

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA )  
 )  
 )  
 v. ) No.  
 ) Violations: Title 18, United States  
TODD J. FENDLER ) Code, Sections 1341 and 1343

**COUNT ONE**

The NOVEMBER 2015 GRAND JURY charges:

1. At times material to this indictment:
  - a. Surplus Market Solutions LLC was an entity located in Rockford, Illinois, operated and controlled by Todd J. Fendler and purporting to do business as Northern Illinois Agency.
  - b. Northern Underwriting Managers, Inc. was a corporation located in Rockford, Illinois, operated and controlled by Todd J. Fendler and doing business as Northern Illinois Insurance Agency.
  - c. Northern Illinois Insurance Billing Services was an entity located in Rockford, Illinois, operated and controlled by Todd J. Fendler.
  - d. Northern Illinois Insurance Agency, Inc., doing business as Northern Underwriting Managers, Inc. and as other entities, and Todd J. Fendler were licensed to conduct business in Illinois with the Illinois Department of Insurance.

2. Beginning at least as early as January 20, 2017, and continuing to on or about January 30, 2017, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

TODD J. FENDLER,

defendant herein, devised and intended to devise a scheme to defraud and to obtain money from entities and individuals who had previously obtained or had inquired about obtaining insurance policies through entities controlled and operated by the defendant by means of materially false and fraudulent pretenses, representations, and promises.

3. It was part of the scheme that the defendant would obtain information regarding their bank accounts from entities and individuals who had applied for an insurance policy or policies (“applicants”) with an entity controlled and operated by the defendant.

4. It was further a part of the scheme that the defendant, using the information regarding the bank accounts of the applicants, would create fictitious checks purportedly issued by the applicants and deposit those checks into a bank account of Surplus Market Solutions LLC that the defendant controlled.

5. It was further a part of the scheme that the defendant did not have permission or authority from the applicants to create the fictitious checks.

6. On or about January 24, 2017, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

TODD J. FENDLER,

defendant herein, for the purpose of executing the aforesaid scheme to defraud and to obtain money by materially false and fraudulent pretenses, representations, and promises, and attempting to do so, knowingly did cause to be transmitted by means of wire and radio communication in interstate commerce from Rockford, Illinois, to a location outside the State of Illinois, a signal regarding the deposit of a check in the amount of \$1,447 purportedly drawn upon a bank account of Hollywood Wax Museum Myrtle Beach LLC into an account controlled by the defendant at the Fifth Third Bank;

In violation of Title 18, United States Code, Section 1343.

**COUNT TWO**

The NOVEMBER 2015 GRAND JURY further charges:

1. Paragraphs 1 through 5 of Count One of this indictment are incorporated herein.
2. On or about January 30, 2017, at Roscoe, in the Northern District of Illinois, Western Division, and elsewhere,

TODD J. FENDLER,

defendant herein, for the purpose of executing the aforesaid scheme to defraud and to obtain money by materially false and fraudulent pretenses, representations, and promises, and attempting to do so, knowingly did cause to be sent and delivered by a commercial interstate carrier from Roscoe, Illinois, to the First National Bank and Trust Company in Beloit, Wisconsin, a check in the amount of \$5,205.79 purportedly drawn upon a bank account of Beer Haus, LLC;

In violation of Title 18, United States Code, Section 1341.

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY