deadly crash in Wisconsin much like last week’s Singh triple fatality incident in Florida. In the former incident, six children from the Willis family of Chicago, Illinois, were killed and their parents, Rev. Duane and Janet Willis, were severely burned.

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<sup>1</sup> <https://www.whitehouse.gov/presidential-actions/2025/04/enforcing-commonsense-rules-of-the-road-for-americas-truck-drivers/>

<sup>2</sup> <https://cvsa.org/news/elp-oosc/>

<sup>3</sup> <https://www.overdriveonline.com/regulations/article/15751741/california-highway-patrol-not-enforcing-trumps-elp-mandate-for-truck-drivers>

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The investigation revealed a scheme inside Ryan's Secretary of State's office in which unqualified truck drivers obtained licenses through bribes.

In March 2003, Scott Fawell, Ryan's former chief of staff and campaign manager, was convicted on federal charges of racketeering and fraud. He was sentenced to six years and six months. The investigation finally reached the former governor, and in December 2003, Ryan and lobbyist Lawrence Warner were named in a 22-count federal indictment. The charges included racketeering, bribery, extortion, money laundering, and tax fraud. The indictment alleged that Ryan steered several state contracts to Warner and other friends; disbursed campaign funds to relatives and to pay personal expenses; and obstructed justice by attempting to end the state investigation of the license-for-bribes scandal. He was charged with lying to investigators and accepting cash, gifts and loans in return for his official actions as governor<sup>4</sup>.

SBTC believes the George Ryan case sets a precedent for DOJ prosecuting state officials over corrupt licensing that endangers lives. His bribes-for-licenses scandal caused fatalities. If CA DMV issued a CDL to undocumented immigrant Harjinder Singh in violation of 49 CFR 383.71(b)(9), thereby enabling, aiding and abetting his fatal crash, and these state officials do so regularly, it merits federal RICO scrutiny for defrauding USDOT in terms of receiving Federal CDL program funding.

Accordingly, the SBTC hereby respectfully requests the Department of Justice please open a criminal investigation into California officials' pattern and practice of illegally issuing CDLs to illegal immigrants and take whatever action the Department deems just and proper in the interest of public safety.

Thank you.

Sincerely,

/JAMES LAMB/, Executive Director

Small Business in Transportation Coalition, Inc.

(202) 587-2751 [James@Truckers.com](mailto:James@Truckers.com)

cc: Hon. Secretary Duffy, Steven G. Bradbury, Jessie Elison & Laurence Socci, Esq.

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[https://en.wikipedia.org/wiki/George\\_Ryan#:~:text=Six%20children%20from%20the%20Willis,drivers%20obtained%20licenses%20through%20bribes](https://en.wikipedia.org/wiki/George_Ryan#:~:text=Six%20children%20from%20the%20Willis,drivers%20obtained%20licenses%20through%20bribes)