

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
	)	Violations: Title 18,
v.	)	United States Code,
	)	Sections 922(d)(1) and 1951
ALI HALEEM	)	
	)	<u>INFORMATION</u>

COUNT ONE

The UNITED STATES ATTORNEY charges:

1. At times material to this information:
  - a. Defendant ALI HALEEM was an officer in the Chicago Police Department assigned to the 8th police district.
  - b. The Chicago Police Department required its officers to follow the Department's Rules and Regulations and General Orders.
  - c. Chicago Police Department Rule 4 prohibited officers from any conduct or action taken to use their official position for personal gain or influence.
  - d. Chicago Police Department Rule 45 prohibited officers from recommending any professional or commercial service.
  - e. Chicago Police Department Rule 46 prohibited officers from advising any person engaged in a professional or commercial service that such professional or commercial service may be needed.
  - f. Chicago Police Department Rule 48 prohibited officers from soliciting

or accepting any gratuity, or soliciting or accepting a gift, present, reward, or other thing of value for any service rendered as a Department member, or as a condition for the rendering of such service, or as a condition for not performing sworn duties.

g. Chicago Police Department General Order 98-08-01D stated that tows are provided by the Department of Streets and Sanitation or by Towing Company B, seven days a week, twenty-four hours a day.

h. Chicago Police Department General Order 98-08-01D required that officers notify the Chicago Police Department Office of Emergency Management and Communication to request a tow for any vehicle that should be towed.

i. Individual A was a tow truck driver and owner of Towing Company A, a towing business operating in the Chicago area. Unbeknownst to the defendant, Individual A was cooperating with law enforcement.

2. Beginning on or about March 13, 2008, and continuing through on or about March 20, 2008, at Chicago, in the Northern District of Illinois, Eastern Division,

ALI HALEEM,

defendant herein, did attempt to commit extortion, which extortion would have obstructed, delayed, and affected commerce, in that he attempted to obtain and obtained property, namely United States currency, from Individual A, with that person's consent induced under color of official right;

In violation of Title 18 United States Code, Section 1951.

COUNT TWO

The UNITED STATES ATTORNEY further charges:

On or about December 11, 2007, at Chicago, in the Northern District of Illinois,  
Eastern Division,

ALI HALEEM,

defendant herein, did knowingly sell and dispose of a firearm, namely, one Lorcin Model L32, .32 caliber semi-automatic pistol bearing serial number D19820, and one Raven Arms .25 caliber semi-automatic pistol bearing serial number 1033048, to Individual A knowing and having reasonable cause to believe that Individual A had been convicted of a crime punishable by a term of imprisonment exceeding one year;

In violation of Title 18, United States Code, Section 922(d).

COUNT THREE

The UNITED STATES ATTORNEY further charges:

On or about March 13, 2008, at Chicago, in the Northern District of Illinois,  
Eastern Division,

ALI HALEEM,

defendant herein, did knowingly sell and dispose of a firearm, namely, a Star Bonifacio Echeverria, 9 millimeter caliber semi-automatic pistol bearing serial number 1580629, to Individual A knowing and having reasonable cause to believe that Individual A had been convicted of a crime punishable by a term of imprisonment exceeding one year;

In violation of Title 18, United States Code, Section 922(d).

## **FORFEITURE ALLEGATION**

The UNITED STATES ATTORNEY further alleges:

1. The allegations in Counts 2 and 3 of this Information are incorporated here for the purpose of alleging that certain property is subject to forfeiture, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of his violation of Title 18, United States Code, Section 922(d), as alleged in the foregoing Information,

ALI HALEEM,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any and all right, title, and interest he may have in any property involved in the offense charged in the Information.

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) are:

- a. a Lorcin Model L32, .32 caliber semi-automatic pistol bearing serial number D19820, and associated ammunition;
- b. a Raven Arms .25 caliber semi-automatic pistol bearing serial number 1033048, and associated ammunition; and,
- c. a Star Bonifacio Echeverria, 9 millimeter caliber semi-automatic

pistol bearing serial number 1580629, and associated ammunition.

All pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28,  
United States Code, Section 2461(c).

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UNITED STATES ATTORNEY