

STATE OF ILLINOIS        )  
                                      ) SS GENERAL NO. 16 CF \_\_\_\_\_  
COUNTY OF LAKE         )

**DCN: NEEDS TO BE BOOKED**  
OF THE DECEMBER, 2015 TERM OF THE CIRCUIT COURT  
OF THE NINETEENTH JUDICIAL CIRCUIT COURT OF THE  
COUNTY OF LAKE IN THE STATE OF ILLINOIS

Count 1.       That the Grand Jurors chosen, selected and sworn, in and for the County of Lake, in the State of Illinois, having been duly recalled, in the name and by authority of the People of the State of Illinois, upon their oaths present that **MELODIE A. GLINIEWICZ, DOB: 08/19/1964**, hereinafter called the defendant, between **September 2008 and September 2015**, in the County of Lake and State of Illinois, committed the offense of **DISBURSING CHARITABLE FUNDS WITHOUT AUTHORITY AND FOR PERSONAL BENEFIT**, in that the said defendant and Charles J. Gliniewicz, in a series of acts in furtherance of a common scheme or design, without lawful authority, intentionally caused the use of charitable funds, being the funds of the Fox Lake Police Explorers, over which he was a fiduciary, to be used for personal benefit in the amount in excess of \$1,000 within a three year period; in violation of 225 ILCS 460/19; contrary to the form of the Statutes in such case made and provided, and against the peace and dignity of the People of the State of Illinois.

**Pursuant to 720 ILCS 5/3-8, at least one of the acts in the series was committed within the past three years.**

Count 2. That the Grand Jurors chosen, selected and sworn, in and for the County of Lake, in the State of Illinois, having been duly recalled, in the name and by authority of the People of the State of Illinois, upon their oaths present that **MELODIE A. GLINIEWICZ, DOB: 08/19/1964**, hereinafter called the defendant, between **September 2008 and September 2015**, in the County of Lake and State of Illinois, committed the offense of **DISBURSING CHARITABLE FUNDS WITHOUT AUTHORITY AND FOR PERSONAL BENEFIT**, in that the said defendant and Charles J. Gliniewicz, in a series of acts in furtherance of a common scheme or design, without lawful authority, intentionally caused the use of charitable funds, being the funds of the Fox Lake Police Explorers, over which she was a fiduciary, to be used for personal benefit in the amount in excess of \$1,000 within a three year period; in violation of 225 ILCS 460/19; contrary to the form of the Statutes in such case made and provided, and against the peace and dignity of the People of the State of Illinois.

**Pursuant to 720 ILCS 5/3-8, at least one of the acts in the series was committed within the past three years.**

Count 3. That the Grand Jurors chosen, selected and sworn, in and for the County of Lake, in the State of Illinois, having been duly recalled, in the name and by authority of the People of the State of Illinois, upon their oaths present that **MELODIE A. GLINIEWICZ, DOB: 08/19/1964**, hereinafter called the defendant, between **September 2012 and September 2015**, in the County of Lake and State of Illinois, committed the offense of **DISBURSING CHARITABLE FUNDS WITHOUT AUTHORITY AND FOR PERSONAL BENEFIT**, in that the said defendant, without lawful authority, intentionally caused the use of charitable funds, being the funds of the Fox Lake Police Explorers, over which she was a fiduciary to be used for personal benefit in the amount in excess of \$1,000 within a three year period; in violation of 225 ILCS 460/19; contrary to the form of the Statutes in such case made and provided, and against the peace and dignity of the People of the State of Illinois.

Count 4. That the Grand Jurors chosen, selected and sworn, in and for the County of Lake, in the State of Illinois, having been duly recalled, in the name and by authority of the People of the State of Illinois, upon their oaths present that **MELODIE A. GLINIEWICZ, DOB: 08/19/1964**, hereinafter called the defendant, between **September 2012 and September 2015**, in the County of Lake and State of Illinois, committed the offense of **DISBURSING CHARITABLE FUNDS WITHOUT AUTHORITY AND FOR PERSONAL BENEFIT**, in that the said defendant, without lawful authority, intentionally caused the use of charitable funds, being the funds of the Fox Lake Police Explorers, over which she was a fiduciary to be used for personal benefit; in violation of 225 ILCS 460/19; contrary to the form of the Statutes in such case made and provided, and against the peace and dignity of the People of the State of Illinois.

Count 5. That the Grand Jurors chosen, selected and sworn, in and for the County of Lake, in the State of Illinois, having been duly recalled, in the name and by authority of the People of the State of Illinois, upon their oaths present that **MELODIE A. GLINIEWICZ, DOB: 08/19/1964**, hereinafter called the defendant, between **September 2012 and September 2015**, in the County of Lake and State of Illinois, committed the offense of **MONEY LAUNDERING**, in that the said defendant and Charles J. Gliniewicz, knowing that the property involved in a financial transaction represents the proceeds of some unlawful activity, being the Personal Use and Benefit of Charitable Funds belonging to the Fox Lake Police Explorers, the defendant and Charles J. Gliniewicz conducted a series of acts in furtherance of a common scheme or design, being financial transactions with criminally derived property and the financial transactions were designed in whole or in part to disguise the source of the criminally derived property and the value of the criminally derived property exceeds \$10,000 but does not exceed \$100,000; in violation of 720 ILCS 5/29B-1(a)(1)(B)(i); contrary to the form of the Statutes in such case made and provided, and against the peace and dignity of the People of the State of Illinois.

Count 6. That the Grand Jurors chosen, selected and sworn, in and for the County of Lake, in the State of Illinois, having been duly recalled, in the name and by authority of the People of the State of Illinois, upon their oaths present that **MELODIE A. GLINIEWICZ, DOB: 08/19/1964**, hereinafter called the defendant, between **September 2012 and September 2015**, in the County of Lake and State of Illinois, committed the offense of **MONEY LAUNDERING**, in that the said defendant, knowing that the property involved in a financial transaction represents the proceeds of some unlawful activity, being the Personal Use and Benefit of Charitable Funds belonging to the Fox Lake Police Explorers, said defendant conducted a financial transaction with the criminally derived property and the financial transaction was designed, in whole or in part, to disguise the source of the criminally derived property and the value of the criminally derived property does not exceed \$10,000; in violation of 720 ILCS 5/29B-1(a)(1)(B)(i); contrary to the form of the Statutes in such case made and provided, and against the peace and dignity of the People of the State of Illinois.

A TRUE BILL

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FOREPERSON

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GENERAL NO. 16 CF \_\_\_\_\_

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**CIRCUIT COURT OF LAKE COUNTY**

SGT GREGORY, LAKE COUNTY SHERIFF

DECEMBER, 2015 TERM

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THE PEOPLE OF THE STATE  
OF ILLINOIS

vs.

MELODIE A. GLINIEWICZ, DOB: 8/19/1964

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INDICTMENT FOR:

CTS. 1-3, CHARITABLE FUNDS, PERSONAL BENEFIT OR USE, (CLASS 2)

CT. 4, CHARITABLE FUNDS, PERSONAL BENEFIT OR USE, (CLASS 3)

CT. 5, MONEY LAUNDERING, (CLASS 2)

CT. 6, MONEY LAUNDERING, (CLASS 3)

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**A TRUE BILL**

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FOREPERSON OF THE GRAND JURY

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FILED \_\_\_\_\_, 2016

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CLERK OF THE COURT

BAIL -- \$ \_\_\_\_\_

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**MICHAEL G. NERHEIM**

**LAKE COUNTY STATE'S ATTORNEY**

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