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A LIMITED LIABILITY COMPANY
INCLUDING PROFESSIONAL CORPORATIONS

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HON. HENRY "SKIP" TONIGAN, RET.

Press Release

Melodie Gliniewicz is thankful for the ongoing love and support provided by so many friends, neighbors and community members. Even with this comfort, words still cannot describe the depths of Melodie's ongoing pain and hardship caused by the sudden death of her husband and watching her children suffer from the loss of their father. Melodie respectfully requests that the community, law enforcement, pension board and press refrain from rushing to, or misplacing, judgment. Melodie has faith that the truth will come out in time, and if necessary, in court.

Relating to Melodie's attached court filings, sometime on November 6, 2015, the Lake County State's Attorney's Office, without notice to Melodie or her attorneys, and without probable cause, obtained a "freeze order" restraining Melodie's access to her personal checking and savings accounts. Melodie and her counsel were dismayed to discover the existence of the freeze order after Melodie unsuccessfully tried to purchase gas to fill up her car on Monday, November 9, 2015.

At this time, Melodie is unable to pay her ongoing mortgage, doctor bills and other family expenses. Therefore, Melodie has been forced to file the attached motion seeking a prompt hearing and lifting of the temporary court order that is freezing Melodie's personal checking and savings accounts.

Melodie's attached motion addresses incomplete items contained in an affidavit from the Lake County State's Attorney's investigator concerning Explorer account funds. The investigator's affidavit stated that \$26,800 of direct deposits went into the Explorer account from the Village of Fox Lake. The investigator's affidavit omitted the fact that this \$26,800 amount was paid over a

five year period from Melodie's husband's net paycheck and not from the Village. The investigator's affidavit also referenced a \$32,000 deposit into the Explorer account from Nationwide Retirement Solutions on January 10, 2014. The investigator's affidavit omitted that this \$32,000 was deposited into the Explorer account by Melodie's husband from a loan he took out from his own retirement plan. This January 10, 2014, \$32,000 deposit also preceded her husband's March 26, 2014 withdrawal of \$7,000 from the Explorer account.

Again, Melodie respectfully requests that all refrain from rushing to, or misplacing, judgment. Melodie has faith that the truth will come out. At this time, Melodie and her attorneys will not be providing additional comments or interviews beyond the scope of this press release and the attached court filings. Melodie respectfully requests the press and public to respect her family's privacy.

Andrew J. Kelleher, Jr.

Hon. Henry "Skip" Tonigan, Ret.

Vasili D. Russis

STATE OF ILLINOIS)
) ss
COUNTY OF LAKE)

FILED
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Kelli W. ...
CIRCUIT CLERK

IN THE CIRCUIT COURT OF THE NINETEENTH
JUDICIAL CIRCUIT, LAKE COUNTY, ILLINOIS

IN THE MATTER OF FREEZING:)
BMO HARRIS BANK Accounts held)
by Charles J. Gliniewicz and/or)
Fox Lake Police Explorers or)
Fox Lake Police Association, and/or)
Melodie Gliniewicz, being BMO Harris)
Bank Account Numbers:)
4816437916 and 0199003696)

CHRISTOPHER C. STARON
15 MR 1966
GENERAL NO.

MOTION PURSUANT TO 720 ILCS 5/29B-1(f)(2)
FOR HEARING AND LIFTING OF TEMPORARY ORDER

COF

Now comes **MELODIE GLINIEWICZ**, applicant, by and through her attorneys, **KELLEHER & BUCKLEY, LLC**, and **SMITH, LaLUZERNE & HARTMAN, LTD.**, and pursuant to 720 ILCS 5/29B-1(f)(2), requests a hearing to lift the temporary restraining order mislabeled as a "freeze order" entered on application of the Lake County State's Attorney's Office on November 6, 2015 and states in support of said motion as follows:

1. On November 6, 2015, a "freeze order" was entered by Judge Betar as to BMO Harris Bank account 0199003696, see attached order.
2. Melodie Gliniewicz is the owner of the aforesaid account.
3. The applicant, Melodie Gliniewicz, was not given prior notice of the application by the State for an order pertaining to this account.
4. The order is defective and the application provided to the Court including the affidavit are deficient under 720 ILCS 5/29B-1(f)(2) and must as a matter of law be stricken and held for naught in that:
 - a. The application and affidavit in this matter was signed by William Biang, an investigator with the Lake County State's Attorney's office, not a member of the Department of State Police. Pursuant to 720 ILCS 5/29B-1(e), only the Department of State Police is authorized to serve seizure notices, warrants, subpoenas and summons under the authority of this statute.

b. Although the “freeze order” and affidavit executed by Mr. Biang do not reference the precise section of statutory authority for the November 6, 2015 order, the only section which permits action without notice to the owner of the account is 720 ILCS 5/29B-1(f)(2) entitled Protective Order. Under this provision the State may seek a “temporary restraining order” if:

the State demonstrates that there is probable cause to believe that the property with respect to which the order is sought would be subject to forfeiture under this section.

and

that provision of notice will jeopardize the availability of the property for forfeiture. 720 ILCS 5/29B-1(f)(2).

As the State has not and cannot demonstrate probable cause under either of the above requirements, the order must be stricken.

DEFICIENCIES OF BIANG AFFIDAVIT

The affidavit of Mr. Biang is deficient as to both requirements of the statute.

A. The affidavit is not even addressed to the financial institution listed on the “freeze order of November 6, 2015.” The order is directed to the applicant’s account at BMO Harris Bank but the affidavit asserts in two places that the funds sought to be the subject of the Court’s order were held at US Bank, NOT BMO Harris. The Court never should have issued the “freeze order” based upon an affidavit executed misidentifying the financial institution. This is no different than making application for a search warrant and listing the wrong address on the affidavit for the property to be searched, see *People v. Urbina*, 393 Ill.App.3d 1074 (2nd Dist. 2009), where the Appellate Court held that a wrong unit number on a search warrant for a particular address was grounds to quash the warrant.

B. The affidavit does not meet the requirement of showing probable cause that the property would be subject to forfeiture. The application and affidavit do not reference any subsection of the statute that would constitute the criminal offense of money laundering. There are approximately ten different provisions under 29B-1(a) that constitutes the offense of money laundering, the State provided the court a three paragraph affidavit of Mr. Biang as to the applicant, Melodie Gliniewicz, never stating probable cause as to the offense of money laundering.

1. Paragraph 1 states that the largest source of funds in the account are direct deposits from Fox Lake (presumably the applicant for the order meant the Village of Fox Lake and not the geographic area of Fox Lake but the affidavit does not

state that). Paragraph 1 notes that these are bi-weekly deposits in the amount of \$2,000 each. The paragraph does not allege that the deposited funds are the result of a violation of any section of the money laundering statute, and further, the State could not properly allege that the deposits were evidence of money laundering, these direct deposits were a portion of the applicant's late husband's salary. (It should be noted that this information on these deposits was within the control and knowledge of the Village of Fox Lake). As stated, paragraph 1 did not allege anything that would rise to the level of probable cause to believe the property in the account would be subject to forfeiture and is irrelevant to any grounds for a temporary restraining order, (f)(2), or protective order (f) under the statute.

2. Paragraph 2 of the allegation to the mis-identified account alleges that Charles J. Gliniewicz (not the applicant Melodie Gliniewicz) deposited \$7,000 in cash into this account on March 27, 2014. The affidavit goes on to state that Charles J. Gliniewicz had the day prior withdrawn \$7,000 from an Explorer account at US Bank, ending in account 3740. Nowhere in this affidavit or in other affidavits filed in this matter does the State indicate how this transfer is a violation of the money laundering statute. In fact, the State's application identified account ending in 3740 at US Bank as "account name Fox Lake Explorers/Charles J. Gliniewicz" and identifies the source of funds as "checking for individuals and organizations made payable to the Fox Lake Explorers program." This allegation again does not allege any violation of money laundering statutes and fails to identify who the owner of the funds is, other than Charles J. Gliniewicz. Accordingly, as paragraph 2 of the affidavit alleges that Charles J. Gliniewicz withdrew \$7,000 from an account where he was listed as an owner and moved it into his wife's account, there is no criminal allegation contained therein. The only allegation of criminal conduct is when the affidavit states that the transfer "may be indicative of intent to conceal the activity". What a transfer "may be indictative" of is not an allegation that would support a determination that probable cause exists that the crime of money laundering occurred and that Melodie Gliniewicz is guilty of that offense.

3. Having failed to allege with any specificity the transfer of \$7,000 on March 27, 2014 was criminal in any way, the State then proceeds in paragraph 3 of Mr. Biang's affidavit to assert that between August 2013 (some 7 months before the \$7,000 transfer) and August 2015, Melodie Gliniewicz wrote four checks to US Bank Explorer account (ending with 3740) totaling \$6,190.52. It should have been unclear to the Court how this allegation was "probable cause" of a crime. The only date referred to in paragraph 3 is December 22, 2014 when a check cleared; the paragraph goes on to state that this was "four months after the Hawaii vacation was funded via the Explorers 3740 accounts." Only by conjecture, guess and speculation - NOT PROBABLE CAUSE - could a court find that the \$7,000 withdrawal on March 27, 2014 was a criminal act and that Melodie Gliniewicz was aware of the criminal act, or how the affiant determined that the payment of \$4,275.72 made on December 22, 2014 was for something four months prior. Finally, reimbursement would indicate no criminal intent exists to permanently deprive the owner of property.

The affidavit taken in full does not suggest probable cause that the crime of money laundering was committed by Melodie Gliniewicz, does not allege who, other than Charles J. Gliniewicz, was the owner of the Explorer account 3740, and does not allege that Melodie Gliniewicz's account 3696 at BMO Harris is subject to forfeiture under the money laundering statute. It should further be noted that in the State's affidavit as to Fox Lake Explorers/Charles J. Gliniewicz (US Bank account 3740 and credit card 8748), the State acknowledges (a) direct deposits from Fox Lake totaling \$26,800 since December 2009, and (b) a single deposit of \$32,000 from Nationwide Retirement Solutions on January 10, 2014. Evidence will show that the \$26,800 were direct deposits from the net salary due to Charles J. Gliniewicz from the Village of Fox Lake and that the \$32,000 was Charles J. Gliniewicz's funds from a retirement plan loan taken by Charles J. Gliniewicz from his own retirement account. Accordingly, \$58,800 of the money in account 3740 came from Charles J. Gliniewicz. (Again, the information of which was within the control and knowledge of the Village of Fox Lake.) Also of note is that the same affidavit states that account 3740 was closed on April 1, 2015, yet in the affidavit seeking to "freeze" the applicant's funds, the affiant is stating, oddly enough, that the applicant was writing checks to this closed account until August 2015.

The State's pleading does not and cannot accurately state that the \$7,000 withdrawn by Charles J. Gliniewicz from account 3740 was not part of the \$58,800 (or other amounts) that Charles J. Gliniewicz deposited into account 3740. There was no "money laundering" as to this \$7,000 transfer, as one cannot launder one's own money.

C. Jeopardy of Availability of Funds. As to this statutory requirement for a temporary restraining order under (f)(2) of the money laundering statute, Mr. Biang's affidavit offers nothing. The pleadings of the State totally ignore the statutory mandate that the State demonstrate that:

That there is probable cause to believe that the property with respect to which the order is sought would be subject to forfeiture under this section and that provision of notice will jeopardize the availability of the property for foreclosure. 720 ILCS 5/29B-1(f)(2).

The mere conclusory language of the Court's November 6, 2015 order that the Court was "satisfied that the affidavit before me established probable cause to believe that the subject property so described is subject to forfeiture under 720 ILCS 5/29B-1 and that grounds exist for the issuance of this protective order" does not satisfy the statutory mandate under subsection (f)(2) that the State must show that absent the entry of this order the property may not be available.

The owner of this account in question, Melodie Gliniewicz, is a 51 old widow with three children at home, one of whom is a sophomore at Antioch High School, she has a home subject to a substantial mortgage relative to the fair market value of the

home, and is seeking retirement benefits due her late husband. The State does not allege that Melodie Gliniewicz has threatened to close the account and flee the jurisdiction or that the funds are in jeopardy. The grossly insufficient affidavits of the State have left Melodie Gliniewicz without assets to put food on her table or to pay her mortgage, and if the State is going to use this extraordinary action, it should be required to follow the statutory requirements to seek not a "freeze order", but a temporary restraining order under 720 ILCS 5/29B-1(f)(2).

WHEREFORE, applicant, MELODIE GLINIEWICZ, prays this Honorable Court to immediately lift the temporary restraining order mis-characterized as a "freeze order" entered November 6, 2015 and to allow Melodie Gliniewicz access to her property.

Respectfully submitted,

KELLEHER & BUCKLEY, LLC

By: 
ANDREW J. KELLEHER, JR.

SMITH, LaLUZERNE & HARTMAN, LTD.

By: 
CHARLES W. SMITH

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**IN THE CIRCUIT COURT OF THE 19TH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS**

IN THE MATTER OF FREEZING:

JP Morgan/Chase Bank Accounts held by Charles J. Gliniewicz
And/or Fox Lake Police Explorers or Fox Lake Police Association,
And/or Melodie Gliniewicz, being JP Morgan/Chase Bank Accounts
Associated with their social security numbers 348-56-6721 and/or 361-66-1239

**APPLICATION AND AFFIDAVIT
FOR FREEZE ORDER**

This matter coming before the court, I William Biang, Investigator of the Lake County State's Attorney's Office, being duly sworn states as follows;

I am a law enforcement officer for the Lake County State's Attorney's Office and have reason to believe that in the County of Lake, State of Illinois, the above described property is subject to a protective order and/or forfeiture pursuant to 720 ILCS 5/29B-1 for a violation of Money Laundering, the facts which warrant a finding of probable cause for issuance of a protective order or seizure warrant, pursuant to 725 ILCS 5/29B-1, are as follows:

1. Your affiant states on September 1, 2015, Fox Lake Police Officers responded to a call for assistance after three subjects ran from Fox Lake Officer, Lt. Joseph Gliniewicz. Upon arrival, a gunshot was heard and a short time later Lt. Gliniewicz was located in a wooded area shot to death.

2. Your affiant states that Lt. Gliniewicz' death has since been ruled a suicide by the Lake County Coroner's Office, after evidence showed that he had been shot twice with his own weapon, once in his protective vest and once in the upper left area of his torso.

3. Your affiant states that Lt. Gliniewicz ran the Explorer program for the Village of Fox Lake, which was a youth program for teens interested in law enforcement.

4. Your affiant states that text messages and Facebook messages were recovered which indicated that Gliniewicz and his wife Melodie Gliniewicz exerted unauthorized control over funds belonging to the Fox Lake Explorer program. Said messages also showed that there was an on-going issue between Gliniewicz and the Fox Lake Village manager over the use and management of Explorer funds.

5. Your affiant states that the following investigative details are the result of analysis of US Bank records and credit card records, including monthly statements, cancelled checks, deposit slips for the following accounts:

<u>Bank</u>	<u>Account Number</u>	<u>Account Name</u>
US Bank	1-993-7225-3740	Fox Lake Police Explorers/ Charles J. Gliniewicz
US Bank	1-993-7493-5989	Charles J. Gliniewicz
US Bank	2-993-8279-1562	Charles Gliniewicz
US Bank	1-993-7235-0751	Fox Lake Police Association
BMO Harris	4816437916	Fox Lake Explorer Post 300
BMO Harris	0199003696	Melodie Gliniewicz

<u>Card company</u>	<u>Card Number</u>	<u>Name on Card</u>
US Bank	4798531211808748	Fox Lake Police Explorers/ Charles J Gliniewicz
US Bank	4037840071028805	Charles J Gliniewicz

Fox Lake Explorers / Charles J. Gliniewicz -- US Bank account -3740 and credit card -8748

Sources of Funds

The primary source of funds deposited to the US Bank account ended -3740 in the name of Fox Lake Explorers / Charles J. Gliniewicz ("Explorers -3740") included checks from individuals and organizations made payable to the Fox Lake Explorer program (269 checks totaling \$100,115.56). These consisted primarily of donations from local businesses, payments for services rendered (i.e., "parking lot security"), and checks which appear to be from parents enrolling their children in the Explorer program.

The account also reflects 204 deposits totaling \$43,289.97 from the Village of Fox Lake and related entities. This total consisted of direct deposits from Fox Lake (\$26,800.00), checks from the Village of Fox Lake made payable both to the Explorer program (34 checks totaling \$7,551.29) as well as to Charles J. Gliniewicz (6 checks totaling \$3,342.68). Checks to the Explorer program from the Fox Lake Area Chamber of Commerce & Industry and the Fox Lake Volunteer Fire Department totaled \$5,596.00.

The direct deposits from Fox Lake began in December of 2009 with bi-weekly deposits of \$50. The bi-weekly deposits then increased to \$75 starting June 2010, \$100 starting in November 2011, \$150 starting in November 2012, \$225 starting in May 2013, \$300 starting in December 2013, and finally to \$450 (March 2014 - March 2015). Overall, direct deposits from Fox Lake totaled \$26,800.00. The account also received a single \$32,000.00 deposit from NATIONWIDE RETIREMENT SOLUTIONS on 1/10/2014.

At total of 61 cash deposits to the account totaled \$26,328.00, with the largest single deposit (\$4,700.00) occurring on 8/12/2014. Cash deposits averaged approximately \$430.

Uses of Funds

Between September, 2008 and April, 2015, the account appears to have been used to cover personal expenses on a consistent basis. These included both routine charges and significant purchases.

Routine transactions included Starbucks and Dunkin Donuts (238 transactions totaling \$2,455.16), restaurants (453 charges totaling \$8,822.48), the Fox Lake Theatre (93 charges totaling \$2,515.75), and health clubs, athletic event registration, and hormonal supplements (98 charges totaling \$7,216.92). Additionally, there were a total of 66 transactions for adult entertainment and dating websites (\$2,623.52) charged to this account.

In August 2014, a trip to Hawaii resulted in \$5,683.59 in charges to this account, excluding airfare. The bank statements show a US Airways charge of \$2,079.70 on 8/1/2014 which is most likely related to the Hawaii trip, but this cannot be confirmed based on bank records alone.

Cash withdrawals from the account between September 2008 and April 2015 totaled \$29,157.90. The largest cash withdrawal (\$7,000) was made via counter withdrawal on 3/26/2014. The day after this withdrawal (3/27/2014), \$7,000 in cash was deposited to the BMO Harris bank account in the name of Melanie A. Gliniewicz (-3696). Based on the matching amounts and close timing of this cash withdrawal and subsequent deposit, it appears that the \$7,000 was transferred from the Explorer - 3740 account to the Melodie Gliniewicz account. The transferring of funds via cash may be indicative of an effort to conceal the activity. (Note: Approximately two weeks later, Melodie Gliniewicz wrote a \$7,000 check to herself which appears to have been deposited to JP Morgan Chase Bank on 4/14/2014. A subpoena has been issued to JP Morgan Chase Bank regarding any accounts under the control of Melodie or Charles Gliniewicz, and the production is pending.)

The account was also used to make several loan payments, the largest of which (\$15,234.59) was a student loan made to the Department of Education on 2/14/2014. A total of \$8,495.48 was paid to Cass Loans via 14 monthly payments of \$606.82 between February 2014 and March 2015. Further investigation is required to determine the purpose of this loan.

Closing of US Bank Account, Opening of BMO Harris Account

On 3/27/2015, Gliniewicz wrote a check to transfer \$4,000 from the US Bank Explorer -3740 account to open a new account at BMO Harris Bank in the name of Fox Lake Explorer Post 300. Five days later (4/1/2015), Gliniewicz transferred the remaining balance in the Explorers -3740 account (\$940.48) to his personal account at US Bank (-5989) and closed the Explorers -3740 account.

Fox Lake Explorer Post 300 - BMO Harris account - 7916

Sources of Funds

The primary source of funds deposited to the Fox Lake Explorer Post 300 BMO Harris account ended -7916 ("Explorers -7916") was checks from individuals and organizations made payable to the Explorer program (12 checks totaling \$15,450), the largest of which was one \$8,000 check from the Lake County Fair Association in August 2015.

A \$2,781.00 check from the Melodie A. Gliniewicz BMO Harris bank account (-3696) was deposited to the Explorers -7916 account in April of 2015. The memo line of the check contained the notation, "Paid in full."

Uses of Funds

Between March and September of 2015, the most significant use of funds in the account was three payments to PF Pettibone totaling \$6,242.90. PF Pettibone appears to be a police supply store located in McHenry, IL. One of these payments was made via check with "uniforms" notated in the memo line. Gliniewicz also wrote two checks totaling \$2,746.62 to his personal account at US Bank (-5989) which appear to be reimbursements for credit card payments made on the Explorer credit card (-8748).

This account appears to have been used to cover personal expenses to some extent, though to a lesser extent than the US Bank Explorers -3740 account. In June 2015, Gliniewicz wrote a check to Donald Gliniewicz for \$777.00 with "loan" notated in the memo line of the check.

Cash withdrawals from the account totaled \$1,112.45, and charges to the account included American Airlines (1 transaction for \$694.70), restaurants (9 transactions totaling \$613.87), Best Buy (3 transactions for \$754.35), and grocery and convenience stores (9 transactions totaling \$296.74), among other miscellaneous charges. The purpose of these expenses and whether or not they related to the Explorer program cannot be determined based on bank records alone.

Charles J. Gliniewicz personal accounts – US Bank accounts -5989 and 1562, credit card -8805

After Gliniewicz closed the US Bank Explorer -3740 account in March 2015, he opened two personal accounts at US Bank in April of 2015 (-5989 and -1562) in addition to the new Explorer account at BMO Harris Bank.

Sources of Funds

Bi-weekly Fox Lake direct deposits which had previously been deposited to the US Bank Explorer -3740 account appears to have resumed in the new US Bank personal account ended -5989. These were the largest source of funding to the account (11 deposits totaling \$4,950). Two checks from the BMO Harris Explorers account (-7916) totaling \$2,746.62 were deposited to this account, which appear to have been reimbursements for payments he made from the -5989 account to the Explorer credit card ended -8748.

The account ended -1562 shows minimal activity, with only four transfers of \$50 or less between April and August of 2015. These appear to have been automatic transfers between this account and the other personal account ended -5989.

Uses of Funds

This account appears to have been used for daily living expenses (vehicle expenses, fitness clubs, movie theaters, restaurants, hair salons, etc.). The most significant use of funds was payments to Cass Loans (5 transactions totaling \$3,640.92).

Gliniewicz's personal credit card ended -8805 reflects less than \$2,000 in total charges. The largest expense category was athletic event registration (\$752.48). These were paid to the Tough Mudder Race as well as CT Event Registration, which appears to be a race entrance fee collection service.

Melodie A. Gliniewicz account – US Bank -3696

Sources of Funds

The largest source of funding reflected in the US Bank account in the name of Melodie A. Gliniewicz was direct deposits from Fox Lake (55 deposits totaling \$109,560.91). These deposits averaged approximately \$2,000 each and were paid on a bi-weekly basis.

On 3/27/2014, \$7,000 in cash was deposited to this account. This occurred the day after Charles J. Gliniewicz withdrew \$7,000 in cash from the Explorer account (US Bank -3740). Therefore, it appears likely that the \$7,000 in cash was transferred from the Explorer account to this personal account. This cash transfer may be indicative of intent to conceal the activity.

Uses of Funds

Between August 2013 and August 2015, Melodie Gliniewicz wrote four checks to the US Bank Explorer account (-3740) totaling \$6,190.52. The largest of these checks (\$4,275.72) reflects the notation "Hawaii reimburse pd in full." This check cleared on 12/22/14, approximately four months after the Hawaii vacation was funded via the Explorer -3740 account.

Fox Lake Police Association account – US Bank -0751

It does not appear that Charles Gliniewicz was a signatory on this account. The account appears to have been used primarily as a repository for donations from individuals and local businesses for annual events such as "Shop with a Cop." The largest contributor to the account was Dockers Duffers (5 checks totaling \$69,549.46), and the most significant use of funds was Wal-Mart purchases (12 payments totaling \$47,908.76).

A single check was written to Melodie Gliniewicz in September of 2009 for \$175.00, with "Bagpipes for funeral" notated in the memo line. Aside from this check, this account does not appear to be associated with Charles J. Gliniewicz or Melodie Gliniewicz.

The money held in all accounts associated with the JP Morgan/Chase Bank accounts more fully described above have been used in the commission of the offense of theft and money laundering. Accordingly, it is hereby ordered that JP Morgan/Chase Bank shall freeze the above described accounts from any transactions pending forfeiture proceedings for a period not to exceed 30 days.

DATED: 11/6/15 William O. B...
Signature of Affiant

Subscribed to and sworn before me on 11-6-15
[Signature]
JUDGE

IN THE CIRCUIT COURT OF THE 19TH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS

IN THE MATTER OF FREEZING:

JP Morgan/Chase Bank Accounts held by Charles J. Gliniewicz
And/or Fox Lake Police Explorers or Fox Lake Police Association,
And/or Melodie Gliniewicz
being JP Morgan/Chase Bank Accounts
Associated with their social security numbers 348-56-6721 and/or 361-66-1239

FREEZE ORDER

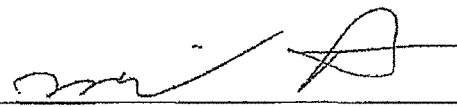
TO: Investigator William Biang of the Lake County State's Attorney's Office and all peace officers of the State of Illinois, having before me an affidavit by Investigator, who has reason to believe that in the County of Lake, State of Illinois, there is certain property, being JP Morgan/Chase Bank Account Numbers associated with social security numbers 348-56-6721 and/or 361-66-1239, are subject to forfeiture to the State of Illinois, pursuant to 720 Illinois Compiled Statutes 5/29B-1, namely:

JP Morgan/Chase Bank Accounts held by Charles J. Gliniewicz
And/or Fox Lake Police Explorers or Fox Lake Police Association,
And/or Melodie Gliniewicz, being JP Morgan/Chase Bank Accounts associated with social security numbers 348-56-6721 and/or 361-66-1239

I am satisfied that the affidavit before me establishes probable cause to believe that the subject property so described is subject to forfeiture under 720 ILCS 5/29B-1, and that grounds exist for the issuance of this protective order.

THEREFORE YOU ARE HEREBY SUBJECT TO: said restraining order regarding the property specified above and may take any and all action to preserve the availability of said property. Said order shall expire not more than 30 days after the date on which it is entered, unless it is extended for good cause shown, or unless the party against whom it is entered consents to an extension. You are further commanded to notify the Office of the State's Attorney of Lake County of the protective order, and provide it with an inventory of the property seized, its estimated value, and the facts.

DATED: This 6 day of NOV. 2011, 2011.

ENTERED: 
JUDGE