



current title report; (b) a current appraisal; (c) a mortgage statement; and (d) an insurance certificate.

3. On June 30, 2011, after inquiry from the government, defense counsel informed the government that they were working to get the paperwork together.

4. On July 5, 2011, after inquiry from the government, defense counsel informed the government that it was continuing to work on the necessary paperwork and would have an update for the government in several days.

5. On July 11, 2011, and July 12, 2011, the defense provided several documents related to the defendant's personal residence. To date, the government has not received any documents related to the second residential property at issue.

6. Instead of continuing to wait for paperwork, it is the government's position that the defendant and any additional necessary parties (*e.g.* those individuals also on the title to the properties) should appear before the Court on July 15, 2011, and enter forfeiture agreements related to the two properties necessary to secure the defendant's bond.

WHEREFORE, the government requests that on July 15, 2011, the defendant and all other necessary parties appear before the Court, sign the paperwork to secure the defendant's bond, and be admonished by the Court

regarding the consequences of violations of the defendant's conditions of release.

Respectfully submitted,

PATRICK J. FITZGERALD  
United States Attorney

By: s/Reid Schar  
REID J. SCHAR  
CHRISTOPHER S. NIEWOEHNER  
CARRIE E. HAMILTON  
Assistant United States Attorneys  
219 S. Dearborn Street, 5<sup>th</sup> Floor  
Chicago, Illinois 60604  
(312) 353-5300

**CERTIFICATE OF SERVICE**

The undersigned Assistant United States Attorney hereby certifies that the following documents:

**GOVERNMENT'S MOTION FOR DEFENDANT TO SECURE BOND**

were served on July 12, 2011, in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

s/Reid Schar \_\_\_\_\_  
REID SCHAR  
Assistant United States Attorney  
219 S. Dearborn Street  
Chicago, IL 60604  
(312) 353-8897