

RECEIVED
4/13/2021 MO

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA
vs.
JOHN AMABILE

No. **1:21-CR-00227**

) Violation: Title 18, United
States Code, Section 1955

) **JUDGE PACOLD
MAGISTRATE JUDGE FUENTES**

The UNITED STATES ATTORNEY charges:

Beginning in or around October 2018 and continuing through in or around December 2019,
at Chicago, Elmwood Park, and Melrose Park, in the Northern District of Illinois, Eastern Division,
and elsewhere,

JOHN AMABILE,

defendant herein, together with others known and unknown, did knowingly conduct, manage, and
supervise all or part of an illegal gambling business, that is, a business involving sports
bookmaking, which business was in substantially continuous operation for a period in excess of
thirty days, which involved five or more persons who conducted, financed, managed, supervised,
directed and owned all or part of the business, and which was in violation of the following laws of
the State of Illinois: 720 Illinois Compiled Statutes, Sections 5/28-1(a)(2), (a)(5), (a)(11), and
(a)(12), and 5/28-1.1(b) and (d);

In violation of Title 18, United States Code, Section 1955.

FORFEITURE ALLEGATION

The UNITED STATES ATTORNEY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1955, as set forth in this information, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds which were obtained, directly and indirectly, from offenses committed in violation of Title 18, United States Code, Section 1955, as provided in Title 18, United States Code, Section 1955, and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a personal money judgment in the amount of \$100,000.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or 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 of substitute property, as provided in Title 21, United States Code Section 853(p).

Signed by Amarjeet S. Bhachu
on behalf of the
UNITED STATES ATTORNEY