

FILED

12/2/2024

**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" or "Anjelino Escobar"

CASE NUMBER: 24CR550

UNDER SEAL

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

From on or about November 12, 2024, to on or about November 26, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant violated:

Code Section

Offense Description

Title 18, United States Code, Section 894(a)(1)

did knowingly participate in any way in the use of any extortionate means to collect or attempt to collect any extension of credit

Title 18, United States Code, Section 894(a)(2)

did knowingly participate in any way in the use of any extortionate means to punish any person for the nonrepayment thereof.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

Jennifer Avila

JENNIFER AVILA

Special Agent, Federal Bureau of Investigation (FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: December 2, 2024

Sheila Finnegan

Judge's signature

City and state: Chicago, Illinois

SHEILA M. FINNEGAN, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, JENNIFER AVILA, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed for approximately nine years. My current responsibilities include the investigation of public corruption offenses and other criminal violations of federal laws, including violent crime and financial offenses.

2. This affidavit is submitted in support of a criminal complaint alleging that JAWAD FAKROUNE, also known as “Angelino Escobar” or “Anjelino Escobar,” has violated Title 18, United States Code, Sections 894(a)(1) and (a)(2). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging FAKROUNE with using extortionate means to collect or attempt to collect extensions of credit and the punishment of a person for nonrepayment of extensions of credit, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offenses alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, interviews of witnesses, my own observations and actions, my experience and training, the experience of other agents, information from confidential sources, consensually recorded

communications, surveillance footage, and records obtained during the course of the investigation.

I. FACTS SUPPORTING PROBABLE CAUSE

A. Summary of Probable Cause

4. In summary, and as described further below, on or about November 25, 2024, JAWAD FAKROUNE threatened, assaulted, and battered a confidential source (“CS-1”)¹ to collect or attempt to collect and to punish CS-1 for nonrepayment over a purported debt that FAKROUNE claimed that CS-1 owed him.

5. According to CS-1, in or around the spring of 2023 and the spring of 2024, FAKROUNE, whom CS-1 knows as “Angelino Escobar” or “Anjelino Escobar,” loaned CS-1 approximately \$405,000, via two loans, for a restaurant that CS-1 was opening in Chicago. According to CS-1, s/he has repaid FAKROUNE approximately \$160,000 to date through a series of check and cash payments.

6. According to CS-1 and corroborated by consensually recorded phone calls, in or around November 2024, CS-1 and FAKROUNE engaged in disputes

¹ The FBI initially approached CS-1 on or about October 25, 2024, but did not have a substantive conversation with CS-1 until October 31, 2024. CS-1 has cooperated with the FBI since November 5, 2024. CS-1 is voluntarily cooperating with the FBI to address historical threats and violence by FAKROUNE. To date, CS-1 has not been paid by the FBI, but (1) the FBI purchased a cell phone and finances the data plan associated with a cell phone that CS-1 has used to communicate with FAKROUNE; and (2) the FBI paid for hotel lodging for CS-1 after CS-1 was threatened by FAKROUNE. CS-1 has a prior conviction for DUI. CS-1 has informed law enforcement that s/he consumes alcohol nearly every night. Some of CS-1’s reports to law enforcement have conflicted with each other, including initially denying receiving any loans from FAKROUNE. However, information received from CS-1 and recited in this affidavit has been corroborated, in part by recorded phone calls, surveillance footage, and records related to FAKROUNE’s lending of money to CS-1.

regarding the amount CS-1 owed FAKROUNE.² These disputes culminated the evening of November 25, 2024. At approximately 10:08 p.m., FAKROUNE arrived at one of CS-1's restaurants ("Restaurant 1") to confront CS-1. According to Restaurant 1 surveillance footage and an audio recording of the incident, as further detailed below, FAKROUNE arrived at Restaurant 1, threatened CS-1 over the manner and nature of CS-1's payments to FAKROUNE, and claimed that CS-1 owed FAKROUNE \$1.5 million. FAKROUNE then stalked CS-1 around the restaurant and choked, kicked, and punched CS-1, repeatedly demanding that CS-1 pay FAKROUNE the purported debt. FAKROUNE threatened CS-1's life and the lives of CS-1's former spouse and children if CS-1 did not pay FAKROUNE in a manner consistent with his demands. CS-1 repeatedly asked FAKROUNE to stop during the incident. FAKROUNE left Restaurant 1 approximately twenty minutes after he arrived.

7. On or about November 26, 2024, CS-1 had a consensually recorded call with FAKROUNE, during which call CS-1 asked FAKROUNE why FAKROUNE

² This affidavit does not describe every communication between FAKROUNE and CS-1. My descriptions of certain recorded communications are summaries of the communications and may not include the entire communications. Where recorded conversations are discussed in this affidavit, the language that is quoted from the recorded conversations is based upon a preliminary review of the recorded conversations and not on final transcripts of the recorded conversations. Summaries and excerpts do not include all statements or topics discussed during the course of the recorded conversations, nor do quotes summarized in succession necessarily reflect all statements made between quotes. Any times listed for communications are approximate. At various points in the affidavit, I have included, either in brackets or summary form, my interpretation of words and phrases used in the recorded communications. My interpretations are based on the contents and context of the recorded communications, events occurring before and after the communications, my knowledge of the investigation as a whole, information received from confidential sources or cooperative witnesses, my experience and training, and the experience of other law enforcement agents in this investigation.

had beat him/her the night before. FAKROUNE responded “why? I want my money.”

B. Background of FAKROUNE and FAKROUNE’s Use of Pseudonyms

8. According to United States immigration records, FAKROUNE is a Moroccan national who entered the United States from Morocco by way of New York, New York on or about September 17, 2001. FAKROUNE entered the United States on a visa as part of the Diversity Visa Program. FAKROUNE’s status later changed to lawful permanent resident.

9. According to New York Department of Correction (“NYDOC”) records, in or around 2007 and 2008, FAKROUNE was arrested, charged, and convicted of several crimes under the pseudonym “Fouel Ban Abdrahime,” including identity theft, grand larceny, criminal possession of stolen property, and bribery of a public servant. FAKROUNE was sentenced to a term of imprisonment of 4 to 12 years in the NYDOC, and was released on or about March 22, 2012.

10. According to United States immigration records, upon his release from prison, FAKROUNE was paroled to United States immigration authorities. In or around September 2012, an immigration judge ordered FAKROUNE removed from the United States. On or about December 4, 2012, an immigration judge granted FAKROUNE a withholding of removal.

11. According to NYDOC records, FAKROUNE was last seen by NYDOC on or about May 16, 2013, and last communicated with New York law enforcement

on or about May 24, 2013. According to NYDOC, NYDOC considers FAKROUNE to be an absconder.

12. Based on the following information, law enforcement officials understand that, since he lost contact with New York law enforcement in or around May 2013, FAKROUNE has used multiple aliases, including “Angelino Escobar.” Specifically, law enforcement officials understand that, beginning at least in or around January 2018, and continuing through the present, FAKROUNE has used the name “Angelino Escobar,” committing identity theft by utilizing a social security number assigned to another individual and a fraudulent New York license in the name of “Angelino Escobar.” According to bank and lease records, FAKROUNE has utilized the stolen social security number and fraudulent license to open bank accounts and execute lease agreements in the name of “Angelino Escobar.”

13. Law enforcement officials understand that FAKROUNE has adopted the name “Angelino Escobar” based on photograph identifications,³ tattoos, and common family information regarding FAKROUNE’s mother and sister. Specifically:

a. I have reviewed surveillance footage depicting interactions between CS-1 and the person whom s/he knows as “Escobar,” and I have identified that person as FAKROUNE based on a comparison to United States immigration,

³ One witness, whom law enforcement officials understand has a business and/or personal relationship with FAKROUNE, was shown a photograph of FAKROUNE and was not able to identify him as someone whom he knew. That witness also denied knowing anyone by the name of “Angelino Escobar” and having any dealings, personal or financial, with anyone by that name.

New York Police Department (“NYPD”), and NYDOC records depicting FAKROUNE.

b. CS-1 identified an image of FAKROUNE accessing a Bank of America ATM in or around August 2023 as the individual s/he knows as “Escobar.”

c. A cooperating witness (“CW-1”) informed law enforcement officials that s/he knows FAKROUNE as “Angelino Escobar” or “Angelo Escobar.” CW-1 identified an image of FAKROUNE accessing a Bank of America ATM in or around August 2023 as the individual whom s/he knows as “Escobar.”

d. Spouse 1, further described below, identified an image of FAKROUNE in NYPD records as FAKROUNE.

e. In or around February 2024, Bank of America provided ATM photographs of an individual believed to be FAKROUNE accessing an ATM. Law enforcement provided these images to the New York Police Department’s (“NYPD”) Facial Recognition Unit. In or around March 2024, the NYPD Facial Recognition Unit returned a possible match for “Foued Ban Abdrhime” (as set forth above, FAKROUNE).

f. According to NYDOC records, “Ban Abdrhime” had a tattoo on his right hand of a heart with the word “Halima.” According to Citibank ATM photographs from on or about March 2, 2024, FAKROUNE has a tattoo consistent in size, location, and appearance with the tattoo depicted in the NYDOC records.

g. According to United States immigration records and NYDOC records, FAKROUNE identified his mother’s name as “Halima.”

h. According to NYDOC records, “Ban Abdrahime” was married to Spouse 1 during a portion of his incarceration.

i. According to witnesses who knew FAKROUNE as “Angelino Escobar,” FAKROUNE has a tattoo of a woman’s face on his chest. Under the image of the woman’s face is the name of Spouse 1. CW-1 provided a photograph of FAKROUNE’s chest tattoo to law enforcement.

j. On or about September 26, 2024, law enforcement interviewed Spouse 1. According to Spouse 1:

i. S/he met FAKROUNE in or around 2004-2005 and first knew him as “Anthony.” Spouse 1 and FAKROUNE stayed in contact until FAKROUNE’s arrest in or around 2007, at which point, according to Spouse 1, s/he learned that FAKROUNE’s real name was FAKROUNE and that FAKROUNE had been arrested under the alias of “Foued Ban Abdrahime.”

ii. FAKROUNE asked Spouse 1 to marry him during his incarceration. Spouse 1 and FAKROUNE were married in the NYDOC on or about October 17, 2011. Spouse 1 confirmed that s/he had seen FAKROUNE’s chest tattoo during a visit. Spouse 1 stated that FAKROUNE was from Morocco and that Spouse 1 had sent money to his family in Morocco on one or two occasions. Spouse 1 filed for divorce on or about January 25, 2013.

k. According to witnesses who knew FAKROUNE as “Angelino Escobar,” including CS-1, FAKROUNE introduced them to a woman named “Hanane,” whom he claimed was his stepsister.

l. According to United States immigration records, FAKROUNE identified a sister named “Hanane Fakroune.”

m. According to U.S. Customs and Border Patrol records, Hanane Fakroune entered the United States in or around August 2023, and August 2024, and listed an intended United States address in Chicago in immigration paperwork on both occasions.

n. According to CS-1, a woman who identified herself as Hanane told CS-1 that FAKROUNE, whom CS-1 knew as “Escobar,” was her brother and from Morocco.

o. According to CW-1, who knew FAKROUNE as “Escobar,” FAKROUNE asked CW-1 to travel to Morocco with Hanane, which s/he did, by way of France. According to flight records, CW-1 and Hanane were on the same outbound flight from Chicago to Paris, France on or about August 27, 2023.

C. CS-1’s Purported Debt to FAKROUNE and Repayments

14. According to CS-1:

a. CS-1 is a restaurateur who owns and operates several restaurants in Chicagoland. CS-1 was introduced to FAKROUNE in or around the spring of 2021 through another Chicago-based restaurateur. At the time, CS-1 was working for another restaurateur but wanted to operate his/her own restaurants and understood that FAKROUNE might be able to assist CS-1’s restaurant business.

b. In or around March 2023, CS-1 was pursuing opening a new restaurant in the Lincoln Park neighborhood of Chicago (“Restaurant 2”). CS-1 needed additional capital for the buildout of a new restaurant and for obtaining a liquor license. At the time, CS-1 was unable to obtain a liquor license until s/he paid back taxes to the Illinois Department of Revenue.

c. CS-1 and FAKROUNE were involved in multiple business ventures since being introduced. In or around the spring of 2023 and the spring of 2024, FAKROUNE provided CS-1 with two loans, one for approximately \$285,000 (“Loan 1”), and another for approximately \$120,000 (“Loan 2”). FAKROUNE provided both loans in cash.

d. CS-1 understands that the principal for Loan 2 was provided by FAKROUNE and another individual in the food industry (“Individual A”).⁴

e. CS-1 used the funds from Loan 1 to pay various costs associated with the buildout of Restaurant 2, including construction costs, furniture purchases, and the installation of audio and visual equipment. CS-1 also used the funds from Loan 2 to pay back taxes to the Illinois Department of Revenue, so that CS-1 could obtain a liquor license.

⁴ According to historical call records from AT&T and bank records from Capital One and Marquette Bank associated with accounts controlled by FAKROUNE, FAKROUNE and Individual A, using Individual A Phone, have communicated over the phone and have exchanged money since in or around 2023. Law enforcement officials identified Individual A as the user of Individual A Phone based on records provided by AT&T. In addition, according to Capital One records, an account opened in FAKROUNE’s pseudonym, “Angelino Escobar,” was used to purchase a \$50,000 cashier’s check payable to Individual A on or about February 22, 2024. On this same date, according to Marquette Bank records, an account opened in FAKROUNE’s pseudonym issued a check for \$20,000 to Individual A.

f. In or around the spring of 2024, FAKROUNE directed CS-1 to pay him \$4,000 every week to satisfy the outstanding balance for Loan 2. To date, according to CS-1, CS-1 has paid FAKROUNE approximately \$128,000 through a series of check and cash payments. CS-1 has maintained a ledger tracking these payments, which s/he provided to law enforcement. CS-1 has made these payments either directly to FAKROUNE or to FAKROUNE's associates, including one of FAKROUNE's assistants ("Individual B").

g. In or around the spring of 2024, CS-1 requested that a promissory note be executed between CS-1 and FAKROUNE, reflecting CS-1's repayment obligations regarding Loan 1. CS-1's attorney provided a copy of the promissory note to law enforcement. According to the promissory note, dated May 2, 2024, and signed by CS-1 and FAKROUNE, using a pseudonym of "Anjelino Escobar," CS-1 promised to pay FAKROUNE \$400,000 by way of \$9,500 monthly payments for 42 months.

D. Disputes Over Debt

15. In or around August and September 2024, law enforcement interviewed CW-1, who is one of CS-1's assistants and who routinely socializes with CS-1. According to CW-1, CW-1 learned from CS-1 that FAKROUNE had been demanding money from CS-1.

16. On or about October 25, 2024, law enforcement interviewed CS-1. Between on or about October 25, 2024, and November 5, 2024, CS-1 met with or

spoke over the phone with law enforcement officials several times to discuss FAKROUNE.

17. On or about November 4, 2024, CS-1 provided verbal and written consent for law enforcement to record a phone conversation between CS-1 and FAKROUNE. At approximately 11:00 a.m., FAKROUNE, using phone number XXX-XXX-4359 (“FAKROUNE Phone 1”),⁵ called CS-1, and then transferred the call to a FaceTime video call. During the call, FAKROUNE directed CS-1 to obtain a new telephone.⁶

18. During the November 4, 2024 recorded call, CS-1 and FAKROUNE discussed CS-1’s restaurant business and repaying Loan 2. Based on law enforcement officials’ review of the recording, during the conversation, FAKROUNE and CS-1 had the following exchange:

FAKROUNE: You’re running the house. I’m just with you in the house. I’m behind you but I don’t run the house.

.....

CS-1: That money that you give me for [Loan 2], has been paid in full. So now I’m just paying interest only. I’ve given you \$124,000.

FAKROUNE: Are you sure?

⁵ Law enforcement officials identified FAKROUNE as the user of FAKROUNE Phone 1 based on the following: first, both CS-1 and CS-1’s attorney identified FAKROUNE as the user of FAKROUNE Phone 1; and second, law enforcement officials later listened to recorded calls over FAKROUNE Phone 1 and identified FAKROUNE as the user of FAKROUNE Phone 1 based on their familiarity with FAKROUNE’s voice based on a recorded interaction between FAKROUNE and Chicago Police Department officers from April 22, 2024, as well as recorded calls between FAKROUNE and financial institutions.

⁶ As discussed above, the FBI purchased CS-1 a new cellular telephone and is financing the data plan associated with this phone.

CS-1: 100%. And I will send you a text . . . That money you give me has been paid in full. I give you \$4,000 a week in cash every week. It's been \$124,000 paid back. I don't know what is, how much [Individual A] wants, or you guys want for interest. And if you can give me a break because I can't take cash out of the bank account right now.

. . . .

CS-1: You want me to call and talk to him?

FAKROUNE: If you want.

CS-1: If you can send me his info, I'll go talk to him. You know, and I'll be like, can you give me a break because I can't keep giving you \$4,000 a week for this guy, like maybe \$1,000 a week or something. I cannot take money.

FAKROUNE: That's now how it goes, bro.

. . . .

CS-1: If we are going to do this deal for [Restaurant 1], where will you get the money from? Is that the same [Individual A]? And it's going to be the same aggressive payment?

FAKROUNE: I will get my own shit.

CS-1: Huh?

FAKROUNE: I will get it my own. I will deal with my own things. Don't worry about it, I will figure it out my way.

. . . .

CS-1: That [Loan 2] thing is paid in full.

FAKROUNE: Brother, that's not how it works, brother.

CS-1: How it works then? He got paid his money back.

FAKROUNE: That's not how it fucking works. Because you can't just take money from the guy . . .

CS-1: What's the interest amount and how much? . . . Okay, every penny, he's gotten back. I need to know how much I am going to keep giving these people. It never ends, man.

FAKROUNE: I trust you. You're the one taking it. We take the money from him.

CS-1: What's the interest? 20, 30%? It never ends. What is it?

19. Based on my training and experience and knowledge of the investigation, I believe that in the above exchange: (a) FAKROUNE and CS-1 discussed Loan 2, and CS-1 represented that he/she had paid FAKROUNE back the full principal of the loan and interest; and (b) FAKROUNE told CS-1 that s/he would continue to make payments on the loan despite CS-1 informed that there was no amount due.

20. On or about November 12, 2024, CS-1 and FAKROUNE exchanged a series of telephone calls, all involving FAKROUNE Phone 1, and all of which were recorded. According to the recordings, during the conversations, FAKROUNE and CS-1 had the following exchanges:

CS-1: I can no longer take any cash from the bank.

FAKROUNE: Please don't. Please don't.

CS-1: If anything needs to be given, I will give it to you in a check. Who do I give the check to?

FAKROUNE: Please do not even . . . Excuse me . . . Please don't ever in your life give me cash. You know what? You behind cash. You behind money. You owe me money. You owe me a a deep shit of money. . . .I hope you understand. I am not a little chihuahua to be eaten.

. . . .

FAKROUNE: You just want to run your mouth my friend. That's not what you want to do. It's not the time for you to fuck around with me and this is not the time right now. What you gotta do for me is very simple. Give me my money.

CS-1: I'm trying . . .

FAKROUNE: Give me my check and get my money.

CS-1: I'm working on it.

. . . .

FAKROUNE: You playing very serious games and you think I'm one of the fucking guys. I am not one of them. And I keep telling you, please don't do that. And I'm telling you, and I've told you, please, please, please, please. I've been a very patient and I've been very gentleman with you and I've don't everything legit with you. I've commit no crime with you. I've done no crime with you . . . What I want from you my friend, get that fucking check. I will send you the fucking address. Send the fucking check . . . Get that fucking check. Please, make sure you get my fucking money. Please, I'm begging you. Please, do not play that game with me. I'm tired of it.

. . . .

FAKROUNE: I am going to tell you what's going to happen. It's very simple. Get me my fucking money [sic] what I'm supposed to be paid. I've been waiting for you but you're smart by yourself. Give me my money. You not want to be smart.

. . . .

FAKROUNE: Hey, you're running bullshit stories. That's what you do. And I'm telling you, I'm tired. I'm done. Just make sure I have it. Enjoy your day. Do not piss me off. Take that from me, man. My patience with you is done. Get my money.

. . . .

FAKROUNE: And I've been watching from far away. I've been watching everything.

CS-1: What does that even mean?

FAKROUNE: I mean, I am watching every single thing. Every single thing. You think, listen. Even if I die tomorrow, somebody else will collect my money. Even when I die, somebody else will be collecting my money. Somebody else collects my money. There's nothing for free. There's no free lunch.

CS-1: I understand. All I am asking you . . .

FAKROUNE: What I am asking you, you do not know me. You know the kindness of me. Please. I am trying to be very kind with you.
.....

FAKROUNE: I give you that money. I give that money.

CS-1: And you got money from me. A lot.
.....

FAKROUNE: I am telling you, man, if I don't get my fucking money . . . and I will deal with you and I will not forgive you, man. I give you money like water . . . Give me my mother fucking money, man.

CS-1: I have. Okay, I have. So, when does this end?

FAKROUNE: Get the fucking money. Give it to me . . .

CS-1: You have to be patient. Okay?

FAKROUNE: Just pay me every month that I've been patient! Pay me every month.

CS-1: I don't have the money in the account right now.
.....

FAKROUNE: Give me my money from [Restaurant 2]. Give me my money you owe me. You don't want to give me my money?

CS-1: I have, I have.

FAKROUNE: Hey. It's up to you how you want to play this quick . . . I don't give a fuck how gotta do it, but you gotta pay me every month. I am not waiting for you and I am not playing with you.
.....

FAKROUNE: I do not think you take me serious.

CS-1: You've got to stop with this tough talk.

FAKROUNE: I'm not tough, I'll tell you one thing. I'll be tough with you through my actions then you'll understand a different Angelino. Now, if you think you're living a nightmare, you get to live in my nightmare.

....

FAKROUNE: Do not be my enemy.

E. FAKROUNE Batters CS-1 Over Debt and Threatens to Kill CS-1 and CS-1's Family

21. At law enforcement officials' direction, on or about November 21, 2024, at approximately 12:00 p.m., CS-1 sent an iMessage to phone number XXX-XXX-1178 ("FAKROUNE Phone 2").⁷⁸ In the iMessage, CS-1 told FAKROUNE that s/he would give FAKROUNE "a check for 8 k today" if FAKROUNE could provide a company name to which the check would be addressed.

22. According to CS-1, on or about November 22, 2024, FAKROUNE called an employee of CS-1 and asked to speak with CS-1. S/he then spoke with FAKROUNE who demanded to pick up his check.⁹ CS-1 again asked FAKROUNE for a company name for addressing the check.

23. On or about November 25, 2024, at approximately 3:22 p.m., CS-1 spoke with FAKROUNE, using FAKROUNE Phone 2. The call was recorded. In

⁷ The FBI has preserved this iMessage.

⁸ Law enforcement officials identified FAKROUNE as the user of FAKROUNE Phone 2 based on the following: first, CS-1 identified FAKROUNE as the user of FAKROUNE Phone 2; and second, law enforcement officials later listened to recorded calls over FAKROUNE Phone 2 and identified FAKROUNE as the user of FAKROUNE Phone 2 based on their familiarity with FAKROUNE's voice.

⁹ This phone call was not recorded because FAKROUNE did not call the phone provided to CS-1 by the FBI, but rather, called an employee of CS-1 who subsequently handed that phone to CS-1.

summary, FAKROUNE provided a company name for the check and told CS-1 to provide the check to Individual B. During this conversation, FAKROUNE also said “I come for you later tonight.”

24. CS-1 wrote FAKROUNE an \$8,000 check, which was addressed to the company that FAKROUNE had identified for the check, and included “Anjelino Escobar payments for Lincoln 40K pay so far” in the memo line of the check. CS-1 provided a photograph of the check to law enforcement officials. According to Restaurant 1 surveillance footage, Individual B arrived at Restaurant 1 at approximately 3:34 p.m., and CS-1 delivered the check to Individual B.

25. On or about November 26, 2024, law enforcement interviewed Individual C. According to Individual C:

a. S/he received the check from Individual B on November 25, 2024. Individual C met FAKROUNE in the evening of November 25, 2024, during which s/he told FAKROUNE that CS-1 had written FAKROUNE’s pseudonym on the check.

b. FAKROUNE stated that CS-1 was trying to be “slick.” Individual C left FAKROUNE at approximately 10:00 p.m.

26. At approximately 10:04 p.m. on or about November 25, 2024, FAKROUNE, using FAKROUNE Phone 2, called CS-1 and asked whether CS-1 was at Restaurant 1. CS-1 told FAKROUNE that he was at Restaurant 1. This call was recorded.

27. According to Restaurant 1 surveillance footage, at approximately 10:08 p.m., FAKROUNE arrived at Restaurant 1.

28. According to Restaurant 1 surveillance footage and a separate audio recording that CS-1 captured,¹⁰ FAKROUNE confronted CS-1 over CS-1's purported debt to FAKROUNE.¹¹ Restaurant 1 surveillance footage depicts the following:

a. FAKROUNE followed CS-1 around the restaurant and was gesticulating animatedly.

b. At approximately 10:11 p.m., CS-1 removed CS-1's shirt at FAKROUNE's demand to show FAKROUNE that he was not wearing a recording device. However, as discussed above, CS-1 was able to obtain an audio recording of the interaction using a separate device provided by law enforcement officials.

c. At approximately 10:12 p.m., FAKROUNE grabbed CS-1 by the neck, choked CS-1, and pushed CS-1 up against a brick pillar in Restaurant 1.

d. At approximately 10:16 p.m., FAKROUNE kicked CS-1 in the leg and then punched CS-1 in the right side of CS-1's face. CS-1 held the right side of his/her face in pain.

29. According to an audio recording of the confrontation and in summary, throughout FAKROUNE's and CS-1's interaction, FAKROUNE repeatedly demanded money from CS-1. Among other things, FAKROUNE repeatedly

¹⁰ Law enforcement officials had previously given CS-1 an audio recording device separate from the phone to record interactions with FAKROUNE.

¹¹ I have reviewed the surveillance footage depicting this incident between CS-1 and the person he knows as "Escobar," and I have identified that person as FAKROUNE based on witness interviews and a comparison to United States immigration, NYPD, and NYDOC records.

demanded that CS-1 “get me all my money.” At various points of the confrontation, FAKROUNE also claimed that he gave CS-1 half a million dollars for Restaurant 2, that CS-1 stole over a million dollars from FAKROUNE, and that CS-1 had stolen over \$1.5 million from FAKROUNE. FAKROUNE told CS-1 that “\$1.5 million belong to me” and demanded that CS-1 bring him that money.

30. According to an audio recording of the confrontation and in summary, FAKROUNE also repeatedly threatened CS-1 and CS-1’s family, and CS-1 begged for FAKROUNE to stop the beating and threats. Specifically:

a. Among other things and in summary, FAKROUNE told CS-1 he was going to “bury” CS-1, that CS-1’s life was “nothing” and “useless,” and that wherever CS-1 was in Chicago, CS-1’s “body is on the line.” FAKROUNE also told CS-1 that he would kill CS-1 and CS-1’s kids, and that he would murder CS-1. FAKROUNE further said that he was “going to murder [CS-1]. And I’m going to fuck your wife, and your childrens, and everyone in your life.” FAKROUNE told CS-1 that no one would protect CS-1. FAKROUNE told CS-1 that he would murder CS-1’s “bitch,” and that if “I don’t get my money, I will cut your balls. I hope you understand.” FAKROUNE again told CS-1 that he would murder CS-1 “before they get me” and that FAKROUNE would hunt CS-1 down “every day, every night.” FAKROUNE also told CS-1 that he would murder CS-1’s family and that, if CS-1 did not come up with money, “tomorrow, people will look for you.”

b. Throughout FAKROUNE's and CS-1's interaction, CS-1 repeatedly pleaded with FAKROUNE to stop and disputed the amount of money that CS-1 owed FAKROUNE.

31. In addition, according to employees of CS-1 and CS-1's restaurant manager, two employees observed FAKROUNE enter Restaurant 1 and one employee overheard FAKROUNE threaten CS-1.¹²

32. According to Restaurant 1 surveillance footage, FAKROUNE departed Restaurant 1 at approximately 10:28 p.m.

F. FAKROUNE's Confirmation that Beating of CS-1 was Over Debt

33. On or about November 26, 2024, at approximately 4:55 p.m., CS-1 and FAKROUNE, using FAKROUNE Phone 2, exchanged a series of iMessages that included the following:

FAKROUNE: "Just give me my fuckingoney"

FAKROUNE: "Amy fucking money"

CS-1: "Pick you check I don't wave to talk to you anymore"

FAKROUNE: "My fucking money."

CS-1: "Is at [Restaurant 1]"

FAKROUNE: "I want all my money."¹³

34. According to a recorded phone call on or about November 26, 2024, at approximately 1:38 p.m., CS-1 spoke with FAKROUNE, using FAKROUNE Phone

¹² As set forth above, these employees know FAKROUNE as "Angelino Escobar."

¹³ CS-1 provided screenshots of these messages to the FBI.

2. During the conversation and according to the recording, FAKROUNE and CS-1 had the following exchanges:

FAKROUNE: You're playing very dangerous games.

CS-1: I am not, I am not.

FAKROUNE: You do not know nothing, my friend. I am telling you, you are playing very dangerous games.
.....

CS-1: Every week, I

FAKROUNE: Every week you give me four thousand dollars.
.....

CS-1: My record says [Individual A] payment.

FAKROUNE: I don't know who [Individual A] you're talking about. I never met no [Individual A].
.....

FAKROUNE: And do me a favor, before you pay anybody else, make you sure you get my money, make sure you give me my fucking money. Get me my fucking cash and make sure you get all my money and make sure you do it.
.....

FAKROUNE: I give you the money my friend. I give you \$125,000 dollar for \$155,000 dollar. You pay me four thousand dollar a week for that long. You pay me four thousand. There's nobody else you pay.

CS-1: Yes, sir.
.....

FAKROUNE: I will not forgive you. Just give me my motherfucking money.
.....

FAKROUNE: You took \$1.5 million dollars from me.

CS-1: That's not true.

FAKROUNE: Well, we'll find out the hard way, my friend.

....

FAKROUNE: I bet you gotta give me my money. And you will give it to me. I promise you that . . . \$1.5 million . . .

CS-1: That is not true, that is not true . . . You have the note for [Restaurant 2].

FAKROUNE: I will show you a note when I'm gonna fucking smash your skull in the bottom of the fucking water. You've messed around with the wrong man . . .

CS-1: . . . Listen, stop threatening me.

FAKROUNE: I want my money.

....

FAKROUNE: All my money you, you got in cash. Everything you done is cash. All my money you take from me is cash. You never, I never give you no check. All my money is cash, cash, cash. Give me cash back.

....

FAKROUNE: If you think you're not going to give me my money, you're so stupid. If you think you want to play that dangerous game with me. Please, don't try me with a good time.

35. According to a recorded phone call on or about November 26, 2024, at approximately 4:46 p.m., CS-1 spoke with FAKROUNE, using FAKROUNE Phone

2. During the conversation, FAKROUNE and CS-1 had the following exchanges:

CS-1: I got a check for you, I wasn't able to get the cash. I got a check with no name or anything, just have somebody pick it at [Restaurant 1] at any time you want.

....

FAKROUNE: Not to me, just the company? Explain to me please, what do you mean just the company.

CS-1: Like I put Anjelino Escobar in the note at the bottom and that was not doable so I put 613 North Wells and that's it.
.....

CS-1: Bro, you fucking beat me twice last night man. We were fucking brothers. What would you do that? We've been in business for three years. Tell me why would you do that to me, man?

FAKROUNE: Why you rob me, man?

CS-1: I didn't rob you. I've always been a friend and I always give you money.
.....

FAKROUNE: You're not my friend, you're trying to fuck me.
.....

FAKROUNE: Face me, face me. If you think you will take my money and you'll be fine, then you stupid.
.....

CS-1: You fucking attacked me twice last night for no fucking reason. For no fucking reason.

FAKROUNE: That was nothing. If I don't get my money then you find out the hard way.

CS-1: I did already last night.

FAKROUNE: Don't get it twisted, bro. That was nothing.
.....

CS-1: You pulled a fucking . . . Listen, bro . . . You pulled a gun on me fucking twice in our relationship and you beat me last night. I don't know why, I've always fucking worked my ass off for you.
.....

FAKROUNE: Why you stole my money.

CS-1: I didn't stole your money.
.....

CS-1: I don't deserve to be treated like I was treated last night.

FAKROUNE: I will find you, man.

....

FAKROUNE: You will never enjoy your family, man.

CS-1: Yeah, I got you. You already threatened me 70,000 times. You beat me the shit out of it.

....

FAKROUNE: Where are you right now?

CS-1: . . . I'm asking you to stop. Your fucking check is ready to be picked up. I don't fucking ever want to see you in my fucking life. You threaten my life, you beat the shit out of me, fuck it.

FAKROUNE: Oh man, that's nothing. Get me all my money.

....

FAKROUNE: Listen, everything you have is mine. Everything you have.

36. According to a recorded phone call on or about November 26, 2024, at approximately 5:02 p.m., CS-1 spoke with FAKROUNE, using FAKROUNE Phone 2. During the conversation and according to the recording, CS-1 asked FAKROUNE "why would you beat me last night?" FAKROUNE responded "why? I want my money."

37. According to Restaurant 1 surveillance footage, on or about November 26, 2024, at approximately 5:13 p.m., Individual B arrived at Restaurant 1 to pick up the check that CS-1 and FAKROUNE had discussed earlier in the day. CS-1's restaurant manager provided the check to Individual B and then spoke to FAKROUNE on Individual B's phone over FaceTime. According to CS-1's

restaurant manager, FAKROUNE said, in summary, that CS-1 was “playing dangerous games.”

II. CONCLUSION

38. Based on the foregoing, I respectfully submit that there is probable cause to believe that, between on or about November 12, 2024 through on or about November 26, 2024, JAWAD FAKROUNE did knowingly participate in any way in the use of any extortionate means (1) to collect or attempt to collect any extension of credit, and (2) to punish any person for the nonrepayment thereof, in violation of Title 18, United States Code, Sections 894(a)(1) and (a)(2).

FURTHER AFFIANT SAYETH NOT.

Jennifer Avila

JENNIFER AVILA

Special Agent, Federal Bureau of
Investigation

SWORN TO AND AFFIRMED by telephone December 2, 2024.

Sheila Finnegan

Honorable SHEILA M. FINNEGAN
United States Magistrate Judge