

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

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U. S. DISTRICT COURT

UNITED STATES OF AMERICA )

v. )

JAN ROZYCKA, )

also known as "Jan Rozycki," )

also known as "John Hanus," )

also known as "Jarek," )

also known as "John Krzinski," )

IGNACY KONDRAD, )

also known as "Piotr Poltorak," )

also known as "Jan Jestal," )

WALDEMAR WILKIEWICZ, )

also known as "Robert Karolkiewicz," )

MICHAEL SKATULSKI, )

also known as "Michael Novak," )

MAGDALENA BANASIK, )

ROBERT KAROLKIEWICZ, )

ZBIGNIEW RECKO, )

also known as "Robert Karolkiewicz," )

also known as "Tomasz Wozny," )

also known as "Tomasz Romanzuk," )

also known as "Tomasz Godowski," )

also known as "Bradley Anatol Wawreniuk," )

also known as "Roman Parczewski," )

IOAN CORSIUC, )

BOZENA SAUCIUC, )

DOROTHY KAWA, )

JULITA URAMOWSKA, )

also known as "Julie Smalley" )

No. 03 CR 50054

Violations: Title 18, United States Code,  
Sections 1341, 1343, 1956(a)(1)(A)(i), and  
1956(a)(1)(B)(i)

**DOCKETED**  
APR 08 2004

**SUPERSEDING INDICTMENT**

25

**COUNT ONE**

The SEPTEMBER 2003 GRAND JURY charges:

1. At all times material to this superseding indictment, financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation, and other lenders loaned money to finance the purchase of residential properties.

2. At all times material to this superseding indictment, the following entities (collectively "title companies") provided closing services to ensure that real estate transactions were properly executed and funds relating thereto were properly disbursed:

a. First American Title Insurance Company (hereinafter "First American"), a company which maintained branch offices located at 30 North LaSalle Street, in Chicago, Illinois, 416 East Roosevelt Road, Suite 110, Wheaton, Illinois, and 610 North Route 31, Suite G, in Crystal Lake, Illinois;

b. Chicago Title Insurance Company (hereinafter "Chicago Title"), a company which maintained a branch offices located at 4425 D U.S. Route 14, in Crystal Lake, Illinois, and First Bank Plaza, in Lake Zurich, Illinois;

c. Stewart Title Company of Illinois (hereinafter "Stewart Title"), a company which maintained branch offices located at 2 North LaSalle Street, Suite 1920, in Chicago, Illinois, 495 North Riverside Drive, Suite 106, in Gurnee, Illinois, 800 East Diehl Road, Suite 180, in Naperville, Illinois, and 1300 Higgins Road, Suite 214, in Park Ridge, Illinois; and

d. Lawyer's Title Insurance Corporation, a company which maintained branch offices located at 5750 Old Orchard Road, Suite 100, in Skokie, Illinois, 5521 North Cumberland Avenue, Suite 1115, in Chicago, Illinois, and 1211 West 22nd Street in Oak Brook, Illinois.

e. Ticor Title Insurance Company, a company which maintained branch offices located at 899-901 Skokie Boulevard, Suite 112, in Northbrook, Illinois, 6250 West 95th Street, in Oak Lawn, Illinois, 750-51 East Bunker Court, in Vernon Hills, Illinois, and 800 Hart Road, Suite 220, in Barrington, Illinois.

3. At all times material to this superseding indictment, the following entities (collectively "mortgage brokers") engaged in the business of arranging for buyers of real estate to obtain financing from financial institutions and other lenders:

- a. P & I Financial Group, a company located in Northbrook, Illinois;
- b. Northwest Fidelity Mortgage Corporation ("Northwest Fidelity"), a company located in Morton Grove, Illinois; and
- c. HCP Mortgage Corporation (hereinafter "HCP Mortgage"), a company with its main office located in Rockford, Illinois.

4. From at least July 2002, through at least September 23, 2003, at Crystal Lake, in the Northern District of Illinois, Western Division, and elsewhere,

JAN ROZYCKA,  
also known as "Jan Rozycki,"  
also known as "John Hanus,"  
also known as "Jarek,"  
also known as "John Krzinski,"  
IGNACY KONDRAD,  
also known as "Piotr Poltorak,"  
also known as "Jan Jestal,"  
WALDEMAR WILKIEWICZ,  
also known as "Robert Karolkiewicz,"  
MICHAEL SKATULSKI,  
also known as "Michael Novak,"  
MAGDALENA BANASIK,  
ROBERT KAROLKIEWICZ,

ZBIGNIEW RECKO,  
also known as "Robert Karolkiewicz,"  
also known as "Tomasz Wozny,"  
also known as "Tomasz Romanzuk,"  
also known as "Tomasz Godowski,"  
also known as "Bradley Anatol Wawreniuk,"  
also known as "Roman Parczewski,"  
IOAN CORSIUC,  
BOZENA SAUCIUC,  
DOROTHY KAWA,  
JULITA URAMOWSKA,  
also known as "Julie Smalley,"

defendants herein, and others known and unknown to the grand jury, knowingly devised and engaged in a scheme to defraud financial institutions and other lenders, and to obtain money, funds, credit, and property belonging to these lenders by means of false and fraudulent pretenses, representations, and promises, which scheme is further described below.

5. It was the object of the scheme that defendants would and did fraudulently obtain more than \$9,000,000 from financial institutions and other lenders by arranging and executing fraudulent real estate closings through which defendants fraudulently obtained disbursements of the financial institutions' and lenders' funds.

6. It was part of the scheme that defendants posed as, and solicited other individuals to falsely pose as, buyers and sellers of real estate which they had no actual interest in buying or selling.

7. It was further a part of the scheme that the defendants often obtained for themselves, and for some of the other participants in this scheme, false identification documents, such as Illinois drivers' licenses and Illinois identification cards, which contained false names.

8. It was further a part of the scheme that the defendants and other participants in this scheme often misrepresented their identities to the title companies, financial institutions, and other lenders.

9. It was further a part of the scheme that defendants caused mortgage brokers to arrange for financial institutions and other lenders to provide financing to the purported buyers of the real estate involved in the scheme.

10. It was further a part of the scheme that defendants caused real estate closing transactions to be held at the title companies.

11. It was further a part of the scheme that many of the defendants appeared at these real estate closings and falsely represented that they were buying and selling the real estate involved in the closings, when, in fact, the defendants had no actual interest in buying or selling the real estate.

12. It was further a part of the scheme that defendant JAN ROZYCKA appeared at several of the fraudulent closings and represented that he was an employee of the mortgage broker.

13. It was further a part of the scheme that defendant JAN ROZYCKA appeared at several of the fraudulent closings and falsely represented that his name was "John Hanus" and that he was an attorney who represented the purported buyers and sellers.

14. It was further a part of the scheme that defendant MICHAEL SKATULSKI appeared at, participated in, and supervised several of the fraudulent closings.

15. It was further a part of the scheme that defendants prepared, and caused to be prepared, fraudulent mortgage releases, which falsely represented that the banks and mortgage companies which held mortgages against the real estate involved in the scheme had released their mortgages against those properties.

16. It was further a part of the scheme that by presenting the false mortgage releases to the title companies, defendants caused the title companies to disburse to defendants and their agents the funds provided by the financial institutions and other lenders.

17. It was further a part of the scheme that defendants presented, and caused to be presented, to the title companies written instructions directing the title companies to issue checks to defendants and various other individual participants in the scheme.

18. It was further a part of the scheme that, in order to conceal the proceeds of the scheme, defendants often caused the checks from the title companies to be made payable to third parties.

19. It was further a part of the scheme that, in order to conceal the proceeds of the scheme, defendants caused the checks that had been issued to third parties to be endorsed over to the defendants and deposited into the defendants bank accounts.

20. It was further a part of the scheme that, in order to prevent the scheme from being discovered, and to promote the carrying on of the scheme, defendants often used some of the proceeds of the scheme to make the mortgage payments on the real estate involved in the scheme.

21. It was further a part of the scheme that, in order to promote the carrying on the scheme, defendants often used some of the proceeds of the scheme for down-payments on real estate involved in subsequent fraudulent closings.

22. It was further a part of the scheme that, in order to conceal the proceeds of the scheme, defendants often withdrew from their bank accounts large portions of the scheme proceeds in the form of cash.

23. On or about November 27, 2002, in the Northern District of Illinois,

MAGDALENA BANASIK,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Chicago, in the Northern District of Illinois, certain signals, namely a bank transfer in the amount of \$296,071.05, which was deposited into Stewart Title's account at American National Bank & Trust Company of Chicago/Bank One in Chicago, Illinois;

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

**COUNT TWO**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.

2. On or about December 13, 2002, in the Northern District of Illinois,

MICHAEL SKATULSKI, and  
MAGDALENA BANASIK,

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Chicago, in the Northern District of Illinois, certain signals, namely a bank transfer in the amount of \$368,783.07, which was deposited into Stewart Title's account at American National Bank & Trust Company of Chicago/Bank One in Chicago, Illinois;

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

**COUNT THREE**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.

2. On or about December 23, 2002, in the Northern District of Illinois,

MAGDALENA BANASIK,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from Stamford, Connecticut, to Chicago, in the Northern District of Illinois, certain signals, namely a bank transfer in the amount of \$395,825.22 which was deposited into Stewart Title's account at American National Bank & Trust Company of Chicago/Bank One in Chicago, Illinois;

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

**COUNT FOUR**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.

2. On or about January 22, 2003, in the Northern District of Illinois,

MAGDALENA BANASIK,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be deposited for delivery by commercial interstate carrier, according to the direction thereon, a package containing a cashier's check which had been purchased by National City Bank c/o National Home Equity, in the amount of \$335,162.74, payable to Stewart Title Company, that package being addressed to:

Stewart Title Company  
2 North LaSalle Street, Suite 1920  
Chicago, Illinois 60602

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

**COUNT FIVE**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.
2. On or about March 21, 2003, in the Northern District of Illinois,

JAN ROZYCKA,  
also known as "John Krzinski,"  
MAGDALENA BANASIK, and  
ROBERT KAROLKIEWICZ,

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from Michigan, to Libertyville, in the Northern District of Illinois, certain signals, namely a bank transfer in the amount of \$253,695.78, which was deposited into Lawyers Title's account at National City Bank of Michigan/Illinois in Libertyville, Illinois;

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

**COUNT SIX**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.

2. On or about April 17, 2003, in the Northern District of Illinois,

MAGDALENA BANASIK, and  
ROBERT KAROLKIEWICZ,

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from Michigan, to Libertyville, in the Northern District of Illinois, certain signals, namely a bank transfer in the amount of \$280,995.86, which was deposited into Lawyers Title's account at National City Bank of Michigan/Illinois in Libertyville, Illinois;

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

**COUNT SEVEN**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.
2. On or about May 16, 2003, in the Northern District of Illinois,

JAN ROZYCKA,  
also known as "John Krzinski,"  
MICHAEL SKATULSKI,

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be deposited for delivery by commercial interstate carrier, according to the direction thereon, a package containing a check which had been drawn by American Mortgage, L.L.C., in the amount of \$229,032.53, payable to Lawyers Title, that package being addressed to:

Lawyers Title Company  
5750 Old Orchard Road, Suite 100  
Skokie, Illinois 60077

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

**COUNT EIGHT**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.
2. On or about May 21, 2003, in the Northern District of Illinois,

JAN ROZYCKA,  
also known as "John Krzinski,"  
MAGDALENA BANASIK, and  
ZBIGNIEW RECKO,  
also known as "Robert Karolkiewicz,"

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be deposited for delivery by commercial interstate carrier, according to the direction thereon, a package containing a check which had been drawn by American Mortgage, L.L.C., in the amount of \$361,075.01, payable to Lawyers Title, that package being addressed to:

Lawyers Title Company  
5750 Old Orchard Road, Suite 100  
Skokie, Illinois 60077

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

**COUNT NINE**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.
2. On or about June 25, 2003, in the Northern District of Illinois,

JAN ROZYCKA, and  
MICHAEL SKATULSKI,

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be deposited for delivery by commercial interstate carrier, according to the direction thereon, a package containing a check which had been drawn by Countrywide Home Loans, Inc., in the amount of \$201,318.08, payable to Lawyers Title, that package being addressed to:

Lawyers Title Company  
1211 West 22nd Street  
Oak Brook, Illinois 60523

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

**COUNT TEN**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.

2. On or about June 26, 2003, in the Northern District of Illinois,

MAGDALENA BANASIK, and  
ROBERT KAROLKIEWICZ,

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Libertyville, in the Northern District of Illinois, certain signals, namely a bank transfer in the amount of \$372,060.38, which was deposited into Lawyers Title's account at National City Bank of Michigan/Illinois in Libertyville, Illinois;

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

**COUNT ELEVEN**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.
2. On or about July 17, 2003, in the Northern District of Illinois,

JAN ROZYCKA,  
MICHAEL SKATULSKI,  
IOAN CORSIUC, and  
JULITA URAMOWSKA,  
also known as "Julie Smalley,"

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from Kansas City, Missouri, to Oak Brook, in the Northern District of Illinois, certain signals, namely a bank transfer in the amount of \$273,437.68, which was deposited into Lawyers Title's account at Oak Brook Bank in Oak Brook, Illinois;

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

**COUNT TWELVE**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.

2. On or about July 30, 2003, in the Northern District of Illinois,

IOAN CORSIUC,

defendant herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from Michigan, to Oak Brook, in the Northern District of Illinois, certain signals, namely a bank transfer in the amount of \$409,785.73, which was deposited into Lawyers Title's account at National City Bank of Michigan/Illinois in Libertyville, Illinois;

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

**COUNT THIRTEEN**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.
2. On or about August 29, 2003, in the Northern District of Illinois,

JAN ROZYCKA,  
also known as "John Hanus,"  
also known as "Jarek,"  
MICHAEL SKATULSKI, and  
BOZENA SAUCIUC,

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from Minneapolis, Minnesota, to Chicago, in the Northern District of Illinois, certain signals, namely a bank transfer in the amount of \$313,287.75, which was deposited into First American's account at American National Bank and Trust Company of Chicago/Bank One in Chicago, Illinois;

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

**COUNT FOURTEEN**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.

2. On or about September 5, 2003, in the Northern District of Illinois,

JAN ROZYCKA,  
also known as "John Hanus,"  
also known as "Jarek,"  
MICHAEL SKATULSKI,  
ZBIGNIEW RECKO,  
also known as "Tomasz Wozny," and  
BOZENA SAUCIUC,

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from New York, New York, to Chicago, in the Northern District of Illinois, certain signals, namely a bank transfer in the amount of \$414,039.26, which was deposited into Stewart Title's account at American National Bank and Trust Company of Chicago/Bank One in Chicago, Illinois;

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

**COUNT FIFTEEN**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.

2. On or about September 5, 2003, at Crystal Lake, in the Northern District of Illinois, Western Division,

JAN ROZYCKA,  
also known as "John Hanus,"  
also known as "Jarek,"  
ZBIGNIEW RECKO,  
also known as "Tomasz Romanzuk," and  
IOAN CORSIUC,

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from California, to Northbrook, in the Northern District of Illinois, certain signals, namely an electronic confirmation that a bank transfer, in the amount of \$258,662.86, had been deposited into Chicago Title's account at Bank of America;

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

**COUNT SIXTEEN**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.

2. On or about September 15, 2003, at Crystal Lake, in the Northern District of Illinois, Western Division,

JAN ROZYCKA,  
also known as "John Hanus,"  
also known as "Jarek,"  
ZBIGNIEW RECKO,  
also known as "Tomasz Godowski," and  
BOZENA SAUCIUC,

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from Pittsburgh, Pennsylvania, to Chicago, in the Northern District of Illinois, certain signals, namely a bank transfer in the amount of \$252,953, which was deposited into First American's account at American National Bank and Trust Company of Chicago/Bank One in Chicago, Illinois;

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

**COUNT SEVENTEEN**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.

2. On or about September 17, 2003, in the Northern District of Illinois,

JAN ROZYCKA,  
also known as "John Hanus,"  
also known as "Jarek,"  
ZBIGNIEW RECKO,  
also known as "Bradley Anatol Wawreniuk," and  
IOAN CORSIUC,

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from California, to Northbrook, in the Northern District of Illinois, certain signals, namely a confirmation that a bank transfer, in the amount of \$257,316.23, had been deposited into Chicago Title's account at Bank of America;

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

**COUNT EIGHTEEN**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.
2. On or about September 23, 2003, at Crystal Lake, in the Northern District of Illinois, Western Division,

JAN ROZYCKA,  
also known as "John Hanus,"  
also known as "Jarek,"  
WALDEMAR WILKIEWICZ,  
also known as "Robert Karolkiewicz," and  
IOAN CORSIUC,

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from California, to Northbrook, in the Northern District of Illinois, certain signals, namely a confirmation that a bank transfer, in the amount of \$180,035.66, had been deposited into Chicago Title's account at Bank of America;

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

**COUNT NINETEEN**

The SEPTEMBER 2003 GRAND JURY further charges:

1. Paragraphs 1 through 22 of Count One of this superseding indictment are realleged and incorporated herein as if fully set forth.
2. On or about September 23, 2003, at Crystal Lake, in the Northern District of Illinois, Western Division,

JAN ROZYCKA,  
also known as "John Hanus,"  
also known as "Jarek,"  
WALDEMAR WILKIEWICZ,  
also known as "Robert Karolkiewicz," and  
IGNACY KONDRAD,  
also known as "Piotr Poltorak,"

defendants herein, for the purpose of executing the aforesaid scheme, and attempting to do so, knowingly did cause to be transmitted by means of a wire communication in interstate commerce from Green Valley, Arizona, to Chicago, in the Northern District of Illinois, certain signals, namely a bank transfer in the amount of \$194,202.10, which was deposited into First American's account at American National Bank and Trust Company of Chicago/Bank One in Chicago, Illinois;

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

**COUNT TWENTY**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about December 21, 2002, in the Northern District of Illinois,

MAGDALENA BANASIK,

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely the making of a mortgage payment in the form of a \$1,700 check payable to Chase Manhattan, drawn on account number 1180043334 at Bank One, in Chicago, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, with the intent to promote the carrying on of the specified unlawful activity, that is by preventing Chase Manhattan from discovering the fraud scheme, and, while conducting and causing this financial transaction to be conducted, defendant knew that the property involved in the financial transaction, that is the funds in account number 1180043334, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**COUNT TWENTY ONE**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about December 24, 2002, in the Northern District of Illinois,

MAGDALENA BANASIK,

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely a deposit of a \$61,000 Stewart Title check payable to Sebastian Ciegilski, into account number 1180043334 at Bank One, in Chicago, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, knowing that such financial transaction was designed in whole or in part to conceal the nature, location, source, ownership, and control of the proceeds of that specified unlawful activity, and that the property involved in the financial transaction, namely the \$61,000 Stewart Title check payable to Sebastian Ciegilski, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**COUNT TWENTY TWO**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about February 13, 2003, in the Northern District of Illinois,

**ROBERT KAROLKIEWICZ,**

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely a deposit of a \$235,382.19 Ticor Title check payable to Stan B. Knowlton, into account number 602278452 at MidAmerica Bank, in Chicago, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, knowing that such financial transaction was designed in whole or in part to conceal the nature, location, source, ownership, and control of the proceeds of that specified unlawful activity, and that the property involved in the financial transaction, namely the \$235,382.19 Ticor Title check payable to Stan B. Knowlton, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**COUNT TWENTY THREE**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about March 10, 2003, in the Northern District of Illinois,

**ROBERT KAROLKIEWICZ,**

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely the making of a mortgage payment of a \$4,969.69 payable to IndyMac Bank, drawn on account number 602278452 at MidAmerica Bank, in Chicago, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, with the intent to promote the carrying on of the specified unlawful activity, that is by preventing IndyMac Bank from discovering the fraud scheme, and, while conducting and causing this financial transaction to be conducted, defendant knew that the property involved in the financial transaction, that is the funds in account number 602278452, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**COUNT TWENTY FOUR**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about May 28, 2003, in the Northern District of Illinois,

IGNACY KONDRAD,

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely the making of a mortgage payment in the form of a \$1,850 check payable to Washington Mutual Savings Bank, drawn on account number 8552303105 at Charter One Bank, in Chicago, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, with the intent to promote the carrying on of the specified unlawful activity, that is by preventing Washington Mutual Savings Bank from discovering the fraud scheme, and, while conducting and causing this financial transaction to be conducted, defendant knew that the property involved in the financial transaction, that is the funds in account number 8552303105, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**COUNT TWENTY FIVE**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about May 30, 2003, in the Northern District of Illinois,

IGNACY KONDRAD,

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely the making of a mortgage payment in the form of a \$1,800 check payable to Chase Manhattan Mortgage Corp., drawn on account number 8552303105 at Charter One Bank, in Chicago, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, with the intent to promote the carrying on of the specified unlawful activity, that is by preventing Chase Manhattan from discovering the fraud scheme, and, while conducting and causing this financial transaction to be conducted, defendant knew that the property involved in the financial transaction, that is the funds in account number 8552303105, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**COUNT TWENTY SIX**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about June 30, 2003, in the Northern District of Illinois,

IGNACY KONDRAD,

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely the making of a mortgage payment in the form of a \$2,550 check payable to IndyMac Bank, drawn on account number 8552303105 at Charter One Bank, in Chicago, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, with the intent to promote the carrying on of the specified unlawful activity, that is by preventing IndyMac Bank from discovering the fraud scheme, and, while conducting and causing this financial transaction to be conducted, defendant knew that the property involved in the financial transaction, that is the funds in account number 8552303105, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**COUNT TWENTY SEVEN**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about July 24, 2003, in the Northern District of Illinois,

IGNACY KONDRAD,

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely the making of a mortgage payment in the form of a \$3,700 check payable to Option One, drawn on account number 8552303105 at Charter One Bank, in Chicago, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, with the intent to promote the carrying on of the specified unlawful activity, that is by preventing Option One Mortgage from discovering the fraud scheme, and, while conducting and causing this financial transaction to be conducted, defendant knew that the property involved in the financial transaction, that is the funds in account number 8552303105, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**COUNT TWENTY EIGHT**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about July 31, 2003, in the Northern District of Illinois,

IGNACY KONDRAD,

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely a deposit of a \$411,723.45 Lawyers Title check payable to Safiya Djurakulova, into account number 8552303105 at Charter One Bank, in Chicago, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, knowing that such financial transaction was designed in whole or in part to conceal the nature, location, source, ownership, and control of the proceeds of that specified unlawful activity, and that the property involved in the financial transaction, namely the \$411,723.45 Lawyers Title check payable to Safiya Djurakulova, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**COUNT TWENTY NINE**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about July 31, 2003, in the Northern District of Illinois,

IGNACY KONDRAD,

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely the making of a mortgage payment in the form of a \$2,800 check payable to American National Bank of DeKalb, drawn on account number 8552303105 at Charter One Bank, in Chicago, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, with the intent to promote the carrying on of the specified unlawful activity, that is by preventing American National Bank of DeKalb from discovering the fraud scheme, and, while conducting and causing this financial transaction to be conducted, defendant knew that the property involved in the financial transaction, that is the funds in account number 8552303105, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**COUNT THIRTY**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about September 5, 2003, in the Northern District of Illinois,

**BOZENA SAUCIUC,**

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely the making of a mortgage payment in the form of a \$2,800 check payable to American National Bank of DeKalb, drawn on account number 2871112736 at TCF National Bank, in Willowbrook, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, with the intent to promote the carrying on of the specified unlawful activity, that is by preventing American National Bank of DeKalb from discovering the fraud scheme, and, while conducting and causing this financial transaction to be conducted, defendant knew that the property involved in the financial transaction, that is the funds in account number 2871112736, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**COUNT THIRTY ONE**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about September 6, 2003, in the Northern District of Illinois,

IGNACY KONDRAD,  
also known as "Jan Jestal,"

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely a deposit of a \$395,220.32 Stewart Title check payable to Tomasz Wozny, into account number 56-162951-8 at Liberty Bank for Savings, in Chicago, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, knowing that such financial transaction was designed in whole or in part to conceal the nature, location, source, ownership, and control of the proceeds of that specified unlawful activity, and that the property involved in the financial transaction, namely the \$395,220.32 Stewart Title check payable to Tomasz Wozny, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**COUNT THIRTY TWO**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about September 6, 2003, in the Northern District of Illinois,

**DOROTHY KAWA,**

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely a deposit of a \$20,000 Chicago Title check payable to Tomasz Romanzuk, into account number 8412410507 at Charter One Bank, in Morton Grove, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, knowing that such financial transaction was designed in whole or in part to conceal the nature, location, source, ownership, and control of the proceeds of that specified unlawful activity, and that the property involved in the financial transaction, namely the \$20,000 Chicago Title check payable to Tomasz Romanzuk, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**COUNT THIRTY THREE**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about September 15, 2003, in the Northern District of Illinois,

JAN ROZYCKA,  
also known as "John Hanus," and  
IGNACY KONDRAD,  
also known as "Jan Jestal,"

defendants herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely a deposit of a \$229,359.02 First American check payable to Jan Jestal, into account number 01-01548550 at First Security Federal Savings Bank, in Chicago, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, knowing that such financial transaction was designed in whole or in part to conceal the nature, location, source, ownership, and control of the proceeds of that specified unlawful activity, and that the property involved in the financial transaction, namely the \$229,359.02 First American check payable to Jan Jestal, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**COUNT THIRTY FOUR**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about September 16, 2003, in the Northern District of Illinois,

ROBERT KAROLKIEWICZ,

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely a deposit of a \$25,000 First American check payable to Tomasz Godowski, into account number 602278452 at MidAmerica Bank, in Norridge, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, knowing that such financial transaction was designed in whole or in part to conceal the nature, location, source, ownership, and control of the proceeds of that specified unlawful activity, and that the property involved in the financial transaction, namely the \$25,000 First American check payable to Tomasz Godowski, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**COUNT THIRTY FIVE**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about September 17, 2003, in the Northern District of Illinois,

DOROTHY KAWA,

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely a deposit of a \$10,000 Chicago Title check payable to Bradley Anatol Wawreniuk, into account number 8412410507 at Charter One Bank, in Morton Grove, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, knowing that such financial transaction was designed in whole or in part to conceal the nature, location, source, ownership, and control of the proceeds of that specified unlawful activity, and that the property involved in the financial transaction, namely the \$10,000 Chicago Title check payable to Bradley Anatol Wawreniuk, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**COUNT THIRTY SIX**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about September 17, 2003, in the Northern District of Illinois,

MAGDALENA BANASIK,

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely a deposit of a \$20,000 Chicago Title check payable to Bradley Anatol Wawreniuk, into account number 1180043334 at Bank One, in Chicago, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, knowing that such financial transaction was designed in whole or in part to conceal the nature, location, source, ownership, and control of the proceeds of that specified unlawful activity, and that the property involved in the financial transaction, namely the \$20,000 Chicago Title check payable to Bradley Anatol Wawreniuk, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**COUNT THIRTY SEVEN**

The SEPTEMBER 2003 GRAND JURY further charges that:

On or about September 17, 2003, in the Northern District of Illinois,

IOAN CORSIUC,

defendant herein, did knowingly conduct and cause to be conducted a financial transaction affecting interstate commerce, namely a deposit of a \$78,000 Chicago Title check payable to Bradley Anatol Wawreniuk, into account number 30-414090-1 at Liberty Bank for Savings, in Chicago, Illinois, which financial transaction involved the proceeds of a specified unlawful activity, namely the fraud scheme more fully described in Count One of this superseding indictment, knowing that such financial transaction was designed in whole or in part to conceal the nature, location, source, ownership, and control of the proceeds of that specified unlawful activity, and that the property involved in the financial transaction, namely the \$78,000 Chicago Title check payable to Bradley Anatol Wawreniuk, represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**FORFEITURE ALLEGATION**

The SEPTEMBER 2003 GRAND JURY further charges:

1. The allegations contained in Counts One through Thirty Seven of this Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982.

2. As a result of their violations of Title 18, United States Code, Sections 1341, 1343, and 1956, as alleged in the foregoing indictment,

JAN ROZYCKA,  
also known as "Jan Rozycki,"  
also known as "John Hanus,"  
also known as "Jarek,"  
also known as "John Krzinski,"  
IGNACY KONDRAD,  
also known as "Piotr Poltorak,"  
also known as "Jan Jestal,"  
WALDEMAR WILKIEWICZ,  
also known as "Robert Karolkiewicz,"  
MICHAEL SKATULSKI,  
also known as "Michael Novak,"  
MAGDALENA BANASIK,  
ROBERT KAROLKIEWICZ,  
ZBIGNIEW RECKO,  
also known as "Robert Karolkiewicz,"  
also known as "Tomasz Wozny,"  
also known as "Tomasz Romanzuk,"  
also known as "Tomasz Godowski,"  
also known as "Bradley Anatol Wawreniuk,"  
also known "Roman Parczewski,"  
IOAN CORSIUC,  
BOZENA SAUCIUC,  
DOROTHY KAWA, and  
JULITA URAMOWSKA,  
also known as "Julie Smalley,"

3. The interests of the defendants, jointly and severally, subject to forfeiture pursuant to Title 18, United States Code, Section 982, include: all money and other property that was the subject of each transaction, constituted and was derived from the proceeds of each transaction and was obtained, directly and indirectly, as a result of those violations, including but not limited to:

- (a) Approximately \$9,673,359.86;
- (b) All funds contained in Account Number 56-162951-8 in the name of "Jan Jestal" at Liberty Bank for Savings, in Chicago, Illinois;
- (c) All funds contained in Account Number 30-414090-1 in the name of Ioan Corsiuc at Liberty Bank for Savings, in Chicago, Illinois;
- (d) All funds contained in Account Number 110380437 in the name of Roman Parczewski and Jagoda Kuchrska at Mid-America Bank, in Chicago, Illinois; and
- (e) a 2002 Bentley Armage 4DSW, VIN: SCBLF34F32CX08596, titled in the state of Illinois in the name of "Jan Rozycki."

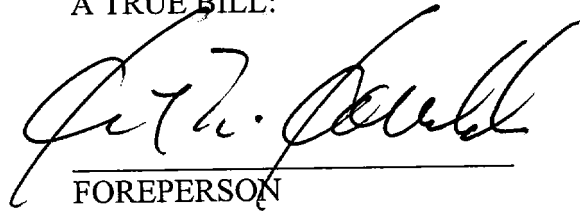
4. If any of the property subject to forfeiture and described above, as a result of any act or omission of the defendants:

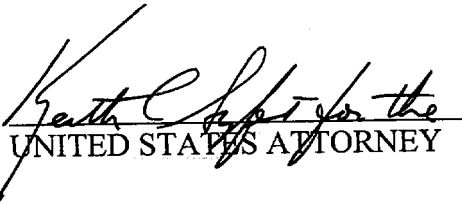
- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or
- (e) Has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Section 982.

A TRUE BILL:

  
\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
UNITED STATES ATTORNEY

No. 03 CR 50054

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA

vs.

IAN ROZYCKA, IGNACY KONDRAD, WALDEMAR WILKIEWICZ, MICHAEL SKATULSKI,  
MAGDALENA BANASIK, ROBERT KAROLKIEWICZ, ZBIGNIEW RECKO, IOAN CORSIUC,  
BOZENA SAUCIUC, DOROTHY KAWA, and JULITA URAMOWSKA

SUPERSEDING INDICTMENT

Violation(s): Title 18, United States Code,  
Sections 1341, 1343, 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i)

A JUDGE OF THE COURT,  
*[Signature]*

Foreman

Filed in open court this *5th* day of *April*, A.D. *2004*

*[Signature]*  
Clerk

Bail, \$ \_\_\_\_\_