Case: 1:24-cr-00550 Document #: 25 Filed: 01/27/25 Pagle 24 of 309 550 ID #:174



JudgeManish S. Shah Magistrate Judge Laura K. McNally Category 3

THOMAS G. BRUTON CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JAWAD FAKROUNE

also known as "Angelino Escobar," and "Anjelino Escobar"

No. 24 CR 550

Violations: Title 18, United States Code, Sections 894(a)(1) and (a)(2) and 1073

COUNT ONE

The SPECIAL NOVEMBER 2023 GRAND JURY charges:

Between on or about November 5, 2024, and on or about November 26, 2024, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAWAD FAKROUNE also known as "Angelino Escobar," and "Anjelino Escobar,"

defendant herein, did knowingly participate in the use of extortionate means within the meaning of Section 891(7) of Title 18, United States Code, to collect an extension of credit, within the meaning of Section 891(1) of Title 18, United States Code, in that FAKROUNE used extortionate means, namely, the express and implicit threat of the use of violence, to collect and attempt to collect from Victim A an extension of credit arising from two loans from FAKROUNE to Victim A totaling approximately \$405,000;

In violation of Title 18, United States Code, Section 894(a)(1).

COUNT TWO

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about November 25, 2024, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAWAD FAKROUNE also known as "Angelino Escobar," and "Anjelino Escobar,"

defendant herein, did knowingly participate in the use of extortionate means within the meaning of Section 891(7) of Title 18, United States Code, to punish any person for the nonrepayment of an attempt to collect an extension of credit, within the meaning of Section 891(1) of Title 18, United States Code; that is, defendant FAKROUNE did kick, slap, and choke Victim A in order to punish Victim A for the nonrepayment of an extension of credit arising from two loans from FAKROUNE to Victim A totaling approximately \$405,000;

In violation of Title 18, United States Code, Section 894(a)(2).

COUNT THREE

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

Between on or about December 18, 2024, and on or about January 18, 2025, in

the Northern District of Illinois, Eastern Division, and elsewhere,

JAWAD FAKROUNE

also known as

"Angelino Escobar," and "Anjelino Escobar,"

defendant herein, did knowingly travel across state boundaries with the intent to

avoid prosecution by the United States Government for a crime that is a felony under

federal law, namely, the use of extortionate means to attempt to collect an extension

of credit and the use of extortionate means to punish any person for the

nonrepayment of an extension of credit as charged in Case No. 24 CR 550 (N.D. Ill.);

In violation of Title 18, United States Code, Section 1073.

A TRUE BILL:

FOREPERSON

Signed by Jason Yonan on behalf of the ACTING UNITED STATES ATTORNEY

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