

FILED
5/19/2022

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JAMES MILLS, also known as "Jamie
Montes,"
JOSEPH BROWN,
JULEY ELY,
GINGER ELY,
SYLVIA EVANS,
HOLLY STERGO, also known as "Holly
Stego,"
JESSICA VACA,
ANGELA BECHO,
FRANK COSTELLO,
JOE ROUGA,
MARY BACCO,
STEVE MONTEGA, also known as
"Fonzie Cerano,"
NIKO RISTICK,
TONY RISTICK, also known as
"Anthony Walker,"
RACHEL MONTEGA, also known as
"Samantha Walker,"
ROBERT CRAIG, also known as "Jake,"
STEVE VEGA, also known as "Cabby,"
SOPHIE BECHO,
MARK BLANCA,
DIANA LUMAS,
RICKY BLANCA, also known as "Fonz
Ristick,"
DAVID JENSEN, also known as "Tony,"
and
JOE JOHN

1:22-cr-00275

No. Judge Edmond E. Chang

Magistrate Judge Jeffrey Cole

Violations: Title 18, United States
Code, Sections 1341 and 1343

COUNT ONE

The SPECIAL JULY 2021 GRAND JURY charges:

1. At times material to this Indictment:

- a. Company A was a life insurance company incorporated in Iowa.
- b. Company B was a life insurance company incorporated in Ohio.
- c. Company C was a life insurance company incorporated in Ontario, Canada.
- d. Company D was a life insurance company incorporated in Texas.
- e. Company E was a life insurance company incorporated in Delaware.
- f. Company F was a life insurance company incorporated in Nebraska.
- g. Company G was a life insurance company incorporated in Michigan.
- h. Company H was a life insurance company incorporated in Michigan.
- i. Company I was a life insurance company incorporated in Nebraska.
- j. Company J was a life insurance company incorporated in Alabama.
- k. Life insurance companies, including Companies A through J, issued term life insurance policies for individuals located in Illinois and elsewhere, in which policies the companies agreed to pay a set amount as a death benefit to designated beneficiaries if the insured died during the policy's term.

l. Life insurance companies required applicants for term life insurance policies to provide truthful information, including information about the proposed insured's identity, employment, income, net worth, medical history, health status, and relationships to the designated beneficiary or beneficiaries, which information was material to the companies' decisions regarding issuing life insurance policies.

m. Life insurance companies required individuals submitting claims for death benefits under term life insurance policies to provide truthful information, including information regarding the identity of the decedent and the relationship of the claimant to the decedent, which information was material to the companies' decisions regarding claims for death benefits.

n. Illinois law required life insurance policies to include a provision making each policy incontestable after it had been in force for two years during the lifetime of the insured, except for nonpayment of premiums. Several other states had similar legal requirements.

o. Defendant JAMES MILLS, also known as "Jamie Montes," was married to defendant JULEY ELY, and the father of defendant GINGER ELY.

p. Defendant JOSEPH BROWN was an insurance agent licensed in Illinois and engaged in the business of assisting individuals with obtaining term life insurance policies. Defendant BROWN also was the owner and operator of a business that contracted with insurance companies to perform paramedical examinations on individuals who were applying for term life insurance policies.

q. Defendant STEVE MONTEGA, also known as "Fonzie Cerano," was the father of defendant NIKO RISTICK.

r. Defendant TONY RISTICK, also known as "Anthony Walker," was married to defendant RACHEL MONTEGA, also known as "Samantha Walker."

s. Defendant MARK BLANCA was married to defendant DIANA LUMAS.

t. Defendant RICKY BLANCA, also known as "Fonz Ristick," was the father of defendant JOE ROUGA.

u. Defendant DAVID JENSEN, also known as "Tony," was the father of defendant ROBERT CRAIG, also known as "Jake."

2. Beginning in or around October 2013 and continuing through in or around May 2022, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAMES MILLS, also known as "Jamie Montes,"
JOSEPH BROWN,
JULEY ELY,
GINGER ELY,
SYLVIA EVANS,
HOLLY STERGO, also known as "Holly Stego,"
JESSICA VACA,
ANGELA BECHO,
FRANK COSTELLO,
JOE ROUGA,
MARY BACCO,
STEVE MONTEGA, also known as "Fonzie Cerano,"
NIKO RISTICK,
TONY RISTICK, also known as "Anthony Walker,"
RACHEL MONTEGA, also known as "Samantha Walker,"
ROBERT CRAIG, also known as "Jake,"
STEVE VEGA, also known as "Cabby,"
SOPHIE BECHO,

MARK BLANCA,
DIANA LUMAS,
RICKY BLANCA, also known as "Fonz Ristick,"
DAVID JENSEN, also known as "Tony," and
JOE JOHN,

defendants herein, together with others known and unknown to the Grand Jury, knowingly devised, intended to devise, and participated in a scheme to defraud life insurance companies, namely, Companies A through J, and to obtain money from those companies by means of materially false and fraudulent pretenses, representations, and promises, as further described below.

3. It was part of the scheme that defendants JAMES MILLS, JOSEPH BROWN, JULEY ELY, GINGER ELY, SYLVIA EVANS, HOLLY STERGO, JESSICA VACA, ANGELA BECHO, FRANK COSTELLO, JOE ROUGA, MARY BACCO, STEVE MONTEGA, NIKO RISTICK, TONY RISTICK, RACHEL MONTEGA, ROBERT CRAIG, STEVE VEGA, SOPHIE BECHO, MARK BLANCA, DIANA LUMAS, RICKY BLANCA, DAVID JENSEN, and JOE JOHN, and others, fraudulently induced life insurance companies, including Companies A through J, to pay out millions of dollars in death benefits from life insurance policies by submitting and causing to be submitted materially false and fraudulent policy applications, and by submitting and causing to be submitted materially false and fraudulent benefit claims, in which the claimants knowingly misrepresented the identity of a decedent as the insured.

4. It was further part of the scheme that defendants JAMES MILLS, JOSEPH BROWN, JOE ROUGA, STEVE MONTEGA, TONY RISTICK, RACHEL

MONTEGA, STEVE VEGA, DAVID JENSEN, and JOE JOHN, and others, fraudulently induced Companies A through J to issue term life insurance policies covering various individuals (the "Subject Policies") by submitting and causing to be submitted materially false and fraudulent policy applications, in which defendants knowingly misrepresented information regarding the proposed insured, including the insured's identity, employment, income, net worth, medical history, health status, and relationship to designated beneficiaries.

5. It was further part of the scheme that, after Companies A through J issued the Subject Policies, defendants JAMES MILLS, JOSEPH BROWN, GINGER ELY, SYLVIA EVANS, HOLLY STERGO, ANGELA BECHO, JOE ROUGA, STEVE MONTEGA, TONY RISTICK, STEVE VEGA, SOPHIE BECHO, MARK BLANCA, RICKY BLANCA, and DAVID JENSEN, and others, made or caused to be made periodic premium payments to Companies A through J to ensure that the Subject Policies remained in force. At the time of these payments, these defendants knew that they needed to keep each policy in force for at least two years to move beyond the policy's period of contestability and that a false and fraudulent claim for death benefits would be submitted under the policy after that period of contestability had expired.

6. It was further part of the scheme that, after each Subject Policy had been in force for at least two years and the policy's period of contestability had expired, defendants JAMES MILLS, SYLVIA EVANS, JESSICA VACA, FRANK COSTELLO, JOE ROUGA, STEVE MONTEGA, TONY RISTICK, ROBERT CRAIG,

STEVE VEGA, SOPHIE BECHO, MARK BLANCA, RICKY BLANCA, DAVID JENSEN, and JOE JOHN, and others, made and caused to be made false and fraudulent representations to other individuals, including law enforcement personnel, first responders, medical personnel, funeral home staff, and cemetery employees, regarding the identities of deceased individuals, claiming those decedents were individuals insured by the Subject Policies. At the time, these defendants knew that the decedent was not the individual insured under a Subject Policy, that their false representation regarding the decedent's identity would be used to issue a false death certificate in the name of the insured, and that the death certificate issued in the wrong name would be used to support a false and fraudulent claim for death benefits under the Subject Policy.

7. It was further part of the scheme that, after each Subject Policy had been in force for at least two years and the policy's period of contestability had expired, defendants JAMES MILLS, JOSEPH BROWN, JULEY ELY, GINGER ELY, SYLVIA EVANS, HOLLY STERGO, ANGELA BECHO, JOE ROUGA, MARY BACCO, STEVE MONTEGA, NIKO RISTICK, TONY RISTICK, RACHEL MONTEGA, ROBERT CRAIG, STEVE VEGA, SOPHIE BECHO, MARK BLANCA, DIANA LUMAS, RICKY BLANCA, and DAVID JENSEN, and others, prepared and submitted and caused to be prepared and submitted, to Companies A through J, death benefit claim forms and other supporting documents, in which they falsely and fraudulently represented that:

a. The individuals insured under the Subject Policies had died, knowing that the insured had in fact not died and that the claim was based on the misidentification of a deceased individual as the insured; and,

b. The beneficiaries of the Subject Policies were related to the insured individuals, knowing that the beneficiaries were either not related to the insureds or related in a manner other than what was represented in the death benefit claim forms.

8. It was further part of the scheme that, after submitting and causing the submission of these false and fraudulent claims under the Subject Policies, defendants JAMES MILLS, JOSEPH BROWN, JULEY ELY, GINGER ELY, SYLVIA EVANS, HOLLY STERGO, JESSICA VACA, ANGELA BECHO, FRANK COSTELLO, JOE ROUGA, MARY BACCO, STEVE MONTEGA, NIKO RISTICK, TONY RISTICK, RACHEL MONTEGA, ROBERT CRAIG, STEVE VEGA, SOPHIE BECHO, MARK BLANCA, DIANA LUMAS, RICKY BLANCA, DAVID JENSEN, and JOE JOHN, and others, fraudulently induced Companies A through J to pay out at least approximately \$26,000,000 in life insurance death benefits under the Subject Policies.

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

10. On or about May 19, 2017, at Oak Lawn, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAMES MILLS, also known as "Jamie Montes,"
JOSEPH BROWN,
JESSICA VACA, and
HOLLY STERGO,

defendants herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an interstate wire transmission of approximately \$2,008,022.36 through the Federal Reserve System from Company A's bank account at Bank A to defendant HOLLY STERGO's bank account at Bank B;

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

COUNT TWO

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about June 13, 2017, at Schaumburg, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAMES MILLS, also known as "Jamie Montes,"
JOSEPH BROWN, and
JULEY ELY,

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be deposited with a commercial interstate carrier, namely Federal Express, a package to be sent and delivered to Company A in Cedar Rapids, Iowa, which package contained a death benefit claim for a life insurance policy issued by Company A;

In violation of Title 18, United States Code, Section 1341.

COUNT THREE

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about January 12, 2018, at Palos Heights, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAMES MILLS, also known as "Jamie Montes,"
JOSEPH BROWN,
ANGELA BECHO,
NIKO RISTICK,
SOPHIE BECHO, and
DAVID JENSEN, also known as "Tony,"

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company A in Cedar Rapids, Iowa, which package contained a death benefit claim for a life insurance policy issued by Company A;

In violation of Title 18, United States Code, Section 1341.

COUNT FOUR

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about May 29, 2018, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

JAMES MILLS, also known as "Jamie Montes,"
JOSEPH BROWN, and
SYLVIA EVANS,

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be deposited with a commercial interstate carrier, namely Federal Express, a package to be sent and delivered to Company A in Cedar Rapids, Iowa, which package contained a death benefit claim for two life insurance policies issued by Company A;

In violation of Title 18, United States Code, Section 1341.

COUNT FIVE

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about July 30, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAMES MILLS, also known as "Jamie Montes,"
JOSEPH BROWN, and
GINGER ELY,

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be deposited with a commercial interstate carrier, namely Federal Express, a package to be sent and delivered from Company A in Cedar Rapids, Iowa to defendant GINGER ELY in Oak Lawn, Illinois, which package contained a death benefit check in the amount of \$2,001,068.01 for a life insurance policy issued by Company A;

In violation of Title 18, United States Code, Section 1341.

COUNT SIX

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about September 5, 2018, at Schaumburg, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAMES MILLS, also known as "Jamie Montes,"
JOSEPH BROWN, and
JOE JOHN,

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be deposited with a commercial interstate carrier, namely Federal Express, a package to be sent and delivered to Company B in Grove City, Ohio, which package contained a death benefit claim for a life insurance policy issued by Company B;

In violation of Title 18, United States Code, Section 1341.

COUNT SEVEN

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about October 25, 2018, at Justice, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAMES MILLS, also known as "Jamie Montes,"
JOSEPH BROWN, and
MARY BACCO,

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company A in Cedar Rapids, Iowa, which package contained a death benefit claim for a life insurance policy issued by Company A;

In violation of Title 18, United States Code, Section 1341.

COUNT EIGHT

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about November 7, 2018, at Palos Heights, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAMES MILLS, also known as "Jamie Montes,"
JOSEPH BROWN,
FRANK COSTELLO, and
TONY RISTICK, also known as "Anthony Walker,"

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company A in Cedar Rapids, Iowa, which package contained a death benefit claim for a life insurance policy issued by Company A;

In violation of Title 18, United States Code, Section 1341.

COUNT NINE

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about November 14, 2018, at Norridge, in the Northern District of Illinois, Eastern Division, and elsewhere,

FRANK COSTELLO,
TONY RISTICK, also known as "Anthony Walker," and
RACHEL MONTEGA, also known as "Samantha Walker,"

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company D in Springfield, Missouri, which package contained a death benefit claim for a life insurance policy issued by Company D;

In violation of Title 18, United States Code, Section 1341.

COUNT TEN

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about January 18, 2019, at Bridgeview, in the Northern District of Illinois, Eastern Division, and elsewhere,

STEVE MONTEGA, also known as "Fonzie Cerano,"
MARK BLANCA, and
DIANA LUMAS,

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company C in Buffalo, New York, which package contained a death benefit claim for a life insurance policy issued by Company C;

In violation of Title 18, United States Code, Section 1341.

COUNT ELEVEN

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about January 21, 2019, at Palos Heights, in the Northern District of Illinois, Eastern Division, and elsewhere,

STEVE MONTEGA, also known as "Fonzie Cerano," and
NIKO RISTICK,

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company D in Springfield, Missouri, which package contained a death benefit claim for a life insurance policy issued by Company D;

In violation of Title 18, United States Code, Section 1341.

COUNT TWELVE

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about February 6, 2019, at Palos Heights, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAMES MILLS, also known as "Jamie Montes,"
JOSEPH BROWN,
JOE ROUGA,
TONY RISTICK, also known as "Anthony Walker," and
RACHEL MONTEGA, also known as "Samantha Walker,"

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company A in Cedar Rapids, Iowa, which package contained a death benefit claim for a life insurance policy issued by Company A;

In violation of Title 18, United States Code, Section 1341.

COUNT THIRTEEN

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about February 27, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAMES MILLS, also known as "Jamie Montes,"
JOSEPH BROWN,
STEVE VEGA, and
DAVID JENSEN, also known as "Tony,"

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company A in Cedar Rapids, Iowa, which package contained a death benefit claim for a life insurance policy issued by Company A;

In violation of Title 18, United States Code, Section 1341.

COUNT FOURTEEN

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about March 6, 2019, at Streamwood, in the Northern District of Illinois, Eastern Division, and elsewhere,

STEVE MONTEGA, also known as "Fonzie Cerano," and
DIANA LUMAS,

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company A in Cedar Rapids, Iowa, which package contained a death benefit claim for a life insurance policy issued by Company A;

In violation of Title 18, United States Code, Section 1341.

COUNT FIFTEEN

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about March 6, 2019, at Streamwood, in the Northern District of Illinois, Eastern Division, and elsewhere,

STEVE MONTEGA, also known as "Fonzie Cerano,"
MARK BLANCA, and
DIANA LUMAS,

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company C in Buffalo, New York, which package contained a death benefit claim for a life insurance policy issued by Company C;

In violation of Title 18, United States Code, Section 1341.

COUNT SIXTEEN

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about May 14, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

STEVE MONTEGA, also known as "Fonzie Cerano,"
STEVE VEGA, also known as "Cabby," and
DAVID JENSEN, also known as "Tony,"

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company D in Springfield, Missouri, which package contained a death benefit claim for a life insurance policy issued by Company D;

In violation of Title 18, United States Code, Section 1341.

COUNT SEVENTEEN

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about February 6, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAMES MILLS, also known as "Jamie Montes,"
JOSEPH BROWN,
STEVE VEGA, also known as "Cabby," and
DAVID JENSEN, also known as "Tony,"

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be deposited with a commercial interstate carrier, namely Federal Express, a package to be sent and delivered from Company A in Cedar Rapids, Iowa to defendant STEVE VEGA at an address in Palatine, Illinois, which package contained a death benefit check in the amount of \$1,111,061.74 for a life insurance policy issued by Company A;

In violation of Title 18, United States Code, Section 1341.

COUNT EIGHTEEN

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about April 1, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAMES MILLS, also known as "Jamie Montes,"
JOSEPH BROWN,
STEVE MONTEGA, also known as "Fonzie Cerano,"
ROBERT CRAIG, also known as "Jake,"
STEVE VEGA, also known as "Cabby," and
DAVID JENSEN, also known as "Tony,"

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company A in Cedar Rapids, Iowa, which package contained a death benefit claim for a life insurance policy issued by Company A;

In violation of Title 18, United States Code, Section 1341.

COUNT NINETEEN

The SPECIAL JULY 2021 GRAND JURY further charges:

3. The allegations in paragraphs 1 through 9 of Count One are realleged here.

4. On or about September 29, 2020, at Lake Bluff, in the Northern District of Illinois, Eastern Division, and elsewhere,

SOPHIE BECHO,

defendant herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company A in Cedar Rapids, Iowa, which package contained a death benefit claim for a life insurance policy issued by Company A;

In violation of Title 18, United States Code, Section 1341.

COUNT TWENTY

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about October 5, 2020, at Lake Bluff, in the Northern District of Illinois, Eastern Division, and elsewhere,

SOPHIE BECHO,

defendant herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company D in Springfield, Missouri, which package contained a death benefit claim for a life insurance policy issued by Company D;

In violation of Title 18, United States Code, Section 1341.

COUNT TWENTY-ONE

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about March 31, 2021, at Streamwood, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOE ROUGA,
STEVE VEGA, also known as "Cabby,"
MARK BLANCA, and
RICKY BLANCA, also known as "Fonz Ristick,"

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail matter to be delivered by the U.S. Postal Service a package addressed to Company C in Toronto, Ontario, Canada, which package contained a death benefit claim for a life insurance policy issued by Company C;

In violation of Title 18, United States Code, Section 1341.

COUNT TWENTY-TWO

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about August 17, 2021, at Burbank, in the Northern District of Illinois, Eastern Division, and elsewhere,

MARK BLANCA and
RICKY BLANCA, also known as "Fonz Ristick,"

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be deposited with a commercial interstate carrier, namely United Parcel Service, a package to be sent and delivered to Company C in Toronto, Ontario, Canada, which package contained a death benefit claim for a life insurance policy issued by Company C;

In violation of Title 18, United States Code, Section 1341.

COUNT TWENTY-THREE

The SPECIAL JULY 2021 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 9 of Count One are realleged here.

2. On or about August 20, 2021, at Burbank, in the Northern District of Illinois, Eastern Division, and elsewhere,

MARK BLANCA and
RICKY BLANCA, also known as "Fonz Ristick,"

defendants herein, for the purpose of executing the scheme, and attempting to do so, knowingly caused to be deposited with a commercial interstate carrier, namely United Parcel Service, a package to be sent and delivered to Company A in Cedar Rapids, Iowa, which package contained a death benefit claim for a life insurance policy issued by Company A;

In violation of Title 18, United States Code, Section 1341.

FORFEITURE ALLEGATION

The SPECIAL JULY 2021 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 1341 and 1343, as set forth in this Indictment, defendants shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to:

a. a personal money judgment in the amount of at least approximately \$26,000,000; and,

b. the following specific property:

- i. a Rolex Skydweller, serial number 5U189562;
- ii. a Rolex Daytona, serial number Y822536;
- iii. a Rolex Daytona, serial number Z604970;
- iv. a Rolex Datejust, serial number 85V69770;
- v. a Rolex Skydweller, serial number RN605735;
- vi. a Rolex Yachtmaster, serial number M035274;
- vii. a Rolex Datejust, serial number X759Q837;
- viii. a Rolex Daytona, serial number G884514;
- ix. a 2007 Hummer H2, VIN 5GRGN23U67H108529;
- x. a 2018 Chevrolet Corvette, VIN 1G1YB2D71J5104803;
- xi. a 2018 Mercedes-Benz S450, VIN WDDUG6GB0JA351791;
- xii. a 2019 Chevrolet Corvette, VIN 1G1YB3D77K5104019;
- xiii. a 2020 Chevrolet Silverado, VIN 1GC4YPEY0LF291098;

- xiv. a 2020 GMC Sierra Denali 1500, VIN 3GTP8FED4LG357414;
- xv. a 2020 GMC Sierra K1500, VIN 3GTU9DET8LG244657;
- xvi. a 2021 GMC Sierra, VIN 1GT49WEY3MF201371;
- xvii. a 2021 GMC Sierra, VIN 3GTP8FED7MG236037;
- xviii. the real property commonly known as 7960 West 80th Place, Bridgeview, Illinois, which is legally described as follows:

LOT 92 (EXCEPT THE EAST 90 FEET THEREOF) IN LAND'S 79TH AVENUE ESTATE, A SUBDIVISION OF PART OF THE NORTH 60 ACRES OF THE WEST HALF OF THE NORTHWEST QUARTER OF SECTION 36, TOWNSHIP 38 NORTH, RANGE 12, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN 18-36-113-038-0000;

- xix. the real property commonly known as 8501 New Castle Avenue, Burbank, Illinois, which is legally described as follows:

LOT 1 IN AZUS SUBDIVISION, BEING A SUBDIVISION OF PART OF THE EAST HALF OF THE SOUTHWEST QUARTER OF SECTION 31, TOWNSHIP 38 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN 19-31-317-002-0000/19-31-317-023-0000; and,

- xx. the real property commonly known as 9621 Kris Trail, Orland Park, Illinois, which is legally described as follows:

LOT 4 IN PALOS GOLF AND SADDLE CLUB, BEING A SUBDIVISION OF PART OF THE EAST $\frac{1}{2}$ OF THE SOUTHEAST $\frac{1}{4}$ OF SECTION 33, TOWNSHIP 37 NORTH, RANGE 12, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN 23-33-402-004-0000.

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).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY