

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JORDAN ROMAN

Violation: Title 18, United States Code,
Section 1343

The UNITED STATES ATTORNEY charges:

1. At times material to this Information:

a. Defendant JORDAN ROMAN operated Drumstick Timpani Fund L.P., a limited partnership organized in the state of Illinois.

b. ROMAN solicited and received funds from investors through Drumstick Timpani Fund L.P.

c. Victim A was an individual residing in Libertyville, Illinois.
2. Beginning in or around December 2012, and continuing through in or around December 2024, in the Northern District of Illinois, Eastern Division, and elsewhere,

JORDAN ROMAN,

defendant herein, knowingly devised, intended to devise, and participated in a scheme to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below.

3. It was part of the scheme that ROMAN fraudulently solicited and obtained approximately \$500,000 from Victim A through Drumstick Timpani Fund L.P. as an investment based on false representations about the intended use of the investment, and the performance and value of the investment.

4. It was further part of the scheme that ROMAN falsely told Victim A that he would invest Victim A's money on his behalf, when ROMAN knew that he would use some of Victim A's money for his own personal use.

5. It was further part of the scheme that ROMAN used some of Victim A's investment funds for ROMAN's own personal use, such as to pay his utility and credit card bills.

6. It was further part of the scheme that after receiving Victim A's funds, ROMAN falsely told Victim A that Victim A's investment was profitable, when ROMAN knew that the value of Victim A's investment had decreased due to trading losses and ROMAN's misappropriation of Victim A's funds.

7. It was further part of the scheme that, in order to conceal his misappropriation of Victim A's funds, ROMAN created false documentation, including account statements and tax forms, that falsely represented to Victim A that the value of Victim A's investment was greater than the investment was actually worth.

8. It was further part of the scheme that ROMAN misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the existence, purpose, and acts done in furtherance of the scheme.

9. As a result of the scheme, ROMAN fraudulently misappropriated approximately \$500,000 from Victim A.

10. On or about March 24, 2023, in the Northern District of Illinois, Eastern Division, and elsewhere,

JORDAN ROMAN,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an email that traveled interstate to Victim A that falsely represented the value of Victim A's investment;

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

JASON
YONAN

Digitally signed by
JASON YONAN
Date: 2025.05.28
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Signed by Jason A. Yonan on behalf of the
UNITED STATES ATTORNEY