

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 FOR RETURN OF PROPERTY

NOW COMES the Defendant, FRANCESCO DISTEFANO, by and through counsel, and moves this honorable court for an Order for return of personal property which was seized at the time of his arrest. In support of his Motion, defendant states as follows:

1. On September 11, 2024, Defendant was arrested at O'Hare airport by agents of the FBI. At the time of his arrest agents seized and inventoried defendant's personal property. A list of defendant's property inventoried by the FBI is attached to this motion and marked as Exhibit 1.

2. In 2021 while under investigation, defendant filed a Freedom of Information Request for information related to the investigation. As a result of that FOIA request, the FBI is unable to return the property without a defendant withdrawing the FOIA request. Defendant's counsel provided, a letter withdrawing the FOIA request, which included language requested by FBI counsel. The letter withdrawing the FOIA request is attached and marked as Exhibit 2.

3. Counsel for the defendant has now been informed that a court Order to return the property would facilitate its return. Among the items contained in the property is defendant's wallet which contains his identification, necessary to get medical attention and even to enter

the Dirksen building to attend court. The items to be returned are as follows:

Item #	Description
1B10	(U) Cash [\$2,125]
1B9	(U) 9 Laptop Case 10 Apple Laptop and Cord - Serial HT4J7QV7NG, model A2681
1B8	(U) 8 Wallets and credit cards
1B7	(U) 6 Apple iPhone - Francesco Distefano
1B6	(U) 1 Illinois Identification Card for Francesco Distefano 2 Illinois Driver's License for Francesco Distefano
1B5	(U) Black Louis Vuitton Duffle Bag containing clothing and other general miscellaneous items.

4. The government, through Assistant United States Attorney Jeffrey Snell does not oppose the court granting the relief requested in this Motion. AUSA Snell has discussed the property return with the case agent from the FBI.

WHEREFORE, Defendant respectfully requests that the Court enter an Order authorizing the FBI to return defendant's property listed above in Paragraph 3, to defendant or his counsel.

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