

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
-v-	)	No. 24-cr-00424
	)	Judge Daniel
FRANCESCO DISTEFANO,	)	Magistrate Judge Cole
	)	
Defendant.	)	

**UNOPPOSED MOTION TO SET HEARING FOR PRE-TRIAL RELEASE WITH
CONDITIONS**

NOW COMES the Defendant, FRANCESCO DISTEFANO, by and through counsel, pursuant to 18 USC §3142(f) and respectfully requests that the Court enter an Order granting defendant Pre-Trial Release with the conditions stated below.

IN SUPPORT of this Motion, Defendant states that on September 10, 2024, Defendant was indicted for a non-violent fraud offense. ECF 1. On September 11, 2024, an arrest warrant was issued. ECF 4. Defendant was arrested on September 11, 2024, at O'Hare airport and his initial appearance was held on September 11, 2024. ECF 6. On September 16, 2024, Defendant waived his right to a detention hearing and consented to detention. The Court entered an Order that the waiver and consent were without prejudice and that Defendant could move at a later time for pretrial release. ECF 13. On December 13, 2024, following his initial detention hearing, defendant was ordered detained by the Honorable Jeffery Cole determining that was no condition or set of conditions, other than continued detention, that would reasonably assure the presence of the defendant at trial if he were released on bond. ECF 46.

1. The Government anticipates that it will not oppose pretrial release upon the conditions stated below, and is in the process of reviewing the proposed collateral and other remaining due diligence.

2. Attached to this Motion is a proposed Order Setting Conditions of Release and Appearance Bond, containing all proposed conditions of release. Most notable is that defendant will participate in the Home Incarceration program at his residence located at 157 Oak Mill Road, Addison, Illinois, restricted to a 24-hour a-day lockdown except for medical necessities, mental health treatment, attorney visits and court appearances or for other activities approved by the court. Further a secured bond of \$1,000,000 is agreed to by the government and defendant, secured by two homes in Addison, Illinois.

WHEREFORE, Defendant respectfully requests that the Court enter an Order setting a hearing on a day certain to determine the relief requested in this Motion.

Respectfully submitted,

/s/ Robert A. Fisher
Robert A. Fisher
One of the attorneys for
FRANCESCO DISTEFANO

Robert A. Fisher
FISHERLEVINE LAW GROUP LLP
20 South Clark Street, Suite 700
Chicago, Illinois 60603
(312) 372-8888
raf@fisherlevinelaw.com

Barry A. Spevack
MONICO & SPEVACK LLC
53 West Jackson Blvd. Suite 1315
Chicago, Illinois 60604
312-782-8500
bspevack@monicolaw.com