1:25-cr-00512
Judge Thomas M. Durkin
Magistrate Judge Jeffrey T. Gilbert
RANDOM/CAT.3

FILED
8/26/2025
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA v. JAWAD FAKROUNE, also known as "Angelino Escobar," "Anjelino Escobar," "Angelo Escobar," "Giovanni Escobar," and "Angelo Baldini"	No. Violations: Title 18, United States Code, Section 1343, and Title 26, United States Code, Sections 7201 and 7203

COUNT ONE

The SPECIAL MAY 2024 GRAND JURY charges:

1. At times material to this indictment:

The Internal Revenue Service

a. The Internal Revenue Service ("IRS") was part of the United States Department of the Treasury and, among other things, was responsible for administering the tax laws of the United States and collecting taxes from individuals and entities.

b. Individual taxpayers were required to file an annual United States Individual Tax Return, Form 1040, including schedules and attachments, with the Internal Revenue Service by a date certain, if the individual's gross income exceeded certain specified amounts. If a taxpayer failed to accurately report or pay his or her tax liability, the IRS could calculate, assess, and attempt to collect the correct tax liability.

Defendant JAWAD FAKROUNE

c. Defendant JAWAD FAKROUNE was 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. On or about March 25, 2002, FAKROUNE filed a United States Individual Tax Return, Form 1040 for the 2001 tax year.

d. FAKROUNE's status later changed to lawful permanent resident. 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.

e. In or around 2007 or 2008, FAKROUNE began using pseudonyms. Beginning no later than in or around 2018, FAKROUNE began using, among others, the pseudonyms "Angelino Escobar," "Anjelino Escobar," "Angelo Escobar," "Giovanni Escobar," and "Angelo Baldini," which names were not associated with any legitimate Social Security number in FAKROUNE's name.

f. Between in or around 2020 and in or around December 2024, FAKROUNE was a resident of the Northern District of Illinois.

2. FAKROUNE failed to file a Form 1040 individual income tax return for the calendar year 2020 on or before May 17, 2021.

3. On or about January 1, 2020, and continuing through on or about May 17, 2021, in the Northern District of Illinois, Eastern Division,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

defendant herein, did willfully attempt to evade and defeat the federal income tax due and owing by him to the United States for the calendar year 2020, by committing the following affirmative acts, among others:

a. During calendar year 2020, FAKROUNE directed a $200,000 wire transfer from Individual A to Individual B as payment for credit card debt FAKROUNE had accumulated; and

b. During calendar year 2020, FAKROUNE directed a $600,000 wire transfer from Individual A to Company A as payment for rent for FAKROUNE's residence in New York; and

c. During calendar year 2020, FAKROUNE caused the purchase of vehicles for Individual B and Individual C; and

d. During calendar year 2020, FAKROUNE directed a $5,000 wire transfer from Individual A to Individual C.

In violation of Title 26, United States Code, Section 7201.

COUNT TWO

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about May 17, 2021, in the Northern District of Illinois, Eastern Division,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

defendant herein, a resident of the Northern District of Illinois, having received gross income in excess of the amount required to file an income tax return and thereby being required by law to file an income tax return (Form 1040 with schedules and attachments) following the close of calendar year 2020 and on or before May 17, 2021, willfully failed to make and file such return at the time required by law;

In violation of Title 26, United States Code, Section 7203.

COUNT THREE

The SPECIAL MAY 2024 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are incorporated here.

2. FAKROUNE failed to file a Form 1040 individual income tax return for the calendar year 2021 on or before April 18, 2022.

3. Between on or about January 1, 2021, and continuing through on or about April 18, 2022, in the Northern District of Illinois, Eastern Division,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

defendant herein, did willfully attempt to evade and defeat the federal income tax due and owing by him to the United States for the calendar year 2021, by committing the following affirmative acts, among others:

a. During calendar year 2021, FAKROUNE converted for personal use at least approximately $100,000 in cash; and

b. During calendar year 2021, FAKROUNE obtained approximately $420,000 through the sale of vehicles, which proceeds FAKROUNE directed through a bank account associated with Individual D.

In violation of Title 26, United States Code, Section 7201.

COUNT FOUR

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about April 18, 2022, in the Northern District of Illinois, Eastern Division,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

defendant herein, a resident of the Northern District of Illinois, having received gross income in excess of the amount required to file an income tax return and thereby being required by law to file an income tax return (Form 1040 with schedules and attachments) following the close of calendar year 2021 and on or before April 18, 2022, willfully failed to make and file such return at the time required by law;

In violation of Title 26, United States Code, Section 7203.

COUNT FIVE

The SPECIAL MAY 2024 GRAND JURY further charges:

1. Beginning no later than in or around 2022, and continuing through in or around October 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

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

2. It was part of the scheme that FAKROUNE fraudulently obtained approximately $2,450,000 from Individual E through false representations and promises that FAKROUNE would invest the money on Individual E's behalf in shipping containers and a marijuana grow operation.

3. It was further part of the scheme that, in order to obtain and retain funds from Individual E, FAKROUNE falsely represented and promised to Individual E that Individual E would receive a monthly return on his investment and could redeem his investment at any time.

4. It was further part of the scheme that FAKROUNE caused Individual E to transmit the $2,450,000 that FAKROUNE purportedly would invest on Individual E's behalf to a bank account in the name of Individual F.

5. It was further part of the scheme that FAKROUNE falsely represented and promised that he was investing the money that Individual E transmitted to Individual F for a business involving shipping containers and a marijuana grow operation, when, in fact, FAKROUNE used nearly all of Individual E's money for FAKROUNE's personal purposes, including among other things, the purchase of a residence in Lemont, Illinois for the benefit of FAKROUNE, to pay rent for a residence in New York for the benefit of FAKROUNE, to fund restaurant outings and shopping at designer stores in New York City, to purchase a 2022 Cadillac Escalade for the benefit of Individual G, and to purchase designer watches for various individuals.

6. It was further part of the scheme that FAKROUNE misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the purposes of and acts done in furtherance of the scheme.

7. On or about July 29, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of a wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate wire transfer processed through the Federal Reserve System in the amount of approximately $1,000,000 from a bank account at City National Bank ending in 0111 associated with Individual E to a Bank of America account ending in 4203 associated with Individual F;

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

COUNT SIX

The SPECIAL MAY 2024 GRAND JURY further charges:

1. Paragraphs 1 through 6 of Count Five are incorporated here.

2. On or about August 2, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of a wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate wire transfer processed through the Federal Reserve System in the amount of approximately $1,450,000 from a bank account at City National Bank ending in 0111 associated with Individual E to a Bank of America account ending in 4203 associated with Individual F;

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

COUNT SEVEN

The SPECIAL MAY 2024 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are incorporated here.

2. FAKROUNE failed to file a Form 1040 individual income tax return for the calendar year 2022 on or before April 18, 2023.

3. Between on or about January 1, 2022, and continuing through on or about April 18, 2023, in the Northern District of Illinois, Eastern Division,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

defendant herein, did willfully attempt to evade and defeat the federal income tax due and owing by him to the United States for the calendar year 2022, by committing the following affirmative acts, among others:

a. During calendar year 2022, FAKROUNE caused Individual E to wire approximately $1,000,000 to Individual F; and

b. During calendar year 2022, FAKROUNE caused Individual E to wire approximately $1,450,000 in funds Individual F.

In violation of Title 26, United States Code, Section 7201.

COUNT EIGHT

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about April 18, 2023, in the Northern District of Illinois, Eastern Division,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

defendant herein, a resident of the Northern District of Illinois, having received gross income in excess of the amount required to file an income tax return and thereby being required by law to file an income tax return (Form 1040 with schedules and attachments) following the close of calendar year 2022 and on or before April 18, 2023, willfully failed to make and file such return at the time required by law;

In violation of Title 26, United States Code, Section 7203.

COUNT NINE

The SPECIAL MAY 2024 GRAND JURY further charges:

1. Beginning no later than in or around 2023, and continuing through in or around January 2025, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

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

2. It was part of the scheme that FAKROUNE obtained approximately $150,000 from Individual H through false representations and promises that FAKROUNE would invest the money in a coffee shop and/or Mexican restaurant, when in fact, FAKROUNE did not invest the $150,000 in a coffee shop and/or Mexican restaurant.

3. It was further part of the scheme that, in order to obtain and retain funds from Individual H, FAKROUNE falsely represented and promised that Individual H would receive a 33% return on her investment within one year and could redeem her investment whenever she wanted.

4. It was further part of the scheme that FAKROUNE falsely represented to Individual H that Individual H was one of five sets of investors in a business that would be a coffee shop and/or Mexican restaurant and provided Individual H with a piece of paper falsely reflecting five separate silent investors in the coffee shop and/or Mexican restaurant.

5. It was further part of the scheme that, in order to obtain and retain money from Individual H, FAKROUNE falsely represented to Individual H that Individual D was an investor in the coffee shop and/or Mexican restaurant, when, in fact, Individual D did not invest in any coffee shop and/or Mexican restaurant with FAKROUNE.

6. It was further part of the scheme that FAKROUNE solicited $150,000 from Individual H for the purported investment in the coffee shop and/or Mexican restaurant, and when Individual H did not have sufficient funds to invest the full $150,000 and could only invest $75,000, FAKROUNE directed Individual H to bring in another person to invest to bring the total to $150,000. In response, Individual H brought in Individual I, who invested $75,000 based upon Individual H relaying FAKROUNE's false representations and promises that the funds would be invested in a coffee shop and/or Mexican restaurant.

7. It was further part of the scheme that FAKROUNE caused Individual H to provide him the $150,000 purported investment on behalf of Individual H and Individual I in cash.

8. It was further part of the scheme that FAKROUNE, in order to make the investment appear legitimate, falsely represented to Individual H that he was clearing Individual H's investment through Individual F, whom FAKROUNE falsely represented to be his attorney, but who in fact was FAKROUNE's personal associate.

9. It was further part of the scheme that, on or about January 6, 2025, FAKROUNE caused Individual H to sign a lease on behalf of FAKROUNE for a residence in Michigan City, Indiana, based upon FAKROUNE's false representations and promises that, in exchange for signing the lease, FAKROUNE would double Individual H's investment money and repay her $300,000 in connection with the coffee shop and/or Mexican restaurant investment. In fact, FAKROUNE did not repay any of the money Individual H and I provided to FAKROUNE.

10. It was further part of the scheme that FAKROUNE misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the purposes of and acts done in furtherance of the scheme.

11. On or about January 17, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of a wire communication in interstate commerce certain writings, signs, and signals, namely, electronic communications relating to the cash withdrawal in the amount of $160 from an Associated Bank account ending in 3308 associated with Individual H, which communications were processed by Associated Bank data centers located outside of Illinois;

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

COUNT TEN

The SPECIAL MAY 2024 GRAND JURY further charges:

1. Paragraphs 1 through 10 of Count Nine are incorporated here.

2. On or about May 1, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of a wire communication in interstate commerce certain writings, signs, and signals, namely, electronic communications relating to the cash withdrawal in the amount of $500 from an Associated Bank account ending in 3308 associated with Individual H, which communications were processed by Associated Bank data centers located outside of Illinois.

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

COUNT ELEVEN

The SPECIAL MAY 2024 GRAND JURY further charges:

1. Beginning no later than in or around 2023, and continuing through in or around January 2025, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

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

2. It was part of the scheme that FAKROUNE obtained a total of approximately $91,000 from Individual J through false representations and promises that FAKROUNE would invest Individual J's money in the stock market, in a restaurant or bodega in New York, and in a purported "black market" business to sell goods, when in fact, FAKROUNE did not invest Individual J's money, but rather spent the money on personal items.

3. It was further part of the scheme that, in or about November 2023, in order to obtain money from Individual J, FAKROUNE falsely represented and promised Individual J that FAKROUNE would invest $30,000 of Individual J's money in the stock market along with FAKROUNE's own money.

4. It was further part of the scheme that, approximately one month after the purported stock market investment, in or around December 2023, FAKROUNE falsely represented to Individual J that the $30,000 Individual J had provided had made $1,000,000 and would make tens of millions of dollars in a few years, when in fact, FAKROUNE had not invested Individual J's money in the stock market, but rather spent the $30,000 on personal items.

5. It was further part of the scheme that, in order to obtain $31,000 from Individual J, FAKROUNE falsely represented and promised Individual J that he would invest $31,000 of Individual J's money in a bodega in New York City, when in fact, FAKROUNE did not invest Individual J's $31,000 in a bodega, but rather spent the $31,000 on personal items, including a luxury watch.

6. It was further part of the scheme that, in order to obtain $30,000 from Individual J, FAKROUNE made false representations and promises to Individual J that he would invest Individual J's $30,000 in the "black market" to sell other goods, along with FAKROUNE's own money, when in fact, FAKROUNE did not invest Individual J's $30,000, but rather spent the $30,000 on personal items.

7. It was further part of the scheme that FAKROUNE misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the purposes of and acts done in furtherance of the scheme.

8. On or about November 21, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of a wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate wire transfer processed through the Federal Reserve System in the amount of approximately $10,000 from a PNC Bank account ending in 7921 associated with Individual J to a Capital One bank account ending in 3949 associated with "Angelino Escobar";

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

COUNT TWELVE

The SPECIAL MAY 2024 GRAND JURY further charges:

1. Paragraphs 1 through 7 of Count Eleven are incorporated here.

2. On or about December 7, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of a wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate wire transfer processed through the Federal Reserve System in the amount of approximately $15,000 from a PNC Bank account ending in 7921 associated with Individual J to a Capital One bank account ending in 3949 associated with "Angelino Escobar";

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

COUNT THIRTEEN

The SPECIAL MAY 2024 GRAND JURY further charges:

1. Paragraphs 1 through 7 of Count Eleven are incorporated here.

2. On or about February 7, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

defendant herein, for the purpose of executing the scheme, knowingly caused to be transmitted by means of a wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate wire transfer processed through the Federal Reserve System in the amount of approximately $30,000 from a PNC Bank account ending in 1809 associated with Individual J to a Marquette Bank account ending in 4774 associated with "Angelino Escobar";

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

COUNT FOURTEEN

The SPECIAL MAY 2024 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are incorporated here.

2. FAKROUNE failed to file a Form 1040 individual income tax return for the calendar year 2023 on or before April 15, 2024.

3. Between on or about January 1, 2023, and continuing through on or about April 15, 2024, in the Northern District of Illinois, Eastern Division,

JAWAD FAKROUNE,
also known as “Angelino Escobar,”
“Anjelino Escobar,”
“Angelo Escobar,”
“Giovanni Escobar,” and
“Angelo Baldini,”

defendant herein, did willfully attempt to evade and defeat the federal income tax due and owing by him to the United States for the calendar year 2023, by committing the following affirmative acts, among others:

a. During calendar year 2023, FAKROUNE received approximately $150,000 in cash from Individual H; and

b. During calendar year 2023, FAKROUNE caused Individual J to wire transfer approximately $45,000 to a bank account associated with “Angelino Escobar.”

In violation of Title 26, United States Code, Section 7201.

COUNT FIFTEEN

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about April 18, 2024, in the Northern District of Illinois, Eastern Division,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

defendant herein, a resident of the Northern District of Illinois, having received gross income in excess of the amount required to file an income tax return and thereby being required by law to file an income tax return (Form 1040 with schedules and attachments) following the close of calendar year 2023 and on or before April 15, 2024, willfully failed to make and file such return at the time required by law;

In violation of Title 26, United States Code, Section 7203.

FORFEITURE ALLEGATION

The SPECIAL MAY 2024 GRAND JURY further alleges:

1. The allegations contained in Counts Five, Six, Nine, Ten, Eleven, Twelve, and Thirteen 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 the violations of Title 18, United States Code, Section 1343, as alleged in the foregoing indictment,

JAWAD FAKROUNE,
also known as "Angelino Escobar,"
"Anjelino Escobar,"
"Angelo Escobar,"
"Giovanni Escobar," and
"Angelo Baldini,"

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 in property, real and personal, which constitutes and is derived from proceeds traceable to the charged offenses.

3. The interests of the defendant subject to forfeiture 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) include, but are not limited to:

a. The homes, garages, and structures located at 16011, 16031, and 16055 135th Street, Lemont, Illinois, legally described as follows:

THE NORTH 500.00 FEET OF LOT 55, (EXCEPTING THEREFROM THE WEST 464 FEET AND ALSO EXCEPTING THEREFROM THE EAST 86 FEET) IN

COUNTY CLERK'S SUBDIVISION OF THE EAST 1/2 OF SECTION 6 AND

THE WEST 1/2 OF SECTION 5, TOWNSHIP 36 NORTH, RANGE 11 EAST OF THE THIRD PRINCIPAL MERIDIAN, IN WILL COUNTY, ILLINOIS

THE EAST 86 FEET OF THE NORTH 500 FEET LOT 55 IN COUNTY CLERK'S SUBDIVISION OF THE EAST 1/2 OF SECTION 6 AND THE WEST 1/2 OF SECTION 5, TOWNSHIP 36 NORTH, RANGE 11 EAST OF THE THIRD PRINCIPAL MERIDIAN, IN WILL COUNTY, ILLINOIS

THE EAST 220 FEET OF THE WEST 464 FEET OF THE NORTH 500 FEET OF LOT 55 IN COUNTY CLERK'S SUBDIVISION OF THE EAST 1/2 OF SECTION 6 AND THE WEST 1/2 OF SECTION 5, TOWNSHIP 36 NORTH, RANGE 11 EAST OF THE THIRD PRINCIPAL MERIDIAN, IN WILL COUNTY, ILLINOIS

THE WEST 464 FEET OF THE NORTH 500 FEET (EXCEPT THE EAST 220 FEET THEREOF) OF LOT 55 IN COUNTY CLERK'S SUBDIVISION OF THE EAST HALF OF SECTION 6 AND THE WEST HALF OF SECTION 5, IN TOWNSHIP 36 NORTH, RANGE 11, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN WILL COUNTY, ILLINOIS

b. At least approximately $2,691,000 in cash.

4. If any of the property described above, as a result of any act or omission by defendant: cannot be located upon the exercise of due diligence; has been transferred of sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture or substitute property, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

____
FOREPERSON

____
Signed by Sarah Streicker on behalf of
ANDREW S. BOUTROS
United States Attorney