

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 24 CR 424
	)	
	)	Judge Jeremy C. Daniel
FRANCESCO DISTEFANO	)	
	)	

**GOVERNMENT'S UNOPPOSED MOTION
TO EXONERATE BOND**

The United States of America by its attorney, ANDREW S. BOUTROS, United States Attorney of the Northern District of Illinois, respectfully moves as follows:

1. Pursuant to a Pre-Trial Release Order entered April 24, 2025, Sam Distefano and Connie Distefano, as Trustees of the Distefano Family Living Trust Dated the 5th day of December, 2016, posted their interest in certain real property to secure the defendant's release on bond. As a result, the property was encumbered pending the defendant's completion of the bond requirements.

2. As the defendant's bond was subsequently revoked, and he was remanded to the custody of the U.S. Marshal, the government hereby submits this motion to exonerate the bond. In addition, the government requests that this Court order the release of any liens or other encumbrances lodged against the real property as it relates to this bond and further order that the quit claim deeds executed in favor of the United States of America, currently held in the custody of the Clerk of the

United States District Court, Northern District of Illinois, be returned to the sureties at the property address.

3. Defendant's counsel has been contacted regarding this motion and counsel has no objection to the motion or the entry of the Order.

WHEREFORE, the government respectfully requests this Court exonerate the bond posted in this case.

Respectfully submitted,

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