



2. Since April 21, Mr. Scalise secured additional property from his family and friends to post for bond. The following is a list of items Mr. Scalise's family and friends agree to post as security for his release:

- Clarendon Hills Home, owned by Linda Pizza, Value \$690,000, Equity \$181,000
- Land in Hawaii, owned by Thomas Seaman (brother-in-law), Market Value per Property Assessment \$365,200, no mortgage
- Monee Home, owned by Algiras A. Macevicius (friend), Appraised at \$225,000, Equity \$136,000

3. In addition to posting property, Mr. Scalise would agree to abide by restrictive conditions of bond, including electronic monitoring and 24-hour home confinement. Ms. Pizza would be willing to act as the designated person for Mr. Scalise.

4. These proposed conditions are more than adequate to assure the safety of the community and prevent flight.

5. Mr. Scalise incorporates herein the legal arguments made in Doc. No. 34, Defendants Pullia and Rachel's Response To Government's Motion To Revoke Magistrate Nolan's Order Granting Pretrial Release.

WHEREFORE Defendant Jerry Scalise respectfully moves this Honorable Court to release him on bail subject to conditions.

Respectfully submitted,

/s/ Edward M. Genson

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**CERTIFICATE OF SERVICE**

I, EDWARD M. GENSON, an attorney for Defendant Jerry Scalise, hereby certify that on this, the 9th day of August, 2010, I filed the above-described document on the CM/ECF system of the United States District Court for the Northern District of Illinois, which constitutes service of the same.

/s/ Edward M. Genson

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