



c. Company A store credit may be used to purchase merchandise and services from Company A. Company A store credit may be used at any Company A store location and online at Company A's website.

d. Company A store credit provided in non-receipted returns was electronically loaded onto a Company A gift card, which was a plastic card bearing a series of numbers and a barcode. A Company A gift card had no monetary value until a Company A employee scanned the gift card and loaded an amount of store credit onto the card by digitally transmitting information by wire from the store location within the Northern District of Illinois to a Company A datacenter in Austin, Texas. The datacenter in Austin, Texas then sent a return wire communication back to the Company A store location, activating the gift card and loading it with store credit equal to the refund amount.

e. Company A's policy required a customer conducting a non-receipted return to provide a form of photo identification, including a state identification card or a driver's license, to a Company A employee to conduct the transaction. Company A employees sometimes allowed customers to read their state identification number or state driver's license number to the employee to satisfy this identification requirement.

2. From in or about February 2008, and continuing through in or about September 2016, in the Northern District of Illinois, and elsewhere,

SALVATORE CRIBARI,  
also known as "Sal Fradillio,"

defendant herein, knowingly devised and participated in a scheme to defraud Company A and to obtain money and property belonging to Company A by means of materially false and fraudulent pretenses and representations and by concealment of material facts, which scheme is further described below.

3. It was part of the scheme that CRIBARI knowingly and intentionally stole merchandise from Company A stores located in the Northern District of Illinois, by concealing the merchandise on his person and in his clothing and removing the merchandise from the store without paying for it.

4. It was further part of the scheme that CRIBARI conducted non-receipted returns of merchandise he had stolen from Company A knowing that the merchandise was stolen. CRIBARI falsely and fraudulently presented the stolen merchandise to Company A employees as merchandise that legitimately had been purchased from Company A when, as CRIBARI well knew, the merchandise was stolen.

5. It was further part of the scheme that CRIBARI knowingly and intentionally provided false Illinois driver's license numbers and false Illinois state identification numbers to Company A employees in order to conduct non-receipted returns of merchandise CRIBARI had stolen from Company A.

6. It was further part of the scheme that CRIBARI used over a total of 1,300 unique Illinois driver's license numbers and state identification numbers to conduct non-receipted returns of stolen merchandise at Company A.

7. It was further part of the scheme that, in exchange for the non-receipted returns of stolen merchandise that CRIBARI conducted, CRIBARI received Company A store credit in the form of Company A gift cards. For each non-receipted return, CRIBARI received Company A store credit equal to the total retail price of the stolen merchandise he returned.

8. It was further part of the scheme that CRIBARI subsequently used the Company A gift cards he fraudulently obtained to buy various merchandise from Company A, including flooring, water heaters, appliances, and home organization units. Some of the merchandise CRIBARI purchased using the fraudulently-obtained gift cards was installed at properties in the Northern District of Illinois, including CRIBARI's home and a business CRIBARI operated.

9. It was further part of the scheme that CRIBARI used the Company A gift cards he fraudulently obtained to pay for installation, delivery, and other services relating to the merchandise CRIBARI purchased from Company A.

10. It was further part of the scheme that CRIBARI fraudulently obtained more than approximately \$340,000 in Company A gift cards, and CRIBARI used the fraudulently-obtained gift cards to purchase more than approximately \$310,000 in merchandise and services from Company A.

11. It was further part of the scheme that CRIBARI used the Company A gift cards he fraudulently obtained to buy personal utility trailers from Company A.

CRIBARI then sold some of these personal utility trailers to individual purchasers for money.

12. On or about August 7, 2016, at Chicago, Illinois, in the Northern District of Illinois, and elsewhere,

SALVATORE CRIBARI,  
also known as “Sal Fradillio,”

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted, by means of wire communication in interstate commerce, between Chicago, Illinois and a Company A datacenter in Austin, Texas, certain signs and signals, namely a refund of approximately \$429.06 in the form of Company A store credit placed on a Company A gift card;

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

**COUNT TWO**

The NOVEMBER 2015 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One of this indictment are incorporated here.

2. On or about June 2, 2016, at Crystal Lake, Illinois, in the Northern District of Illinois, and elsewhere,

SALVATORE CRIBARI,  
also known as "Sal Fradillio,"

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted, by means of wire communication in interstate commerce, between Crystal Lake, Illinois and a Company A datacenter in Austin, Texas, certain signs and signals, namely a refund of approximately \$342.41 in the form of Company A store credit placed on a Company A gift card;

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

**COUNT THREE**

The NOVEMBER 2015 GRAND JURY further charges:

3. Paragraphs 1 through 11 of Count One of this indictment are incorporated here.

4. On or about April 11, 2016, at Algonquin, Illinois, in the Northern District of Illinois, and elsewhere,

SALVATORE CRIBARI,  
also known as "Sal Fradillio,"

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted, by means of wire communication in interstate commerce, between Algonquin, Illinois and a Company A datacenter in Austin, Texas, certain signs and signals, namely a refund of approximately \$218.99 in the form of Company A store credit placed on a Company A gift card;

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

## **COUNT FOUR**

The NOVEMBER 2015 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One of this indictment are incorporated here.

2. On or about February 5, 2016, at Naperville, Illinois, in the Northern District of Illinois, and elsewhere,

SALVATORE CRIBARI,  
also known as "Sal Fradillio,"

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted, by means of wire communication in interstate commerce, between Naperville, Illinois and a Company A datacenter in Austin, Texas, certain signs and signals, namely a refund of approximately \$364.94 in the form of Company A store credit placed on a Company A gift card;

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



**COUNT FIVE**

The NOVEMBER 2015 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One of this indictment are incorporated here.

2. On or about January 28, 2016, at McHenry, Illinois, in the Northern District of Illinois, and elsewhere,

SALVATORE CRIBARI,  
also known as "Sal Fradillio,"

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted, by means of wire communication in interstate commerce, between McHenry, Illinois and a Company A datacenter in Austin, Texas, certain signs and signals, namely a refund of approximately \$296.51 in the form of Company A store credit placed on a Company A gift card;

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

## COUNT SIX

The NOVEMBER 2015 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One of this indictment are incorporated here.

2. On or about January 2, 2015, at Glenview, Illinois, in the Northern District of Illinois, and elsewhere,

SALVATORE CRIBARI,  
also known as "Sal Fradillio,"

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted, by means of wire communication in interstate commerce, between Glenview, Illinois and a Company A datacenter in Austin, Texas, certain signs and signals, namely a refund of approximately \$430.61 in the form of Company A store credit placed on a Company A gift card;

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

**COUNT SEVEN**

The NOVEMBER 2015 GRAND JURY further charges:

3. Paragraphs 1 through 11 of Count One of this indictment are incorporated here.

4. On or about September 3, 2014, at Darien, Illinois, in the Northern District of Illinois, and elsewhere,

SALVATORE CRIBARI,  
also known as "Sal Fradillio,"

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted, by means of wire communication in interstate commerce, between Darien, Illinois and a Company A datacenter in Austin, Texas, certain signs and signals, namely a refund of approximately \$426.75 in the form of Company A store credit placed on a Company A gift card;

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

## COUNT EIGHT

The NOVEMBER 2015 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One of this indictment are incorporated here.

2. On or about September 12, 2013, at Orland Park, Illinois, in the Northern District of Illinois, and elsewhere,

SALVATORE CRIBARI,  
also known as "Sal Fradillio,"

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted, by means of wire communication in interstate commerce, between Orland Park, Illinois and a Company A datacenter in Austin, Texas, certain signs and signals, namely a refund of approximately \$270.41 in the form of Company A store credit placed on a Company A gift card;

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

## COUNT NINE

The NOVEMBER 2015 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One of this indictment are incorporated here.

2. On or about August 17, 2012, at Volo, Illinois, in the Northern District of Illinois, and elsewhere,

SALVATORE CRIBARI,  
also known as "Sal Fradillio,"

defendant herein, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted, by means of wire communication in interstate commerce, between Volo, Illinois and a Company A datacenter in Austin, Texas, certain signs and signals, namely a refund of approximately \$292.22 in the form of Company A store credit placed on a Company A gift card;

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

## FORFEITURE ALLEGATION

The NOVEMBER 2015 GRAND JURY alleges:

1. The allegations of Counts One through Nine of this indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. As a result of his violations of Title 18, United States Code, Section 1343, as alleged in this indictment,

SALVATORE CRIBARI,  
also known as "Sal Fradillio,"

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all right, title, and interest he may have in any property, real and personal, that constitutes and is derived, directly and indirectly, from proceeds traceable to the commission of the offense, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

3. The interests of defendant subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), include but are not limited to the following property: unredeemed Company A gift cards, personal utility trailers, flooring, water heaters, appliances, home organization units, and other merchandise and materials purchased using Company A gift cards.

4. If any of the forfeitable property described above, as a result of any act or omission by the defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. 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 under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c);

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY