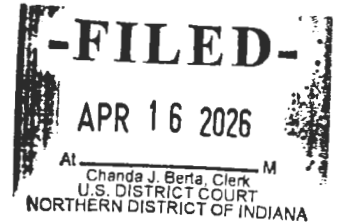


UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION



UNITED STATES OF AMERICA)

v.)

JAMES L. GERODEMOS a/k/a "Jimmy the Greek")

DEAN GIALAMAS a/k/a "Dean Gem")

CHRIS L. GERODEMOS)

BASAM FAWZI IBRAHIM a/k/a "Donny Brasco")

SANAD WALID IBRAHIM a/k/a "Sanad Taka")

PETER PAVLOPOULOS a/k/a "Pete Goodys")

FILIPPO ROVITO a/k/a "Gigi")

MICHAEL D. CAMPBELL a/k/a "Michael Way Out")

a/k/a "Chuckie Hoffa")

EHAB MUSTAFA a/k/a "Eddie")

STEVE ARMENTA)

SAMUEL A. NUZZO)

ALEXANDER G. GAGIANAS a/k/a "Alex Gyros")

GUS KAPORIS a/k/a "Deans Runner")

RAMI F. MANSOUR a/k/a "Rami Straight Flush")

NENAD RADOJA a/k/a "Butch Hunkee")

MARCUS VLADIMIR GANZ a/k/a "Vladimir Ganz")

PAUL FRANZE a/k/a "Paulie Scarf")

ATHENA OLGA GERODEMOS)

ELIAS CHRIS GERODEMOS)

JAMES STREZOVSKI a/k/a "Jim Macedonian")

ANDREW NGUYEN a/k/a "Ceasars Andrew")

GIUSEPPE MANZI a/k/a "Joe Polozzo")

Case No. 2:26cr69

18 U.S.C. § 1955

18 U.S.C. § 1951

18 U.S.C. § 894

18 U.S.C. § 1956

18 U.S.C. § 1957

18 U.S.C § 1956(h)

18 U.S.C § 1084

Forfeiture Allegation

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(Operation of Illegal Gambling Business)

The Organization/Operation of the Illegal Gambling Business

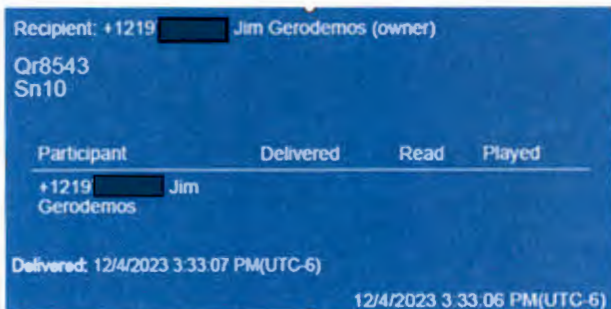
Sports Betting with Illegal Online Sports Betting Sites

1. The Gerodemos Gambling Organization was headquartered in Lake County, Indiana. Defendants JAMES GERODEMOS and DEAN GIALAMAS were the leaders of the Gerodemos Gambling Organization.
2. The Gerodemos Gambling Organization used internet websites, which included but were not limited to www.abcwagering.ag and www.gardencitybets.com to conduct its bookmaking activities. In addition to the websites, the Gerodemos Gambling Organization also used telephone numbers and text messaging to conduct its bookmaking activities. Bets were placed in the Northern District of Indiana and elsewhere in the United States by use of the internet and telephone. The websites and telephone numbers were staffed and supported by individuals who resided outside the United States. A bettor could use the website or a telephone number to place bets on various types of sporting activities (i.e. football, baseball, basketball, etc.).
3. The Gerodemos Gambling Organization required a bettor to establish a betting account. The betting account consisted of an account number and a password provided by either JAMES GERODEMOS or DEAN GIALAMAS. The betting account was typically set-up by an agent or bookie who worked for the Gerodemos Gambling Organization after receiving the necessary password and username from JAMES GERODEMOS.

These agents and bookies worked in the Northern District of Indiana and elsewhere in the United States.

4. The Gerodemos Gambling Organization did not require a bettor to put any money into their betting account before placing a bet. Instead, the Gerodemos Gambling Organization provided gamblers lines of credit allowing the bettors to begin their betting almost immediately through the illegal gambling websites, or over the telephone, without needing any actual cash to do so.

5. The Gerodemos Gambling Organization bookies and bettors were required to enter their account number and password on the website, or give their account number and password over the telephone, before placing a sports bet. The odds for these sports bets were published on the illegal sports gambling websites and were detailed over the phone. The results of a bettor's winning and losing sports bets were recorded on the website. The following are examples of Username/passwords for abcwagering:



Username	BetType	Amount
QRB446 (SKZ)	0	714	3	0 0
QRB451 (DQ)	0	-250	0	0 0
QRB461 [redacted]	0	-1,340	-1,000	0 0
QRB468 (SANA02)	0	433	0	0 0
QRB474 [redacted]	0	-290	0	0 0
QRB483 (VLAD)	0	0	0	0 0
QRB485 (DQ)	0	376	250	0 0
QRB489 (DQC)	0	-2,000	0	0 0
QRB493 (BSAND1)	0	-25	0	0 0

and screen captures from abcwagering (with the bettor's code names) and Gardencitybets online illegal sports betting websites:

BETTOR	0	-115	0	200	500	0	100	500	720	0	222	
RAY	0	-1,000	440	-67	-100	0	-300	-1,700	-3,675	720	0	-2,675
FOK	0	-715	-100	-1,701	-1,814	0	-1,200	-1,613	-6,000	1,230	0	-4,480
SUNKISS	0	0	0	0	0	-100	0	0	-100	0	0	-10
MOSES	0	0	-710	-600	-1,000	0	0	650	-310	-2,800	4,320	-2,80
PAV	0	210	0	100	200	0	-2,070	174	-1,200	770	0	-1,21
BN1	0	2,000	0	4,000	0	0	-2,200	2,000	6,600	6,600	0	5,800
SN3	0	-600	0	-600	450	0	1,000	2,375	3,125	0	0	3,125
BN4	0	0	0	0	0	1,000	-230	800	1,600	2,200	0	1,600
BN5	0	0	0	0	0	0	-2,230	-2,230	0	0	0	-2,230
BN6	0	0	0	0	0	0	-2,300	-2,300	-1,600	5,600	0	-4,700
BN7	0	22	-60	500	-360	-600	-661	-82	-1,317	6,830	0	-1,317
KOLO	0	0	300	200	200	0	-100	-300	210	2,830	0	210
BN8	0	0	0	0	-600	0	100	-104	-604	0	0	-604
WIL	0	0	0	0	0	0	0	-230	-230	0	0	-230
CEASARS1	0	2,000	-1,100	-600	-2,000	1,100	3,000	-4,500	-1,200	10,000	0	-1,200
DREWS	0	5,400	0	300	-1,200	550	-100	900	4,200	3,700	0	4,200
Total	0	-12,948	-4,361	-2,379	7,582	-21,862	-69,061	-516,963	-248,672	552,650	0	-248,672

GARDENCITYBETS

Accounts Place a Bet Rules Reports

Available: \$82,280

Ticket confirmation

PRINT TICKET GO TO OPEN BETS PLACE ANOTHER BET

WAGER TYPE: STRAIGHT BET

TEAM: [Jan-22-2021] [NBA] - [642] MIN TIMBERWOLVES +6½-110

RISKING / TO WIN: \$2,200 / \$2,000

TICKET: 319232889

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6. The Gerodemos Gambling Organization relied on its agents/bookies to collect payments from losing bettors and to make payments to winning bettors. Collections from, and payments to bettors, were made in Northern District of Indiana and elsewhere in the United States. The agents and bookies repeatedly forwarded money collected from losing bettors to leaders of the Gerodemos Gambling Organization. If certain agents and bookies could not make a complete payment to a winning bettor, the Gerodemos Gambling Organization would cover that payment. The financial relationship between the Gerodemos Gambling Organization and its agents and bookies varied.

7. Members of the Gerodemos Gambling Organization communicated regularly with one another by telephone, by e-mail, by text message, by Zelle, and in-person, to

maintain the orderly operation of the sports betting and the orderly collection of gambling debt. On almost a weekly basis, gambling information would be transmitted by the Gerodemos Gambling Organization as to how much money was either due, or to be collected, from their bettors. This information was usually transmitted via text messaging indicating either the letter M (minus: money owed by the bettor to the Gerodemos Gambling Organization) or P (plus: money owed by the Gerodemos Gambling Organization to the bettor) followed by a specific dollar amount. JAMES GERODEMOS and DEAN GIALAMAS, also directly shared via text messages the split between them for the illegal gambling websites they shared, managed and controlled, as well as certain bettors they split between them:



8. Members of the Gerodemos Gambling Organization often met their agents, bookies, and even some bettors, in-person to collect and/or deliver payments for the sports bets. These meetings often took place inside public buildings and parking lots.

9. Members of the Gerodemos Gambling Organization used businesses operated by

JAMES GERODEMOS, Gino's Steakhouse restaurant located in Merrillville, Indiana, and CHRIS GERODEMOS, Paragon restaurant located in Hobart, Indiana, to facilitate the Gerodemos Gambling Organization. These two establishments were to collect gambling proceeds, payoff winning bettors, and to transfer gambling proceeds between JAMES GERODEMOS and CHRIS GERODEMOS.

10. Members of the Gerodemos Gambling Organization also used employees from both Gino's Steakhouse restaurant and Paragon restaurant to facilitate the collection and distribution of gambling revenue from agents, bookies, and bettors involved with the Gerodemos Gambling Organization. These payments ranged from \$100's of dollars to as much as \$50,000.

11. The Gerodemos Gambling Organization accepted payments from losing bettors in cash, in checks, wire payments, and online money apps (i.e. Zelle). The payments from losing bettors included bettors who lived in the Northern District of Indiana and elsewhere in the United States.

12. The Gerodemos Gambling Organization made payments to winning bettors in cash or by reducing the outstanding amount due from the bettors. The payments to winning bettors included bettors who lived in Northern District of Indiana and elsewhere in the United States.

13. The Gerodemos Gambling Organization allowed gambling payments to be mailed, wired, or transferred via an online money app to the Gerodemos Gambling Organization.

14. Members of the Gerodemos Gambling Organization kept track of their bettors through the illegal online betting sites. Access to these illegal online betting sites was controlled and managed by DEAN GIALAMAS and JAMES GERODEMOS who provided access to these illegal online betting sites to their bookies/bettors.

15. The Gerodemos Gambling Organization made efforts to hide the bookmaking activities of the organization by using various aliases, numerous bank accounts, several business entities, payments disguised as legitimate business expenses or loans, when in reality the payments were transfers of gambling related proceeds or payments of gambling debt.

16. Members of the Gerodemos Gambling Organization provided instructions to bettors on how they should make out checks that were used to pay sports bets. Bettors followed those instructions and made payments for their gambling debt with checks.

17. Members of the Gerodemos Gambling Organization provided instructions on how to pay gambling debts through wire transfers or electronic payment apps which would appear to be legitimate payments for non-gambling related activities.

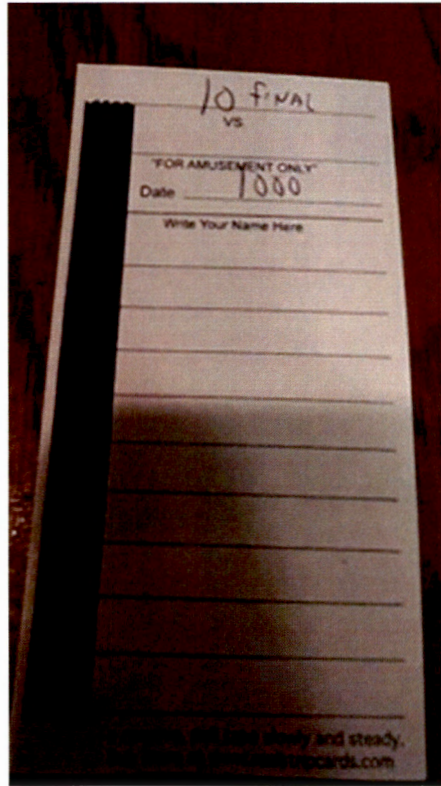
18. Members of the Gerodemos Gambling Organization provided instructions to bettors explaining that gambling debts could be paid by wiring money or transmitting money via an online electronic payment application to Gerodemos family members.

19. Members of the Gerodemos Gambling Organization extended credit to agents, bookies, and bettors as an inducement to become a bettor/bookie in the Gerodemos Gambling Organization. Bookies themselves usually received 25% commission on all of their bettors' losing bets. As an additional incentive to individuals involved in the Gerodemos Gambling Organization, JAMES GERODEMOS promised monetary compensation (50% of the debt collected) to certain individuals if they were successful in collecting back due gambling debts owed to the Gerodemos Gambling Organization by bettors.

Sports Betting with Superbowl Line Pool Cards

20. Another integral part of the Gerodemos' Gambling Organization involved the widespread sale of Superbowl line pool betting cards ranging from \$500 - \$25,000 per line, grossing between \$700,00 – \$900,000 each annual NFL Superbowl game. This involved JAMES GERODEMOS and many of his associates selling/collecting money for these Superbowl line pool cards.

21. These Superbowl Line Pool cards were a gambling instrument used by the Gerodemos Gambling Organization that operated as follows: JAMES GERODEMOS or one of his associates would approach an individual and ask them if they wanted a “line” or “line pool card.” The following is an example of a blank line pool card:



22. The line pool card had 10 blank lines with a black strip to the left of each line. A bettor would buy a line for a fixed price ranging between \$500 and \$25,000. Either the bettor, JAMES GERODMOS, or one of his associates, would place the bettor's name (normally using a nickname or alias, or sometimes even the actual bettors name) on the line. After all the lines were sold and paid for on any given card, JAMES GERODEMOS would remove the black strip revealing a randomized single digit number from 0-9 next to each line. The following is a completed Superbowl Line Pool card (with bettors' names redacted and laying on top of a Gino's Steakhouse restaurant menu):

further the continuance of the Gerodemos Gambling Organization, on April 9, 2026, MICHAEL CAMPBELL, engaged in covert countersurveillance activities in an attempt to locate and discover if the Gerodemos Gambling Organization was under law enforcement investigation as follows:

25. As undercover law enforcement agents were leaving JAMES GERODEMOS on the evening of April 9, 2026, one of the surveillance agents noticed a GMC truck, similar to one driven by MICHAEL CAMPBELL following the undercover agent in an attempt to determine where the undercover was going. (the driver of the GMC vehicle was later positively identified as MICHAEL CAMPBELL) . The undercover agent saw the GMC vehicle also and notified surveillance units. CAMPBELL stayed behind the undercover agent for a few blocks as the undercover agent was heading eastbound on US30. CAMPBELL then moved into the far-left lane. As the undercover agent merged onto the ramp to go southbound on I-65, CAMPBELL made a last second erratic move to cross all three lanes on US 30, to follow the undercover agent as the undercover agent exited U.S. 30 onto the Southbound I-65 entrance ramp. Surveillance units followed CAMPBELL as he traveled southbound I65. CAMPBELL was observed following the undercover agent and driving erratically at speeds in excess of 100 mph. Throughout CAMPBELL's attempts at countersurveillance, Campbell continuously weaved in and out of traffic, approached the rear of one of the surveillance vehicle and began tailgating them and flashing his brights in attempts to catch up to the undercover

agent. During this time frame, As MICHAEL CAMPBELL approached a construction zone, to avoid traffic that was backed up and waiting to enter the construction zone, CAMPBELL activated the emergency amber lights located on the rear tailgate area and in the front grill area to engage in an illegal U-turn on I-65. CAMPBELL'S countersurveillance pursuit lasted from US 30 and I-65 to shortly after the I-65 Lafayette exit and was in excess of one hour. Later, CAMPBELL was observed exiting I-65 Northbound at exit 178 and stopping at a Speedway gas station in West Lafayette. At this time, CAMPBELL was sitting in the black GMC pickup truck and was positively identified as MICHAEL CAMPBELL. The black GMC pickup truck with Indiana license plates was registered to the same labor union that CAMPBELL is a member of. During the occurrence of this event, there were several calls between JAMES GERODEMOS and MICHAEL CAMPBELL.

26. In furtherance and as part of the Gerodemos Gambling Organization business described above:

From in or about January 2021 through on or about April of 2026, both dates being approximate and inclusive, in the Northern District of Indiana and elsewhere, defendants

JAMES L. GERODEMOS a/k/a "Jimmy the Greek"
DEAN GIALAMAS a/k/a "Dean Gem"
CHRIS L. GERODEMOS
BASAM FAWZI IBRAHIM a/k/a "Donny Brasco"
SANAD WALID IBRAHIM a/k/a "Sanad Taka"
PETER PAVLOPOULOS a/k/a "Pete Goodys"

FILIPPO ROVITO a/k/a “Gigi”
MICHAEL D. CAMPBELL a/k/a “Michael Way Out” a/k/a “Chuckie Hoffa”
EHAB MUSTAFA a/k/a “Eddie”
STEVE ARMENTA
SAMUEL A. NUZZO
ALEXANDER G. GAGIANAS a/k/a “Alex Gyros”
GUS KAPORIS a/k/a “Deans Runner
RAMI F. MANSOUR a/k/a “Rami Straight Flush”
NENAD RADOJA a/k/a “Butch Hunkee”
MARCUS VLADIMIR GANZ a/k/a “Vladimir Ganz”
PAUL FRANZE a/k/a “Paulie Scarf”
ATHENA OLGA GERODEMOS
ELIAS CHRIS GERODEMOS
JAMES STREZOVSKI a/k/a/ “Jim Macedonian”
ANDREW NGUYEN a/k/a “Ceasars Andrew”
GIUSEPPE MANZI a/k/a “Joe Polozzo”

and others known and unknown to the grand jury, knowingly and intentionally conducted, financed, managed, supervised, directed and owned all or part of an illegal gambling business, that is, a gambling business involving sports betting, which operated in violation of the laws of the State of Indiana, Title 35, Indiana Code Section, 35-45-5-3, and which involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part of said illegal gambling business, and which remained in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day.

All in violation of Title 18, United States Code, Sections 1955 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT TWO

(Conspiracy Hobbs Act Extortion – VICTIM 1)

From in or about September 2024 through on or about October of 2025, both dates being approximate and inclusive, in the Northern District of Indiana and elsewhere, defendants

**JAMES L. GERODEMOS a/k/a “Jimmy the Greek”
BASAM FAWZI IBRAHIM a/k/a “Donny Brasco”
PETER PAVLOPOULOS a/k/a “Pete Goodys”
EHAB MUSTAFA a/k/a “Eddie”**

together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendants and their co-conspirators agreed to obtain property of VICTIM 1, that is: money belonging to VICTIM 1, with their consent, which consent was to be induced by wrongful use of actual and threatened force, violence and fear.

In furtherance of the above conspiracy, the defendants engaged in the following:

OVERT ACTS

1. After giving VICTIM 1 an extension of credit for illegal gambling, on September 5, 2024, in replying to a text from Victim 1, JAMES GERODEMOS sent Victim 1 the following text, “OK” and “M9820. Deduct after I see Pete.”
2. On September 9, 2024, JAMES GERODEMOS sent Victim 1 the following text: “M8820,” and another text to PETER PAVLOPOULOS, “Please stop by have to pay people.”

3. On September 13, JAMES GERODEMOS texted PETER PAVLOPOULOS, “Please call asap.” In response, PETER PAVLOPOULOS sent JAMES GERODEMOS the following text: “...I’m not avoiding you. I’m trying to get a hold of VICTIM 1. I don’t like the transferring debt that I don’t owe...I can facilitate his money to you...But with a slightly looser deadline...Next week I could clear up majority of it...As for now. I’m still trying to have guy transfer you 1500.”

4. On September 18, 2024, PETER PAVLOPOULOS texted JAMES GERODEMOS, “He hasn’t returned my call yet...If its too high...Shut him down...Til he pays.”

5. On September 23, 2024, at 1:05 pm, JAMES GERODEMOS texted VICTIM 1, “M20389.” At 4:53 pm, VICTIM 1 replied, “...I will get you a wire by Friday latest...” At 4:53 pm, JAMES GERODEMOS replied, “If u want, make a cashiers check to Athena.”

6. October 2, 2024, at 8:53 am, 10:06 am, 11:06 am, 7:20 pm, and 9:35 pm, JAMES GERODEMOS attempted to call VICTIM 1. On October 3, 2024, at 8:29 am, 11:19 am, 2:41 pm, 4:35 pm, JAMES GERODEMOS called VICTIM 1 and got voicemail. At 8:13 JAMES GERODEMOS (from a different cell phone) called VICTIM 1 and got voicemail.

7. On October 14, 2024, JAMES GERODEMOS texted PETER PAVLOPOULOS, “Send me his address. I’ll have somebody to go down there.” PETER PAVLOPOULOS replied, “Take it easy now...He’ll su[r]face.”

8. On October 21, 2024, at 1:33 pm, JAMES GERODEMOS texted VICTIM 1, "M44078, Call me please asap." On October 22, 2024, at 8:08 am, 10:17 am, and 3:17 pm, JAMES GERODEMOS texted VICTIM 1, "???" Really," "Wtf," and "Can u call me[?]"

9. On October 23, 2024, at 9:35 am, JAMES GERODEMOS texted PETER PAVLOPOULOS, "Send me those 2 clowns [VICTIM 1 and another person] address so I can have somebody deliver the gyros to them."

10. On October 26, 2024, at 2:45 pm, JAMES GERODEMOS texted PETER PAVLOPOULOS, "Please send me that guy information his name and everything please...I got somebody down there. I got a guy going down there. Gotta get this straightened out and they don't even answer the fucking call. He's a scumbag."

11. On October 27, 2024, at 10:55 am, PETER PAVLOPOULOS texted JAMES GERODEMOS, "I made a couple of calls yesterday. Don't ask me how I know. But you will be getting an envelope hand delivered latter part of Week."

12. On November 15, 2024, at 10:30 am, JAMES GERODEMOS called VICTIM 1 and got voicemail. At 10:32 am, JAMES GERODEMOS texted PETER PAVLOPOULOS, "I have to pay dean?"

13. On November 29, 2024, at 12:32 pm, JAMES GERODEMOS texted PETER PAVLOPOULOS, "Hey Pete. My buddy is going to Houston next week. Give me his address and stuff. He's gonna stay there for two weeks. Give me that Dick Head VICTIM 1's address and where he lives where he works thank you."

14. At 3:42 pm, JAMES GERODEMOS replied, “Let’s get this guy please. [Too] long.”

15. On December 16, 2024, JAMES GERODEMOS texted VICTIM 1, “M44078.” On December 18, 2024, JAMES GERODEMOS texted PETER PAVLOPOULOS, “I need information please.”

16. On December 21, 2024, at 1:41 pm, JAMES GERODEMOS texted PETER PAVLOPOULOS, “I got Santa Claus going there[.] I want him to meet up with him for Christmas.” On December 28, 2024, at 9:05 pm, JAMES GERODEMOS texted PETER PAVLOPOULOS, “Call me this ain’t going away need to straighten out.”

17. On January 3, 2025, at 9:43 pm, JAMES GERODEMOS attempted to call VICTIM 1. At 9:44:08 pm, JAMES GERODEMOS attempted to call VICTIM 1’s again. At 9:44:48 pm, JAMES GERODEMOS texted an image of VICTIM 1 to VICTIM 1.

18. On January 4, 2025, at 10:14 am, JAMES GERODEMOS texted an individual and stated, “Ur sons da[t]ing VICTIM 1’s daughter ?” At 10:21 m, JAMES GERODEMOS texted PETER PAVLOPOULOS, “VICTIM 1 has a daughter that goes to Valpo.” At 10:23 am, JAMES GERODEMOS texted another individual, “VICTIM 1’s got a nice-looking daughter goes to Valp[o].

19. On that same day, at 12:57 pm, JAMES GERODEMOS called a phone number registered to VICTIM 1 and VICTIM 1’s ex-wife using the *67 prefix. At 1:13 pm, JAMES GERODEMOS called BASAM IBRAHIM for 154 seconds. At 1:39 pm, JAMES GERODEMOS called VICTIM 1 and got voicemail.

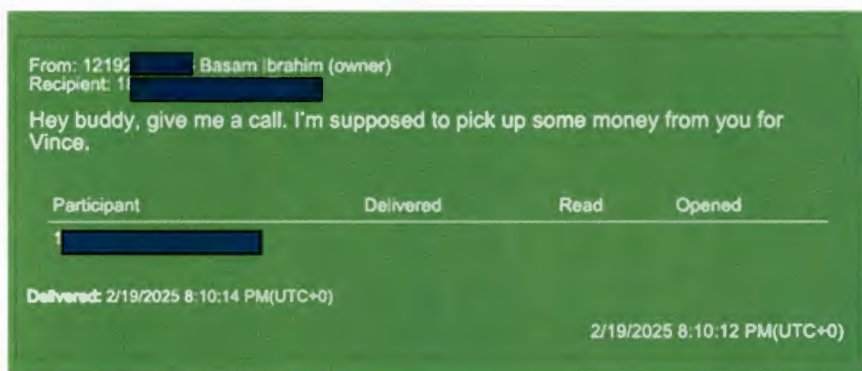
20. On February 17, 2025, JAMES GERODEMOS attempted to call VICTIM 1. At 2:40 pm, JAMES GERODEMOS texted BASAM IBRAHIM, “Find his address in Texas please.” At 2:41 pm, JAMES GERODEMOS called BASAM IBRAHIM for 100 seconds.

21. Later on, February 17, 2025, at 2:44 pm, BASAM IBRAHIM attempted to call VICTIM 1. At 2:46 pm, BASAM IBRAHIM texted JAMES GERODEMOS the Google Maps Street view of VICTIM 1’s home. At 2:52 pm, JAMES GERODEMOS called BASAM IBRAHIM for 137 seconds. At 2:54:09 pm, JAMES GERODEMOS attempted to call VICTIM 1. At 2:54:50 pm, JAMES GERODEMOS called BASAM IBRAHIM for 232 seconds. At 3:12 pm, JAMES GERODEMOS attempted to call VICTIM 1. At 3:16 pm, JAMES GERODEMOS called BASAM IBRAHIM for 34 seconds. At 5:02 pm, JAMES GERODEMOS attempted to call VICTIM 1. At 5:03 pm, JAMES GERODEMOS texted PETER PAVLOPOULOS an image [not visible]. At 5:08 pm, JAMES GERODEMOS called BASAM IBRAHIM for 141 seconds. At 5:34 pm, JAMES GERODEMOS asked PETER PAVLOPOULOS, “Call me, is that his house[?]” At 5:42 pm, BASAM IBRAHIM called JAMES GERODEMOS for 62 seconds. At 5:43 pm, BASAM IBRAHIM attempted to contact VICTIM 1. At 5:43:41 pm, BASAM IBRAHIM attempted to call JAMES GERODEMOS.

22. On February 18, 2025, at 9:24 am, JAMES GERODEMOS attempted to call VICTIM 1. At 11:16 am, PETER PAVLOPOULOS attempted to call VICTIM 1. At 5:44 pm, JAMES GERODEMOS called BASAM IBRAHIM for 251 seconds. At 5:49 pm,

JAMES GERODEMOS attempted to call VICTIM 1. At 7:27 pm, BASAM IBRAHIM asked JAMES GERODEMOS, “What is the plan for tonight[?]” At 8:14 pm, BASAM IBRAHIM attempted to call VICTIM 1. On February 19, 2025, JAMES GERODEMOS and BASAM IBRAHIM attempted to call VICTIM 1.

23. On February 19, 2025, at 8:10 pm, BASAM IBRAHIM texts VICTIM 1:



Calls To VICTIM 1's Daughter

24. On February 20, 2025, at 11:53 am, JAMES GERODEMOS called BASAM IBRAHIM for 67 seconds. At 11:54 am, BASAM IBRAHIM attempted to call VICTIM 1. At 12:09 pm, BASAM IBRAHIM attempted to call JAMES GERODEMOS. At 12:07:54 pm, BASAM IBRAHIM called VICTIM 1's daughter and left the following voice message: “ Hey (**name redacted**) this is uh, Sam. (**name redacted**), if you could please call me when you get a chance. 219-2xx—xxxx.”

25. On March 5, 2025, at 2:17 pm, BASAM IBRAHIM texts VICTIM 1 “Call me please.”

26. On March 8, 2025, JAMES GERODEMOS left a message on VICTIM 1 daughter's phone stating: “ **(Daughter's first name)** Sam, I'm looking for your dad **(VCTIM 1's first name)**. Give me a call. I might stop out to see you tomorrow ... Looking for **(VICTIM 1's first name)**. I'll come and see you tomorrow.”

27. On March 9, 2025, JAMES GERODEMOS left a message on VICTIM 1 daughter's phone stating: “See you soon sweetheart. See you soon...”

28. On March 10, 2025, JAMES GERODEMOS left a message on VICTIM 1 daughter's phone stating: “Hey babe, see you when I come to town in a couple of weeks. This is Berto. See you sweetheart.”

29. JAMES GERODEMOS, BASAM IBRAHIM, and EHAB MUSTAFA, left these additional voice messages on the following dates for VICTIM 1:

- a. 2/21/25 BASAM IBRAHIM states: “VICTIM 1, call me back. Thank you.”
- b. 3/3/25 JAMES GERODEMOS states: “Hey VICTIM 1, 219, if you get a chance, send some guys down to shake my hand. They'll be two guys there, they'll hand you my resume, they know who I am , my resume. I got my resume waiting for you. We already got your resume. All right buddy take care....”
- c. 3/4/25 BASAM IBRAHIM states: “VICTIM 1, this is Sam. VICTIM 1 come on man, give me a call. I'll be in that area soon. Give me a call back buddy.”
- d. 3/5/25 JAMES GERODEMOS states: “Yeh VICTIM 1, its Sam man. I need you to call me, get a hold of me about that 219 situation. Give me a call. I'm

gonna be in Valpo this weekend gonna have some ice cream with a good friend of mine.”

- e. 3/7/25 BASAM IBRAHIM states: “VICTIM 1, this is SAM. VICTIM 1, give me a call.”
- f. 3/8/25 BASAM IBRAHIM in a blocked call stated: “Hey VICTIM 1, VICTIM 1 this is Sam. VICTIM 1 I need you to give me a call back man. It’s very important I speak with you.”
- g. 3/18/25 JAMES GERODEMOS (using an Italian accent) states: “VICTIM 1 call us in. I’m tired of you man. ... You call us! figure this out cuz it’s gonna get stupid. You know my friend. No good. You’re no good. No good. You call me, we talk. Call me.”
- h. 4/23/25 JAMES GERODEMOS states: “ VICTIM 1, give me a call bro, its Jimmy. Its been like 6,7,8 months. Give me a call, because uh. Give me a call buddy. Give me a call. You said give me time, I don’t know how much time you need. Give me a call.”
- i. 8/20/25 EHAB MUSTAFA states: “Hi VICTIM 1, this is Rambo. Give me a call back brother. Thank you. 713-2xx-xxxx. Thank you.”
- j. 10/9/25 JAMES GERODEMOS states: “VICTIM 1. VICTIM 1, give me a call man. Give me a call. I’m gonna go to Valparaiso and fuck your daughter.”

EHAB MUSTAFA

30. On June 2, 2025, JAMES GERODEMOS texted DEAN GIALAMAS a video of EHAB MUSTAFA, (a former cook who worked at Gino’s Steakhouse for JAMES GERODEMOS) delivering to the home of VICTIM 1 in Texas, a Papa John’s Pizza box, along with roses and a note stating, “Do the right thing or I’m heading to Valparaiso University...n’ get a hold of the Greek.” This video was also found in the Apple iCloud video section belonging to VICTIM 1’s daughter.

31. A still image from the above video of the pizza box, flowers, and note was sent to PETER PAVLOPOULOS and found in the Google Drive images section of the iCloud belonging to PETER PAVLOPOULOS:



32. On June 2, 2025, the same date the pizza, flowers, and note were delivered to VICTIM 1 by EHAB MUSTAFA, JAMES GERODEMOS called EHAB MUSTAFA.

33. On June 23, 2025, a second phone of EHAB MUSTAFA, a Tracfone cell phone, was activated for MUSTAFA. The second call made on this newly acquired MUSTAFA cell phone was to JAMES GERODEMOS. The third and fourth calls made on this phone were to VICTIM 1. The fifth call made that day on this phone was to JAMES GERODEMOS.

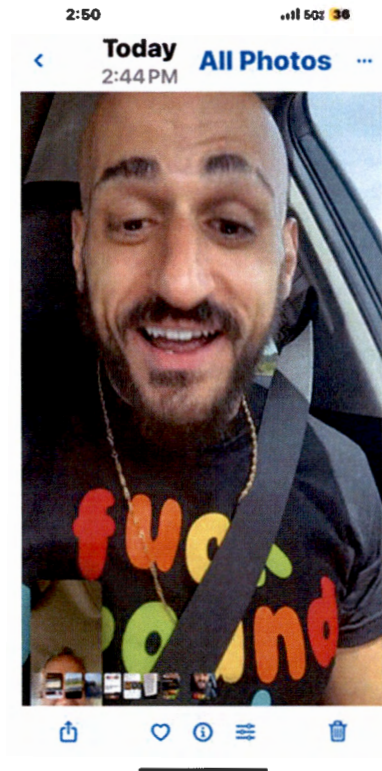
34. On June 25, 2025, at 8:24 am, JAMES GERODEMOS called MUSTAFA for 220 seconds. At 6:18 pm, 6:20 pm, JAMES GERODEMOS called MUSTAFA for 141 seconds, 161 seconds. At 8:03 pm, MUSTAFA attempted to call VICTIM 1 twice. At 9:41 pm, JAMES GERODEMOS called MUSTAFA for 40 seconds.

35. On June 30, 2025, EHAB MUSTAFA went to VICTIM 1's place of business looking for VICTIM 1.

36. On July 21, 2025, DEAN GIALAMAS texted JAMES GERODEMOS "...Total +427318 my way..." JAMES GERODEMOS replied, "More credit." DEAN GIALAMAS asked, "How are you gonna pay all this[?]" On July 22, 2025, DEAN GIALAMAS asked, "Can abc fucking pay us" and "They want their money they won." JAMES GERODEMOS replied, "I will soon."

37. On July 30, 2025, DEAN GIALAMAS texted JAMES GERODEMOS, "I need my Money!" and "Cmon Malaka get me 25k... WTF." A few hours later, JAMES GERODEMOS texted DEAN GIALAMAS a screenshot created that day of EHAB

MUSTAFA, who is wearing a “fuck around and find out” t-shirt facetimeing with JAMES GERODEMOS as depicted below:



38. Minutes after the screenshot was sent of EHAB MUSTAFA, JAMES GERODEMOS texted DEAN GIALAMAS a video (which was recovered from DEAN GIALAMAS’ iCloud) of EHAB MUSTAFA walking up to the home of VICTIM 1 in Texas and speaking with VICTIM 1 as follows:

MUSTAFA: “You know who Dominic is...Dominic man, Dominic, Dominic, uh, good friends of yours, he sent me over here to come talk to you, see if you could give him a call, ‘cause there’s a balance due.” VICTIM 1 responded, “I don’t know Dominic man.”

MUSTAFA: “What’s up with the sports VICTIM 1...Come on VICTIM 1?”

VICTIM 1: “Ah, ah, uh, he fucked me over on that, man that shits not even the right balance so...”

MUSTAFA: “What’s the balance, tell me, tell me ‘cause I’m like the middle guy VICTIM 1. I’m a, I’m a good guy. You’re all good brother.”

VICTIM 1: “I understand. Well, tell him to get the balance right and we’ll work it out.”

MUSTAFA: “What is the balance, so I can tell him?”

VICTIM 1: “I don’t know off the top of my head man.”

MUSTAFA: “Do you want to call him right now? Let me, let me call him right now brother...”

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT THREE

(Conspiracy to Collect Extensions of Credit by Extortionate Means – VICTIM 1)

1. Paragraphs numbered 1-38 of Count 2, entitled “Overt Acts” are adopted and incorporated by reference into this Count of the indictment.
2. From in or about September 2024 through on or about October 2025, both dates being approximate and inclusive, in the Northern District of Indiana and elsewhere, defendants

**JAMES L. GERODEMOS a/k/a “Jimmy the Greek”
BASAM FAWZI IBRAHIM a/k/a “Donny Brasco”
PETER PAVLOPOULOS a/k/a “Pete Goodys”
EHAB MUSTAFA a/k/a “Eddie”**

knowingly conspired and agreed together, and with other co-conspirators known and unknown to the grand jury, to participate in the use of extortionate means to collect an extension of credit made to an individual known to the grand jury and identified here as VICTIM 1.

All in violation of Title 18, United States Code, Section 894(a)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT FOUR

(Hobbs Act Extortion – VICTIM 1)

1. Paragraphs numbered 1-38 of Count 2, entitled “Overt Acts” are adopted and incorporated by reference into this Count of the indictment.

2. From in or about September 2024 through on or about October of 2025, both dates being approximate and inclusive, in the Northern District of Indiana, the defendants

**JAMES L. GERODEMOS a/k/a “Jimmy the Greek”
BASAM FAWZI IBRAHIM a/k/a “Donny Brasco”
PETER PAVLOPOULOS a/k/a “Pete Goodys”
EHAB MUSTAFA a/k/a “Eddie”**

together with others, did knowingly and intentionally attempt to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendants attempted to obtain property of Victim 1, that is: money belonging to VICTIM 1, with his consent, which consent was being induced by wrongful use of actual and threatened force, violence and fear, and aided and abetted in this attempt.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT FIVE

(Collection of Extensions of Credit by Extortionate Means – VICTIM 1)

1. Paragraphs numbered 1-38 of Count 2, entitled “Overt Acts” are adopted and incorporated by reference into this Count of the indictment.

2. From in or about September 2024 through on or about October of 2025, both dates being approximate and inclusive, in the Northern District of Indiana, the defendants

**JAMES L. GERODEMOS a/k/a “Jimmy the Greek”
BASAM FAWZI IBRAHIM a/k/a “Donny Brasco”
PETER PAVLOPOULOS a/k/a “Pete Goodys”
EHAB MUSTAFA a/k/a “Eddie”**

knowingly participated in the use of extortionate means in attempting to collect an extension of credit from an individual known to the grand jury and identified here as VICTIM 1, and aided and abetted in this attempt.

All in violation of Title 18, United States Code, Sections 894(a)(1) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT SIX

(Conspiracy Hobbs Act Extortion – VICTIM 2)

From at least in or about August of 2023 to in and about June 2025, both dates being approximate and inclusive, in the Northern District of Indiana and elsewhere, the defendants

JAMES L. GERODEMOS a/k/a “Jimmy the Greek”

CHRIS GERODMOS

BASAM FAWZI IBRAHIM a/k/a “Donny Brasco”

FILIPPO ROVITO a/k/a “Gigi”

MICHAEL D. CAMPBELL a/k/a “Michael Way Out” a/k/a “Chuckie Hoffa”

ALEXANDER G. GAGIANAS a/k/a “Alex Gyros”

RAMI F. MANSOUR a/k/a “Rami Straight Flush”

JAMES STREZOVSKI a/k/a/ “Jim Macedonian”

together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators agreed to obtain property of VICTIM 2, that is: money belonging to VICTIM 2, with their consent, which consent was to be induced by wrongful use of actual and threatened force, violence and fear.

In furtherance of the above conspiracy, the defendants engaged in the following:

OVERT ACTS

JAMES STREZOVSKI and JAMES GERODEMOS

1. On August 15, 2023, at 3:51 pm, JAMES GERODEMOS texted JAMES STREZOVSKI , “Abcwagering.ag, Username Qr8460, Password (VICTIM 2)

18887702387, My number 219xxxxxxx.” At 8:10 pm, JAMES STREZOVSKI texted, “Don’t fuck around, this guy is a whale.” JAMES GERODEMOS replied, “It’s done.”

2. On August 16, 2023, At 1:07 pm, JAMES GERODEMOS texted JAMES STREZOVSKI, “Minus 9978.” JAMES STREZOVSKI responded, “I texted him to send cashiers check, hasn’t responded.”

3. On September 13, 2023, at 2:50 pm, JAMES STREZOVSKI texted JAMES GERODEMOS, “...maybe need to go fly down there [Florida] and have a face-to-face. Maybe he doesn’t understand the conversation.” On September 14, 2023, at 8:22 am, a person listed in JAMES GERODEMOS’ contacts as “xxx Hollywood” texted him, “Tell him to bring the whole 30[,] fuck that[,] he’s trying to bail himself out he’s playing games with you.” On September 17, 2023, at 12:50 pm, JAMES GERODEMOS texted JAMES STREZOVSKI, “Showtime.” At 12:51 pm, JAMES GERODEMOS texted, “Call me asap.”

4. On November 20, 2023, at 7:07 am, JAMES GERODEMOS texted JAMES STREZOVSKI, “Call this jackoff. I’ll Send Hana’s to his house. I’m done talking to him! Tell him I got ur money hostage.” At 4:38 pm, JAMES GERODEMOS texted JAMES STREZOVSKI an image [not visible]. At 5:32 pm, JAMES GERODEMOS texted JAMES STREZOVSKI another image [not visible] and stated, “Ask VICTIM 2 what size he wears!” At 6:09 pm, JAMES GERODEMOS texted JAMES STREZOVSKI, “I ordered that for VICTIM 2. I need his address.”

5. At 7:11 pm, JAMES STREZOVSKI replied, "You bro wtf take it easy." JAMES GERODEMOS replied, "Fuck him" and "Fucken piece of sh[i]t." At 7:15 pm, JAMES STREZOVSKI texted JAMES GERODEMOS, "I talked to him. I'm not gonna keep calling him every fucking two seconds. I talk to him he said he was gonna deposit some money and give me the rest of it in cash." At 7:39 pm, JAMES GERODEMOS replied, "Ok." At 7:48 pm, JAMES STREZOVSKI texted JAMES GERODEMOS, "If he doesn't deposit within the next couple days tha[n] I'm gonna get on him."

6. On November 24, 2023, at 9:15 am, JAMES GERODEMOS texted JAMES STREZOVSKI, "Did he send u anything[?]" At 9:42 am, JAMES STREZOVSKI replied, "No." At 10:44 am, JAMES GERODEMOS replied, "Keep on him." At 3:35 pm, JAMES GERODEMOS texted, "Keep on that cocksucker" and "Tell him I thought u we're paying me!!"

7. On November 28, 2023, at 1:17 pm, VICTIM 2 called JAMES STREZOVSKI for 203 seconds. At 1:57 pm, JAMES GERODEMOS called JAMES STREZOVSKI for 567 seconds. On November 30, 2023, at 9:32 am, VICTIM 2 called JAMES STREZOVSKI for 128 seconds.

8. On December 1, 2023, at 8:16 am, JAMES GERODEMOS texted JAMES STREZOVSKI, "Get paid from That cocksucker or I'm going to make nick make me his Kum Pika!!" JAMES GERODEMOS then texted an image [not visible] and at 8:17 am texted, "That's What VICTIM 1's ass is going to look like when I have the nigger fuck him!"

9. On December 4, 2023, at 6:41 am, 10:18 am, and 10:29 am, JAMES GERODEMOS and JAMES STREZOVSKI spoke for 78 seconds, 181 seconds, 220 seconds, respectively. At 10:36 am, VICTIM 2 texted JAMES GERODEMOS, “You guys keep t[h]reating me, Again and again, I’m paying what I have to pay, To james, I file a police report on all the [threats] that you guys making, To me no problem, When you involve families is another situation, You guys didn’t give me any other option, To file a police report.” At 10:37 am, JAMES GERODEMOS replied, “See u soon my friend...They already got your number bro they already give me report 411 on you no good...”

10. On January 29, 2024, at 10:37 am, 10:43 am, and 10:54 am, JAMES GERODEMOS and VICTIM 2 spoke for 71 seconds, 49 seconds, and 67 seconds, respectively. At 10:56 am, VICTIM 2 texted JAMES GERODEMOS, “I Meet you anywhere no problem, Don’t want all The ppl around us[,] I get you[,] it no problem.” At 11:19 am, JAMES GERODEMOS replied, “Let’s meet tonight.” At 11:19 am and 11:24 am, VICTIM 2 replied, “Yes sir” and “B4 tonight.” At 3:43 pm and 3:44 pm, JAMES GERODEMOS attempted to call VICTIM 2. At 9:15 pm, VICTIM 2 texted JAMES GERODEMOS, “Jimmy I didn’t forget ab[o]ut you...I text you now. Give me an acct I will transfer you the money...10000\$.” At 9:16 pm, JAMES GERODEMOS replied, “Acct number [account number]... Wells Fargo...SANAD IBRAHIM.” Based on subsequent text messages, VICTIM 2 did not provide a wire transfer.

11. On January 30 and 31, February 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 23, 24, 25, 26, 27, 28, and 29, March 1, 2, and 4, 2025, JAMES GERODEMOS called VICTIM 2.

12. On March 8, 2024, at 8:13:08 am, JAMES GERODEMOS texted VICTIM 2, "Call me." At 8:13:15 am, JAMES GERODEMOS called DEAN GIALAMAS 163 seconds. At 8:17:09 am, JAMES GERODEMOS attempted to call VICTIM 2 and then at 8:17:42 am texted, "This is getting old."

13. On March 9, 2024, at 7:51 pm, JAMES GERODEMOS attempted to call VICTIM 2. At 7:53 pm, JAMES GERODEMOS called BASAM IBRAHIM for 361 seconds. At 8:05 pm, JAMES GERODEMOS texted VICTIM 2, "Call me." At 8:38 pm, JAMES GERODEMOS texted VICTIM 2, "My friend will be down there Monday for a month make sure u see him he's 7 minutes away from u call him he will come and see u." At 8:41 pm, JAMES GERODEMOS texted VICTIM 2, "Call me."

14. On March 11, 2024, at 9:38 am, JAMES GERODEMOS called VICTIM 2 for 44 seconds. At 11:03 am, JAMES GERODEMOS texted VICTIM 2, "My guy is available anytime[,] To[,] Meet with him soon[,] I have to pay him for the remodel job." At 11:17 am, JAMES GERODEMOS called VICTIM 2 for 69 seconds.

15. On March 13, 2024, at 11:54 am, VICTIM 2 called JAMES GERODEMOS for 97 seconds. At 11:55 am and 11:56 am, JAMES GERODEMOS and VICTIM 2 spoke for 24 seconds and 42 seconds, respectively. At 11:57 am, VICTIM 2 texted JAMES GERODEMOS, "Just to let you know, That's you're t[h]reating me [doesn't] help

anyone, And if something happen to me it's all under you're responsibility." At 11:58:27 am, JAMES GERODEMOS replied, "What would happen to you[?] you're a straight shooter, nothing ever is gonna happen to your straight guy, you don't fuck nobody, why would everything happen to you my friend, you're straight." At 11:58:57 am, VICTIM 2 replied, "He just call me, And you just say that you know where to find me." At 12:00 pm, VICTIM 2 texted, "Then I just letting you know if something happen to me or someone in my family, like you send me before my wife, all this t[h]reats making me believe that my life is in danger... You will get you're money when I will have it... Until then it's all under you're responsibility." At 12:02 pm, VICTIM 2 called JAMES GERODEMOS for 216 seconds. At 12:09 pm, VICTIM 2 texted, "We can meet up, me and you, on April 15... You will get money." At 12:10 pm, VICTIM 2 texted, "I don't call no one else th[a]n you and I'm not meeting no one else th[a]n you jimmy... I have to pay the bank back for the money I borrowed u at the casino." At 12:24 pm, JAMES GERODEMOS called JAMES STREZOVSKI for 244 seconds. At 1:11 pm, MICHAEL CAMPBELL called JAMES GERODEMOS for 817 seconds. At 1:31 pm, JAMES GERODEMOS called JAMES STREZOVSKI for 344 seconds. At 1:37 pm, 1:39 pm, and 1:50 pm, JAMES GERODEMOS called BASAM IBRAHIM for 60 seconds, 79 seconds, and 277 seconds, respectively.

16. On March 14, 2024, JAMES GERODEMOS texted VICTIM 2, "I never deposit those checks because there were no good the bank told me you don't have no money in your account, the lady says he's not like you Jimmy." On March 18, 2024, at

3:25 pm, JAMES GERODEMOS texted VICTIM 2, “Let me know so Vince can stop by please very important.”

17. On April 16, 2024, at 8:45 am, JAMES GERODEMOS attempted to call VICTIM 2. At 8:46 am, JAMES GERODEMOS attempted to call RAMI MANSOUR. At 8:53 am, At 10:57 am, VICTIM 2 attempted to call JAMES GERODEMOS. At 10:58:06 am, JAMES GERODEMOS asked VICTIM 2, “Can I call you later?” At 10:58 am and 10:59:06 am, VICTIM 2 replied, “No later...Now we talk...For the last [time]...After this phone call that I just got, no need to talk again...Just to let you know that my life it’s in you’re hands...Anything will happen to me, You are responsible.” At 10:59:09 am, JAMES GERODEMOS replied, “7 month anniversary.” At 11:00 am and 11:01 am, VICTIM 2 replied, “You can sent the gangster to my family like he just call me and did...All recorded...I don’t have business with no one that calm and t[h]reat me...After we spoke this morning...Then if he want to come kill me, No problem...Just to let you know anything happen to me Or my family, It’s in you’re hands...And no choice then going to the police and put this things on file.” At 11:01:47 am and 11:02 am, JAMES GERODEMOS texted VICTIM 2, “Who is this?” and “U f[u]cked so many peoples.” At 11:03 am and 11:04 am, VICTIM 2 texted GERODEMOS, “You’re gangster contractor, or whoever you sent...And I talk to him nice[,] but again the gangster things.” At 11:07:11 am, 11:07:17 am, 11:07:25 am, 11:07:41 am, 11:07:46 am, 11:07:53 am, 11:07:58 am, and 11:08:05 am, JAMES GERODEMOS replied, “7 mont[h]s” each time. At 11:07:58 am and 11:08:20 am, VICTIM 2 texted JAMES

GERODEMOS, “Then take 20000...Not 30 like you want...And let’s settle...it...And get it done...20k...And that’s it.” At 11:08:30 am, JAMES GERODEMOS replied, “Give it to him.” At 11:08:38 am, 11:08:42 am, and 11:08:49 am, VICTIM 2 replied, “No...I’m talking to you only...No middle man.” At 11:08:50 am, JAMES GERODEMOS asked, “Where is it?” At 11:08:52 am, SANAD IBRAHIM called JAMES GERODEMOS for 194 seconds. At 11:08:58 am, 11:09 am, and 11:10 am, VICTIM 2 replied, “Call me, We settle it, Done...In 10 min... Waiting for you[r] call...20 k, 2 weeks from today, And we done all this is my offer, Next week, 5000, 2 weeks 15000...And we done... You give me 18 From 42, I’m giving you 20 from the 30 that you want...Up to you j[i]mmy.” At 11:11 am, VICTIM 2 attempted to call JAMES GERODEMOS. At 11:12 am, JAMES GERODEMOS replied, “That’s fine.”

18. On April 30, 2024, RAMI MANSOUR sent JAMES GERODMOS text messages screen captures indicating that RAMI MANSOUR was at the casino in Florida where VICTIM 2 was known to gamble as follows.



19. Approximately one hour later, JAMES GERODEMOS sent two photos of VICTIM 2 to RAMI MANSOUR. The first picture was a screen capture of VICTIM 2's driver's license. The second picture was a screen capture of JAMES GERODEMOS face-timing with VICTIM 2:



20. May 1, 2024, at 10:25 am and 10:41 am, JAMES GERODEMOS called RAMI MANSOUR for 529 seconds and 168 seconds, respectively. At 10:45 am, JAMES GERODEMOS called RAMI MANSOUR for 787 seconds, where JAMES GERODEMOS joined VICTIM 2 into a multiparty call at 10:55 am for 165 seconds. At 10:58 am, JAMES GERODEMOS called RAMI MANSOUR for 619 seconds. On May 13, 2024, at 11:21 am, JAMES GERODEMOS called VICTIM 2 for 48 seconds, at 11:22 am, JAMES GERODEMOS called RAMI MANSOUR for 165 seconds. On May 16, 2024, at 10:50 am, JAMES GERODEMOS called VICTIM 2 for 189 seconds.

21. On May 21, 2024, at 4:29 pm and 4:37 pm, JAMES GERODEMOS texted VICTIM 2, "I'll be in Florida next week" and "Sun thru Wednesday [May 26 through 30]." At 4:38 pm, VICTIM 2 texted, "I'm seeing Monday...The 27th...We get it straight."

22. On May 26, 2024, JAMES GERODEMOS texted VICTIM 2, "I'm in Tampa." There was no reply. On May 28, 2024, at 7:45 am, JAMES GERODEMOS texted VICTIM 2, "I'm waiting for today." At 7:47 am and 7:48 am, VICTIM 2 replied, "Good morning buddy...Going to the bank at 10 am." At 8:24 am, JAMES GERODEMOS replied, "For sure." At 10:28 am and 10:32 am, VICTIM 2 texted, "In the back boss" and an image [not visible]. At 2:00 pm and 2:15 pm, JAMES GERODEMOS asked, "U coming?" and "???" At 2:15 pm, VICTIM 2 replied, "I call you in 1 hr getting in clear taking the cash to you." At 6:59 pm, JAMES GERODEMOS replied, "Don't wast[e] my time." At 7:00 pm, VICTIM 2 replied, "Never man[,] I deposit you in the am to the acct you give me." At 7:39 pm, 8:23 pm, and 8:32 pm, JAMES GERODEMOS replied, "Yep," "Call me asap," and "Very disrespectful."

23. On June 13, 2024, at 8:19 am, 8:55 am, and 9:23 am JAMES GERODEMOS texted VICTIM 2, "Are you still at the bank? Send me something, bro," "My friends stopping by to see u," and "Real standup guy, my friend."

24. On June 18, 2024, RAMI MANSOUR sends the contact information for VICTIM 2's business to JAMES GERODEMOS

25. On June 18, 2024, RAMI MANSOUR sends the contact information for VICTIM 2's business to JAMES GERODEMOS

26. On June 22, 25, and 28, 2024, JAMES GERODEMOS sent texts to VICTIM 2 indicating that he wants VICTIM 2 to ZELLE him money.

27. On August 17, 2024, at 10:55 am and 11:01 am, JAMES GERODEMOS texted VICTIM 2, "Really?...Wtf" and "Go to the fucken bank," and "Ur wearing me down it's about to come to an end my friend."

28. On August 19, 2024, at 8:45 am, VICTIM 2 texted JAMES GERODEMOS, "I'm gonna call you at midday." JAMES GERODEMOS replied, "Take care of it I don't need a call...I'm old school my friend." At 11:11 pm, JAMES GERODEMOS attempted to call VICTIM 2. At 11:12 pm, JAMES GERODEMOS texted VICTIM 2, "Answer your phone you disrespectful fucking Jew:"

29. On August 20, 2024, at 8:08 am, VICTIM 2 attempted to call JAMES GERODEMOS. At 8:09 am, 8:11 am, and 8:13 am JAMES GERODEMOS attempted to call ATHENA GERODEMOS. At 8:15 am, ATHENA GERODEMOS called JAMES GERODEMOS for 46 seconds. At 8:19 am, JAMES GERODEMOS texted VICTIM 2, "[SANAD IBRAHIM's cell phone number], Sam." At 8:30 am, JAMES GERODEMOS called VICTIM 2 for 130 seconds. At 8:35 am, JAMES GERODEMOS attempted to call ATHENA GERODEMOS. At 8:36 am, ATHENA GERODEMOS attempted to call VICTIM 2. At 9:12 am, JAMES GERODEMOS attempted to call VICTIM 2. At 12:01 pm, JAMES GERODEMOS called JAMES STREZOVSKI for 136 seconds.

30. On September 3, 2024, at 8:47 am, 10:14 am, and 11:22 am, JAMES GERODEMOS called VICTIM 2 and got voicemail. At 11:24 am, JAMES GERODEMOS texted VICTIM 2, “This is not fucken good one mother fucken year?” At 1:27 pm and 4:28 pm, JAMES GERODEMOS attempted to call VICTIM 2. At 5:26 pm, VICTIM 2 attempted to call JAMES GERODEMOS. At 5:28 pm, 6:00 pm, 6:04 pm, and 6:05 pm, JAMES GERODEMOS attempted to call VICTIM 2. At 6:05 pm, JAMES GERODEMOS texted, “Answer ur fucken phone.”

31. Later on, September 3, 2024, at 6:20 pm, JAMES GERODEMOS called JAMES STREZOVSKI for 88 seconds. At 6:28 pm, JAMES GERODEMOS called VICTIM 2 for five minutes, 42 seconds. At 6:54 pm, VICTIM 2 texted, “Man you don’t have to talk this way even that you hate the Jewish ppl, You Keep it for you’re self, And to say they right ab[o]ut what’s happen in October 7 !!!, And they right ab[o]ut Killing raping and burn Kids baby’s girls woman’s !!! This is now between you and God.” At 6:55 pm and 6:56 pm, VICTIM 2 texted, “The other things that you wish my mom to die it’s fine...”

32. At 6:58:04 pm and 6:58:26 pm, JAMES GERODEMOS texted VICTIM 2. At 7:32 pm, JAMES GERODEMOS called VICTIM 2 and got voicemail. At 7:35 pm, JAMES GERODEMOS texted, “I’ll Donate 10 million to the Palastine’s because there 100 percent legit.” At 8:02 pm, JAMES GERODEMOS attempted to call VICTIM 2. At 9:14 pm, JAMES GERODEMOS attempted to call VICTIM 2.

Searching for VICTIM 2 in Florida Casino – ROVITO and CHRIS

GERODEMOS

33. On September 19, 2024, at 10:15 am, JAMES GERODEMOS (while CHRIS GERODEMOS was in Florida) texted CHRIS GERODEMOS an image [not visible] and “Plays in the high limit baccarat.” CHRIS GERODEMOS replied, “Who’s this[?]” JAMES GERODEMOS replied, “He’s name is VICTIM 2...He’s always there...Scumbag.” CHRIS GERODEMOS asked, “What do you want me to tell him[?]” JAMES GERODEMOS replied, “See if u see him in there the high limit, tell him call jimmy.”

34. On October 31, 2024, at 4:23 pm, CHRIS GERODEMOS texted FILIPPO ROVITO while ROVITO was in Florida. At 4:29 pm and 4:31 pm, FILIPPO ROVITO sent a group text that included CHRIS GERODEMOS.

35. On November 1, 2024, at 3:09 pm, CHRIS GERODEMOS called FILIPPO ROVITO for one minute, 47 seconds. At 5:27 pm, JAMES GERODEMOS texted FILIPPO ROVITO an image [not visible] and “If u see this scumbag at the Hardrock his name is VICTIM 2 plays high limit baccarat everyday owes me 30k if u can get it take half.” At 6:45 pm, JAMES GERODEMOS texted FILIPPO ROVITO, “Hangs around a big player there named Hugo big baccarat player very well respected.” At 11:27 pm, JAMES GERODEMOS texted FILIPPO ROVITO, “Any luck?” At 11:28 pm, FILIPPO ROVITO replied, “On my way.”

36. On November 2, 2024, at 7:50 am, FILIPPO ROVITO texted, “I took a walk around nobody around.” At 10:51 am, JAMES GERODEMOS texted, “VICTIM 2 should be there tonight for sure.” At 1:32 pm and 1:56 pm, JAMES GERODEMOS texted VICTIM 2 an image [not visible]. At 4:35 pm, FILIPPO ROVITO called CHRIS GERODEMOS for one minute, 53 seconds. At 7:31 pm, FILIPPO ROVITO texted an image [not visible]. At 7:33 pm, JAMES GERODEMOS replied, “No, put ur glasses on.” At 7:34 pm, JAMES GERODEMOS texted an image [not visible] and “He’s got a face only a mother could love!” At 7:54 pm, JAMES GERODEMOS texted an image [not visible] and “Call him from a Florida number if u can.” At 11:14 pm, CHRIS GERODEMOS texted JAMES GERODEMOS, “Send a picture...Of that guy.” At 11:15 pm and 11:16 pm, JAMES GERODEMOS sent three images [not visible].

37. On November 3, 2024, at 3:43 am and 3:44 am, JAMES GERODEMOS texted VICTIM 2 an image [not visible]. At 8:23 am, CHRIS GERODEMOS texted JAMES GERODEMOS, “He wasn’t there last night we looked everywhere.” JAMES GERODEMOS replied, “Ok Ty.”

ALEX GAGIANAS Attempts to Reach VICTIM 2

38. On November 13, 2024, ALEX GAGIANAS, using *67 to block his phone number, at 9:31 PM GAGIANAS called VICTIM 2 for 78 seconds.

39. On November 13, 2024, ALEX GAGIANAS conducted a Google search for VICTIM 2’s business in Florida.

40. On November 13, 2024, ALEX GAGIANAS did a screen capture of the Facebook page for VICTIM 2's wife.

41. On November 13, 2024, ALEX GAGIANAS obtained a screen capture of VICTIM 2's driver's license taken from another person's phone.

MICHAEL CAMPBELL Sends Information about VICTIM 2

42. On November 4, 2024, at 11:10 am, JAMES GERODEMOS called JAMES STREZOVSKI for 511 seconds. At 12:45 pm, JAMES GERODEMOS texted MICHAEL CAMPBELL, "(VICTIM 2 first name), Florida...(VICTIM 2 last name." At 12:45 pm, MICHAEL CAMPBELL replied, "?" At 1:19 pm, JAMES GERODEMOS texted MICHAEL CAMPBELL a YouTube clip titled Out For Justice – Steven Seagal – Anybody Seen Richie?, At 1:51 pm, MICHAEL CAMPBELL texted contact detailed information for VICTIM 2's business identifying VICTIM 2 as the President, and VICTIM 2's date of birth. At 1:53 pm, MICHAEL CAMPBELL texted VICTIM 2's current address in Florida and information about his Condo. At 1:56 pm, JAMES GERODEMOS replied, "More Ple[a]se...Print out." At 1:56 pm, MICHAEL CAMPBELL added a previous address for VICTIM 2 and "That's all I got."

43. On June 13, 2025, JAMES GERODEMOS and others went to FILIPPO ROVITO's restaurant, Capri, in Burr Ridge, Illinois. JAMES GERODEMOS told a group of people that he was with at Capri's about VICTIM 2 in Florida that owed him money. JAMES GERODEMOS told the group he was talking to his brother, CHRIS GERODEMOS about it, when FILIPPO ROVITO called JAMES GERODEMOS on the

phone and asked, “What’s this motherfucker look like?” JAMES GERODEMOS explained that VICTIM 2 goes to the Hard Rock in Fort Lauderdale all the time. Someone in the group asked JAMES GERODEMOS if he ever got him and JAMES GERODEMOS said no. However, JAMES GERODEMOS went on to state that FILIPPO ROVITO was at the Hard Rock in Fort Lauderdale and Facetimed JAMES GERODEMOS walking up to every bald guy he saw and asking if they were “VICTIM 2” and when they would respond that they weren’t, and FILIPPO ROVITO would walk away. JAMES GERODEMOS told the group that CHRIS GERODEMOS asked what FILIPPO ROVITO was doing and JAMES GERODEMOS explained that FILIPPO ROVITO was looking for “VICTIM 2.”

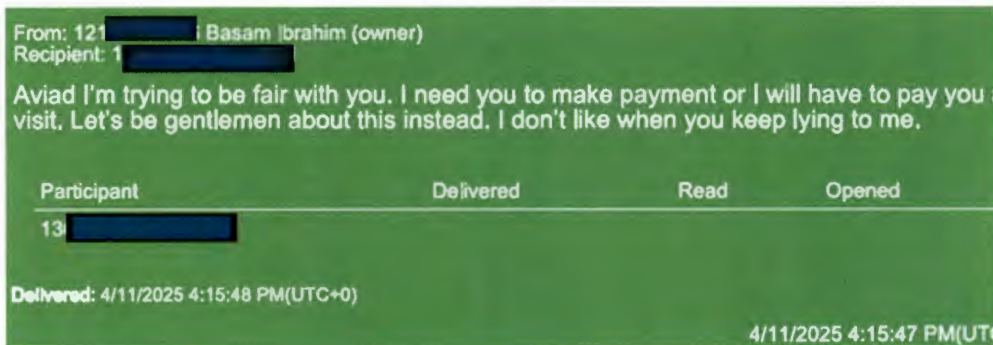
44. Additionally, during this same conversation, and to induce others to collect debts for him, JAMES GERODEMOS told the group that he had told CHRIS GERODEMOS that FILIPPO ROVITO would get half of the money and that FILIPPO ROVITO said he was going to knock VICTIM 2’s lights out and shove his head into a machine. JAMES GERODEMOS told the group “the guy (Rovito) is nuts” and that FILIPPO ROVITO kept sending JAMES GERODEMOS pictures and asking if “that was him.”

BASAM IBRAHIM and VICTIM 2

45. On or about February 5, 2025, BASAM IBRAHIM sent VICTIM 2 a text stating that he (BASAM IBRAHIM) would be picking up “30K” from VICTIM 2 at a specific address.

46. On February 11, 2025, BASAM IBRAHIM sent the following text to VICTIM

2:



47. On February 13, 2025, BASAM IBRAHIM sent a text to MICHAEL CAMPBELL directing CAMPBELL to take a video of VICTIM 2's residence and that BASAM IBRAHIM would "do the rest."

48. On or about February 16, 2025, BASAM IBRAHIM received a P2P electronic payment for \$1,000 from VICTIM 2 and later sent half of what he collected from VICTIM 2 (\$500) to JAMES GERODEMOS.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT SEVEN

(Conspiracy to Collect Extensions of Credit by Extortionate Means – VICTIM 2)

1. Paragraphs numbered 1-48 of Count 6, entitled “Overt Acts” are adopted and incorporated by reference into this Count of the indictment.

2. From at least in or about August of 2023 to in and about June 2025, both dates being approximate and inclusive, in the Northern District of Indiana and elsewhere, the defendants

JAMES L. GERODEMOS a/k/a “Jimmy the Greek”

CHRIS GERODEMOS

BASAM FAWZI IBRAHIM a/k/a “Donny Brasco”

FILIPPO ROVITO a/k/a “Gigi”

MICHAEL D. CAMPBELL a/k/a “Michael Way Out” a/k/a/“Chuckie Hoffa”

ALEXANDER G. GAGIANAS a/k/a “Alex Gyros”

RAMI F. MANSOUR a/k/a “Rami Straight Flush”

JAMES STREZOVSKI a/k/a/ “Jim Macedonian”

knowingly conspired and agreed together, and with other co-conspirators known and unknown to the grand jury, to participate in the use of extortionate means to collect an extension of credit made to an individual known to the grand jury and identified here as VICTIM 2.

All in violation of Title 18, United States Code, Section 894(a)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT EIGHT

(Hobbs Act Extortion – VICTIM 2)

1. Paragraphs numbered 1- 48 of Count 6, entitled “Overt Acts” are adopted and incorporated by reference into this Count of the indictment.

2. From at least in or about August of 2023 to in and about June 2025, both dates being approximate and inclusive, in the Northern District of Indiana and elsewhere, the defendants

JAMES L. GERODEMOS a/k/a “Jimmy the Greek”

CHRIS GERODMOS

BASAM FAWZI IBRAHIM a/k/a “Donny Brasco”

FILIPPO ROVITO a/k/a “Gigi”

MICHAEL D. CAMPBELL a/k/a “Michael Way Out” a/k/a/“Chuckie Hoffa”

ALEXANDER G. GAGIANAS a/k/a “Alex Gyros”

RAMI F. MANSOUR a/k/a “Rami Straight Flush”

JAMES STREZOVSKI a/k/a/ “Jim Macedonian”

together with others, did knowingly and intentionally attempt to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendants and their co-conspirators attempted to obtain property of VICTIM 2, that is: money belonging to VICTIM 2, with his consent, which consent was being induced by wrongful use of actual and threatened force, violence and fear, and aided and abetted such extortion and attempted extortion.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT NINE

(Collection of Extensions of Credit by Extortionate Means – VICTIM 2)

1. Paragraphs numbered 1- 48 of Count 6, entitled “Overt Acts” are adopted and incorporated by reference into this Count of the indictment.

2. From at least in or about August of 2023 to in and about June 2025, both dates being approximate and inclusive, in the Northern District of Indiana and elsewhere, the defendants

JAMES L. GERODEMOS a/k/a “Jimmy the Greek”

CHRIS GERODEMOS

BASAM FAWZI IBRAHIM a/k/a “Donny Brasco”

FILIPPO ROVITO a/k/a “Gigi”

MICHAEL D. CAMPBELL a/k/a “Michael Way Out” a/k/a “Chuckie Hoffa”

ALEXANDER G. GAGIANAS a/k/a “Alex Gyros”

RAMI F. MANSOUR a/k/a “Rami Straight Flush”

JAMES STREZOVSKI a/k/a/ “Jim Macedonian”

knowingly participated in the use of extortionate means in attempting to collect an extension of credit from an individual known to the grand jury and identified here as VICTIM 2, and aided and abetted such collection and attempted collection.

All in violation of Title 18, United States Code, Sections 894(a)(1) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT TEN
(Hobbs Act Extortion – VICTIM 3)

1. From in or about February 2024 through on or about July 2024, both dates being approximate and inclusive, in the Northern District of Indiana, the defendant

JAMES L. GERODEMOS a/k/a “Jimmy the Greek”

did knowingly and intentionally attempt to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators attempted to obtain property of VICTIM 3, that is: money belonging to VICTIM 3 with his consent, which consent was being induced by wrongful use of actual and threatened force, violence and fear.

2. In furtherance of this attempt to collect an illegal gambling debt by extortion, JAMES GERODEMOS sent the following text messages on the following dates to VICTIM 3:

DATE	TEXT MESSAGE
2/6/24	“Can I get paid”
2/20/24	“Still no money???”
2/24/24	“No response I take it that I’m not getting paid!” “I’ll get it one way or another”

	<p>“No doubt about that”</p> <p>“Watch”</p>
2/27/24	<p>“U collected 118k</p> <p>And I can’t get my 7500 that’s nonsense but I will get it one way or another I promise</p>
4/1/24	<p>“M7498”</p>
4/9/24	<p>“U owe my buddy dean to ur fucked my friend!!</p> <p>“How many people did u fuck!!”</p> <p>“U fucken piece of shit I hope he fucks ur mother u jacckkkoff!!”</p> <p>“U will find out who his uncle is u fucken gook!”</p> <p>“Don’t worry he’ll fuck u scamming mother fucken”</p> <p>“U fucked dean over 200 k”</p> <p>“Scumbag stick that in ur mothers pussy when he fucks u u don’t pay u fucken gook”</p>
7/5/24	<p>“Still No pay”</p>
7/10/24	<p>“I had a dream ur mother died”</p> <p>“When she dies I’ll dig her up and fuck her in the ass!”</p> <p>“Ur getting exposed u scumbag”</p> <p>“I do it all suck dixk with love ? Gotcha”</p> <p>“Fucken jackoff”</p> <p>“Piece of shit”</p> <p>“Did ur mother die yet im praying everyday she does!”</p>

In violation of Title 18, United States Code, Sections 1951(a).

THE GRAND JURY FURTHER CHARGES:

COUNT ELEVEN

(Collection of Extensions of Credit by Extortionate Means – VICTIM 3)

1. Paragraph 2 of Count 10 is adopted and incorporated by reference into this Count of the indictment.

2. From in or about February 2024 through on or about July 2024, both dates being approximate and inclusive, in the Northern District of Indiana and elsewhere, defendant

JAMES L. GERODEMOS a/k/a “Jimmy the Greek”

knowingly participated in the use of extortionate means in attempting to collect an extension of credit from an individual known to the grand jury and identified here as Victim 3.

All in violation of Title 18, United States Code, Sections 894(a)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT TWELVE
(Hobbs Act Extortion – VICTIM 4)

1. In or about July 2024, in the Northern District of Indiana and elsewhere, the defendant

JAMES L. GERODEMOS a/k/a “Jimmy the Greek”

did knowingly and intentionally attempt to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and his co-conspirators attempted to obtain property of Victim 4, that is: money belonging to VICTIM 4 with his consent, which consent was being induced by wrongful use of actual and threatened force, violence and fear.

2. In furtherance of this attempt to collect an illegal gambling debt by extortion, **JAMES GERODEMOS** sent the following text messages on the following dates to VICTIM 4:

DATE	TEXT MESSAGE
1/26/22	“Call me please” “M24776” “When can I see you” “Call me ASAP”
7/9/24	“I heard ur mother died good!”

7/10/24	“I’m so glad ur mother died” “I wanted to dig her up and fuck her” “I’m exposing u”
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All In violation of Title 18, United States Code, Sections 1951(a).

THE GRAND JURY FURTHER CHARGES:

COUNT THIRTEEN

(Collection of Extensions of Credit by Extortionate Means – VICTIM 4)

1. Paragraph 2 of Count 12 is adopted and incorporated by reference into this Count of the indictment.

2. In or about July 2024, in the Northern District of Indiana and elsewhere, defendant

JAMES L. GERODEMOS a/k/a “Jimmy the Greek”

knowingly participated in the use of extortionate means in attempting to collect an extension of credit from an individual known to the grand jury and identified here as VICTIM 4.

All in violation of Title 18, United States Code, Sections 894(a)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT FOURTEEN
(Conspiracy to Commit Laundering)

Beginning on or about June 2023 and continuing through on or about July 2025, both dates being approximate and inclusive, in the Northern District of Indiana, the defendants

JAMES L. GERODEMOS a/k/a “Jimmy the Greek”
DEAN GIALAMAS a/k/a “Dean Gem”
BASAM FAWZI IBRAHIM a/k/a “Donny Brasco”

willfully and knowingly conspired and agreed together and with each other, and with others known and unknown to the Grand Jury to commit certain offenses:

- a) Under title 18, United States Code section 1956 to conduct an attempt to conduct financial transactions affecting Interstate commerce, which transactions involve proceeds of specified unlawful activity that is, Operation of and Illegal Gambling Business in violation of Title 18 United States Code section 1955: (1) With the intent to promote the carrying on of such specified unlawful activity and (2) Knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of set specified unlawful activity, and while conducting or attempting to conduct such financial transactions knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and

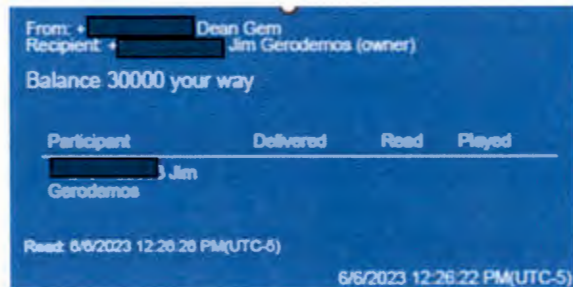
b) Under Title 18, United States Code section 1957, to conduct or attempt to conduct monetary transactions affecting Interstate commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, Operation of an Illegal Gambling Business in violation of Title 18 United States Code section 1955.

In furtherance of the above conspiracy, the defendants engaged in the following:

OVERT ACTS

June 5-6, 2023

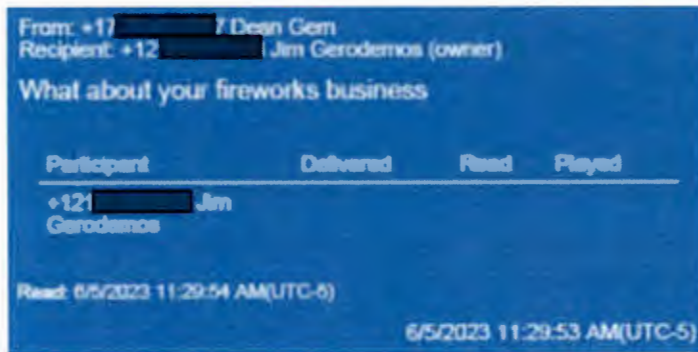
1. On June 5, 2023, DEAN GIALAMAS sent the following texts to JAMES GERODEMOS:



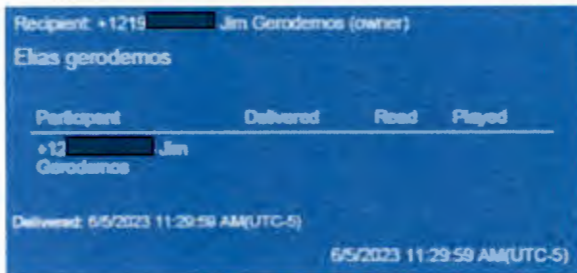
2. The following text was sent from JAMES GERODEMOS and DEAN GIALAMAS:



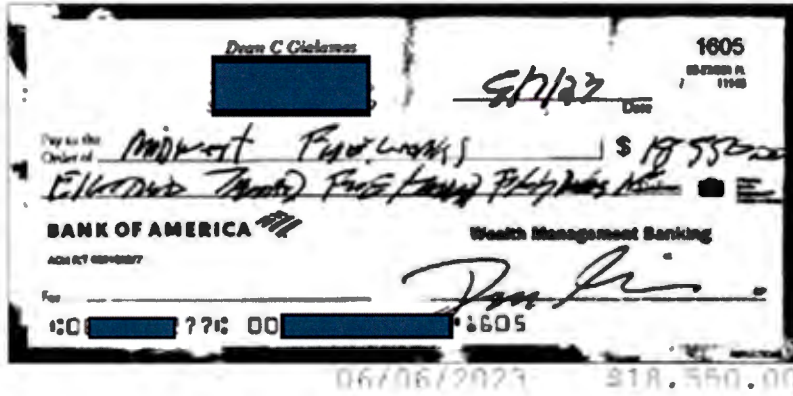
3. DEAM GIALAMAS replied with two additional texts to JAMES GERODEMOS:



4. JAMES GERODEMOS then sent texts directing that this check for the transfer of illegal gambling be made payable to either ELIAS GERODEMOS or Midwest Fireworks, a business operated by JAMES GERODEMOS:

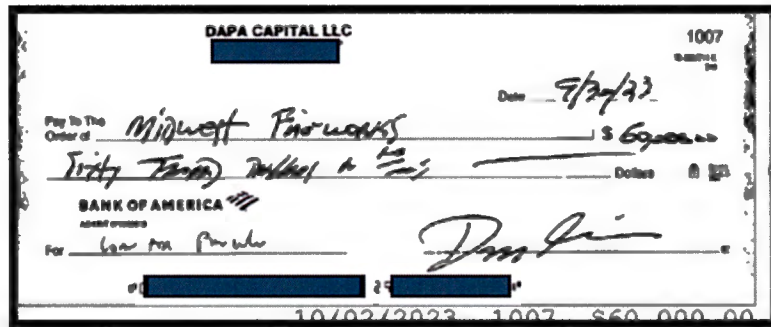


5. On June 6, 2023, a check drawn on the personal bank account of DEAN GIALAMAS in the amount of \$18,550 was deposited into a bank account controlled by JAMES GERODEMOS:



September 30 - October 2, 2023

6. On September 30, 2023, DEAN GIALAMAS wrote check No. 1007, for \$60,000, and drawn on “DAPA Capital,” a company owned and controlled by DEAN GIALAMAS, to JAMES GERODEMOS a payment of illegal gambling proceeds:



7. On October 2, 2023, JAMES GERODEMOS deposited the above check into an account controlled by JAMES GERODEMOS.

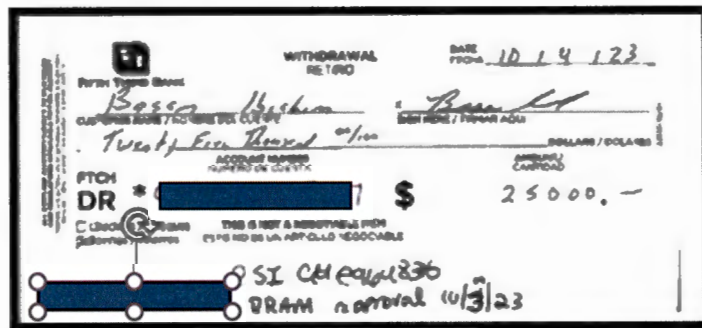
October 3-4, 2023

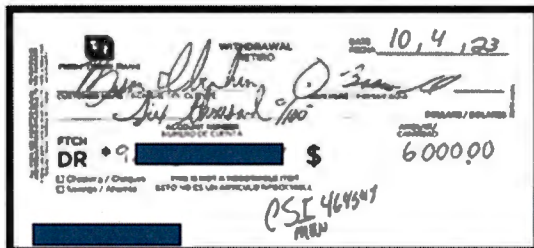
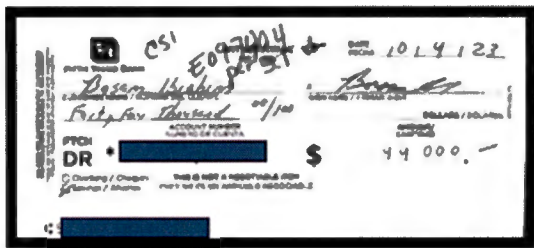
8. On October 3, 2023, as agreed to by DEAN GIALAMAS and JAMES GERODEMOS in text messages, DEAN GIALAMAS wrote another check drawn on “DAPA Capital,” check No. 1011, for JAMES GERODEMOS, but payable to BASAM

IBRAHIM and identified in the memo line as a “car payment”, but in actuality, payment of illegal gambling proceeds. BASAM IBRAHIM deposited this check into his account:



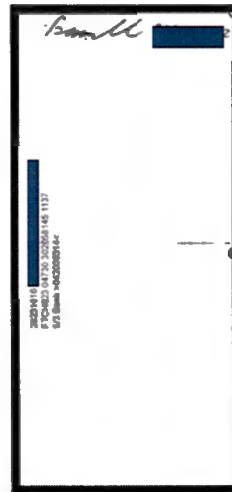
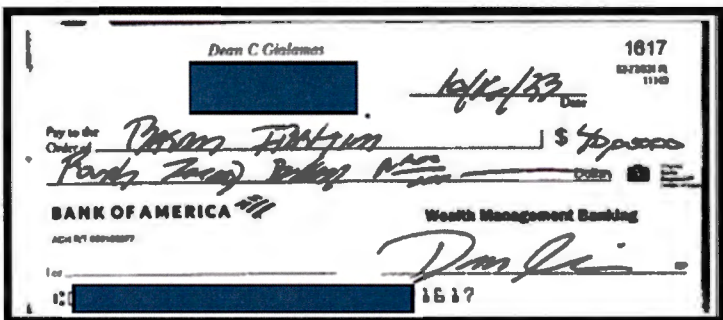
9. The next day, October 4, 2023, BASAM IBRAHIM withdrew all \$75,000 in cash, from his deposit from the previous day of \$75,000 , in three separate transactions in amounts of \$25,000, 44,000, and \$6,000:



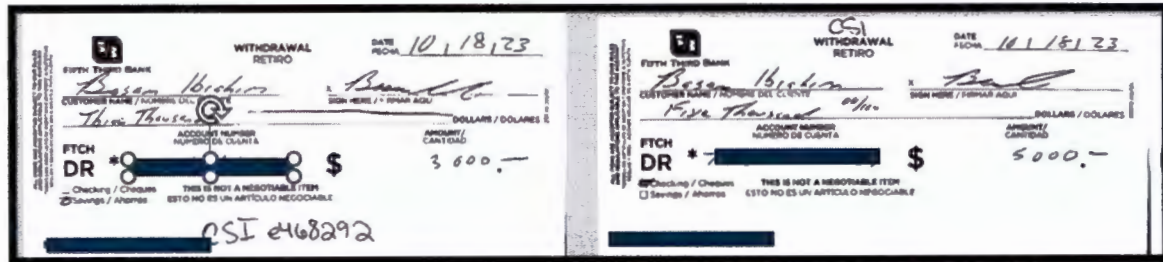
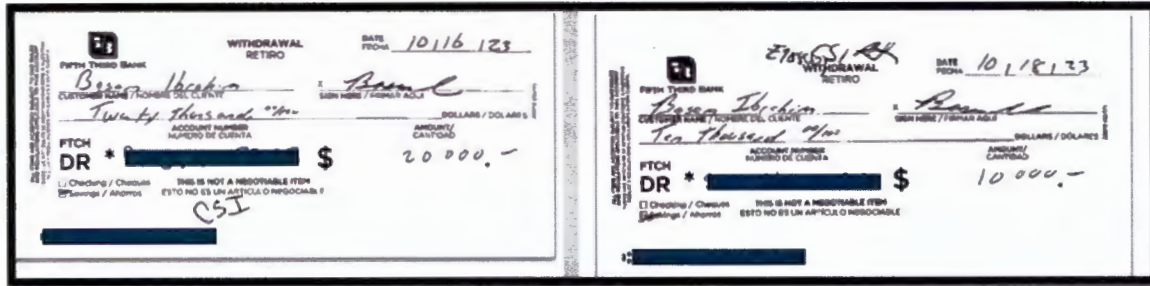


October 16-18, 2023

10. Again, on October 16, 2023, as agreed to by DEAN GIALAMAS and JAMES GERODEMOS in text messages, DEAN GIALAMAS wrote another personal check, No. 1617, for JAMES GERODEMOS, but payable again to BASAM IBRAHIM as payment of illegal gambling proceeds. BASAM IBRAHIM deposited this check into his account:



11. A short time later, on October 16, 2023, and October 18, 2023, in four separate transactions in amounts of \$20,000, \$10,000, \$3,000 and \$5,000, BASAM IBRAHIM withdrew \$38,000 in cash, of his \$40,000 deposit made earlier in the day:



April 2024- July 2025

12. On April 29, 2024, DEAN GIALAMAS sent JAMES GERODEMOS the following texts:



13. On April 29, 2024, DEAN GIALAMAS sent a Zelle transfer of \$2,000 to JAMES GERODEMOS.

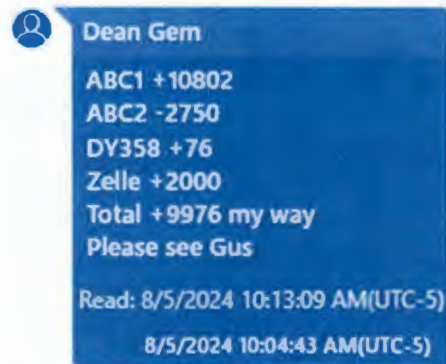
14. On April 30, 2024, DEAN GIALAMAS sent another Zelle transfer of \$2,000 to JAMES GERODEMOS.

15. On August 5, 2024, DEAN GIALAMAS sent the following text message to JAMES GERODEMOS:



16. On August 5, 2024, DEAN GIALAMAS sent a Zelle transfer for \$2,000 to JAMES GERODEMOS.

17. On October 28, 2024, DEAN GIALAMAS sent the following text message to JAMES GERODEMOS:



18. On October 30, 2024, DEAN GIALAMAS sent a Zelle transfer for \$2,000 to JAMES GERODEMOS.

19. In approximately April of 2025, DEAN GIALAMAS sent three Zelle transfers to JAMES GERODEMOS totaling \$5,000.

20. Between approximately May of 2025 and July of 2025, JAMES GERODEMOS sent DEAN GIALAMAS sent seven Zelle transfers totaling \$12,000.

All in violation of Title 18 United States Code section 1956(h), 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), 1957 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT FIFTEEN

(Conspiracy to Commit Laundering)

Beginning on or about February 2023 and continuing through on or October 2025, both dates being approximate and inclusive, in the Northern District of Indiana, the defendants

**JAMES L. GERODEMOS a/k/a “Jimmy the Greek”
ATHENA OLGA GERODEMOS**

willfully and knowingly conspired and agreed together and with each other, and with others known and unknown to the Grand Jury to commit certain offenses:

- a) Under title 18, United States Code section 1956 to conduct an attempt to conduct financial transactions affecting Interstate commerce, which transactions involve proceeds of specified unlawful activity that is, Operation of and Illegal Gambling Business in violation of Title 18 United States Code section 1955: (1) With the intent to promote the carrying on of such specified unlawful activity and (2) Knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of set specified unlawful activity, and while conducting or attempting to conduct such financial transactions knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and

- b) Under Title 18, United States Code section 1957, to conduct an attempt to conduct monetary transactions affecting Interstate commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, Operation of an Illegal Gambling Business in violation of Title 18 United States Code section 1955.

In furtherance of the above conspiracy, the defendants engaged in the following:

OVERT ACTS

1. Between approximately February 2023 until October 2025, ATHENA GERODEMOS engaged in approximately 200 financial transactions involving illegal gambling proceeds. In these transactions, known gamblers or associates of the Gerodemos Gambling Organization wrote checks or Zelled funds to a bank account owned and operated by ATHENA GERODEMOS. Once receiving these gambling proceeds, ATHENA GERODEMOS then transferred these funds to an account controlled by JAMES GERODEMOS.

2023

2. Additionally, ATHENA GERODEMOS picked up and delivered gambling proceeds/payments for the Gerodemos Gambling Organization.

3. On February 10, 2023, as payment of gambling proceeds, Bettor A Zelled to an account controlled by ATHENA GERODEMOS \$500. Later that same day,

ATHENA GERODEMOS Zelled \$500 to an account controlled her father, JAMES GERODEMOS.

4. On September 29, 2023, as payment of gambling proceeds, VICTIM 1 Zelled to an account controlled by ATHENA GERODEMOS \$1,600. Later that same day, ATHENA GERODEMOS Zelled \$1600 to an account controlled her father, JAMES GERODEMOS.

5. On October 4, 2023, as payment of gambling proceeds, VICTIM 1 Zelled to an account controlled by ATHENA GERODEMOS two payments of \$1,600 and \$800. Later that same day, ATHENA GERODEMOS Zelled \$2400 to an account controlled her father, JAMES GERODEMOS.

6. On October 16, 2023, as payment of gambling proceeds, VICTIM 1 Zelled to an account controlled by ATHENA GERODEMOS \$2,000. Later that same day, ATHENA GERODEMOS Zelled \$2000 to an account controlled her father, JAMES GERODEMOS.

7. On October 23, 2023, as payment of gambling proceeds, VICTIM 1 Zelled to an account controlled by ATHENA GERODEMOS \$1,000. Later that same day, ATHENA GERODEMOS Zelled \$1000 to an account controlled her father, JAMES GERODEMOS.

8. On November 27, 2023, JAMES GERODEMOS texted Bettor B “M25055.”

9. On December 6, 2023, Bettor B texted JAMES GERODEMOS, “Send me daughter information for Zelle” and “Send 555.” This same day, Bettor B Zelled to an account controlled by ATHENA GERODEMOS \$555. Later that same day, ATHENA GERODEMOS Zelled \$500 to an account controlled her father, JAMES GERODEMOS.

10. On January 22, 2022, JAMES GERODEMOS text Bettor C “M152957”.

11. On December 11, 2023, Bettor C Zelled to an account controlled by ATHENA GERODEMOS \$500. On December 12, 2023, ATHENA GERODEMOS Zelled \$500 to an account controlled her father, JAMES GERODEMOS.

2024

12. On January 1, 2024, JAMES GERODEMOS texted Victim 1 “M11301”.

13. On January 11, 2024, VICTIM 1 Zelled to an account controlled by ATHENA GERODEMOS \$2500. Later that same day, ATHENA GERODEMOS Zelled \$2500 to an account controlled by her father, JAMES GERODEMOS. Later that day, JAMES GERODEMOS texted Victim 1 “M8801”, the new balance owed amount reduced by the payment of \$2500:



14. On January 12, 2024, VICTIM 1 text JAMES GERODEMOS:

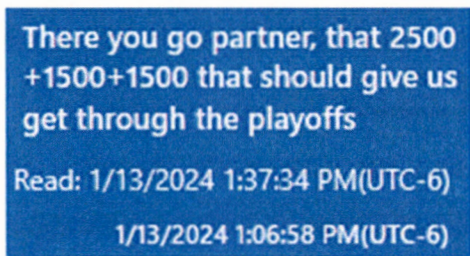
“ Jimmy, unfortunately Cell (Zelle) has a limit on how much you can send I guess per week or whatever the fuck is but they didn’t let me send more than 1500 so im sending 1500 now and I will send another 1500 or we’ll figure

out another way. Just depends on what the month is and I think its 10,000...”
and

“... Ill get one of those liners (line pools) where the fuck you got. I just been busy. Im sorry I hadn’t got your call.”

15. On January 12, 2024, as payment of gambling proceeds, VICTIM 1 Zelled to an account controlled by ATHENA GERODEMOS \$1,500. Later that same day, ATHENA GERODEMOS Zelled \$1500 to an account controlled her father, JAMES GERODEMOS.

16. The next day, January 13, 2024, JAMES GERODEMOS sent the following text to VICTIM 1:



There you go partner, that 2500
+1500+1500 that should give us
get through the playoffs
Read: 1/13/2024 1:37:34 PM(UTC-6)
1/13/2024 1:06:58 PM(UTC-6)

17. On January 17, 2024, Victim 1 Zelled \$1500, and Bettor B Zelled \$500 to an account controlled by ATHENA GERODEMOS. Later that same day, ATHENA GERODEMOS Zelled \$2000 to an account controlled her father, JAMES GERODEMOS.

18. On February 21, 2024, Bettor B again Zelled \$500 to an account controlled by ATHENA GERODEMOS. Later that same day, ATHENA GERODEMOS Zelled

\$500 to an account controlled her father, JAMES GERODEMOS. James GERODEMOS sent Bettor B a text showing the new reduced balance owed:



19. On March 29, 2024, Bettor B again Zelled \$300 to an account controlled by ATHENA GERODEMOS. Later that same day, ATHENA GERODEMOS Zelled \$300 to an account controlled her father, JAMES GERODEMOS. Bettor B then sent two texts to JAMES GERODEMOS: “Gave 300” and “To daughter.” JAMES GERODEMOS replied, “Ty” and the new reduced balance of “M23700”:

20. Later that day, JAMES GERODEMOS sent a text showing the new reduced balance owed:



21. On July 28, 2024, ATHENA GERODEMOS collected gambling proceeds from GUS KAPORIS, who was listed in JAMES GERODEMOS’ contacts as “Deans

Runner.” During the course of ATHENA GERODEMOS collecting these gambling proceeds on this day, the following texts were sent and received:

GUS KAPORIS to JAMES GERODEMOS:

There will be 7175 in envelope. Too many bills. Sticky. Sticky stick. Count by hand. Text you when I give it to Athena before 9pm

JAMES GERODEMOS to GUS KAPORIS:

Ok

ATHENA GERODEMOS to JAMES GERODEMOS:

He's meeting me at briar around 8:30

JAMES GERODEMOS to ATHENA GERODEMOS:

Ok

GUS KAPORIS to JAMES GERODEMOS:

Gobines in envelope

Athena got it

JAMES GERODEMOS to GUS KAPORIS:

Ok

DEAN GIALAMAS to JAMES GERODEMOS:

Gus paid Athena

Balance -0

JAMES GERODEMOS to GIALAMAS:

Ok

All in violation of Title 18 United States Code section 1956(h), 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), 1957 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT SIXTEEN

(Conspiracy to Commit Laundering)

Beginning on or about September 2023 and continuing through on or December 2025, both dates being approximate and inclusive, in the Northern District of Indiana, the defendants

**JAMES L. GERODEMOS a/k/a “Jimmy the Greek”
ELIAS CHRIS GERODEMOS**

willfully and knowingly conspired and agreed together and with each other, and with others known and unknown to the Grand Jury to commit certain offenses:

- a) Under title 18, United States Code section 1956 to conduct an attempt to conduct financial transactions affecting Interstate commerce, which transactions involve proceeds of specified unlawful activity that is, Operation of and Illegal Gambling Business in violation of Title 18 United States Code section 1955: (1) With the intent to promote the carrying on of such specified unlawful activity and (2) Knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of set specified unlawful activity, and while conducting or attempting to conduct such financial transactions knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and

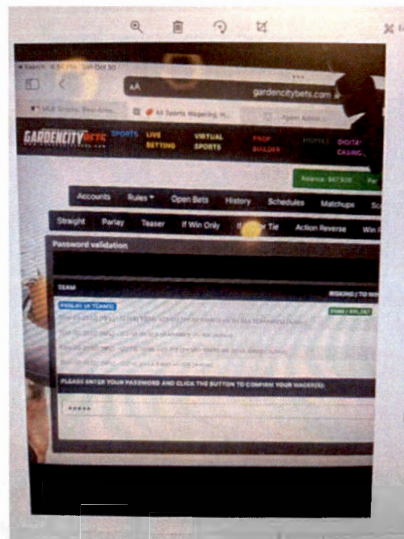
b) Under Title 18, United States Code section 1957, to conduct an attempt to conduct monetary transactions affecting Interstate commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, Operation of an Illegal Gambling Business in violation of Title 18 United States Code section 1955.

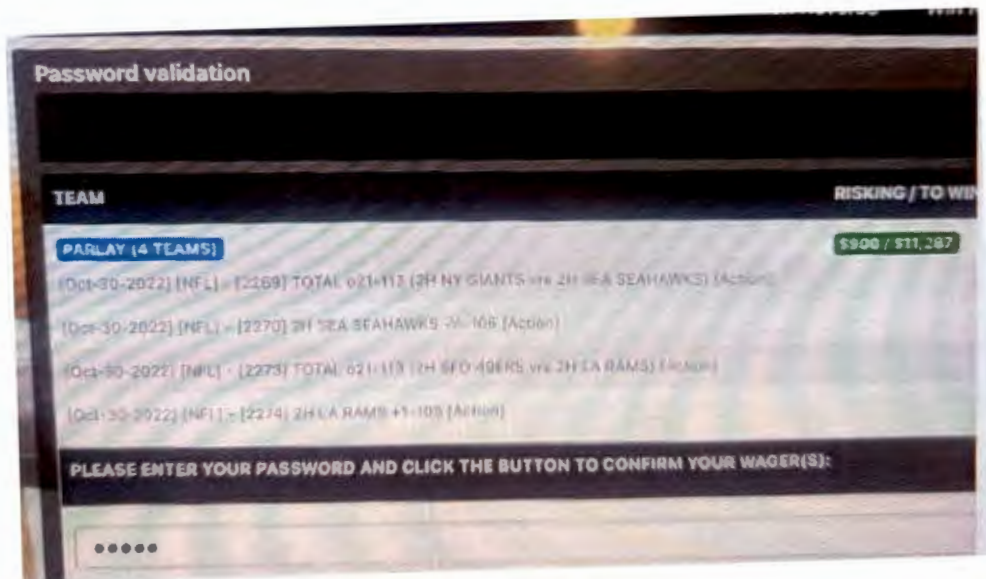
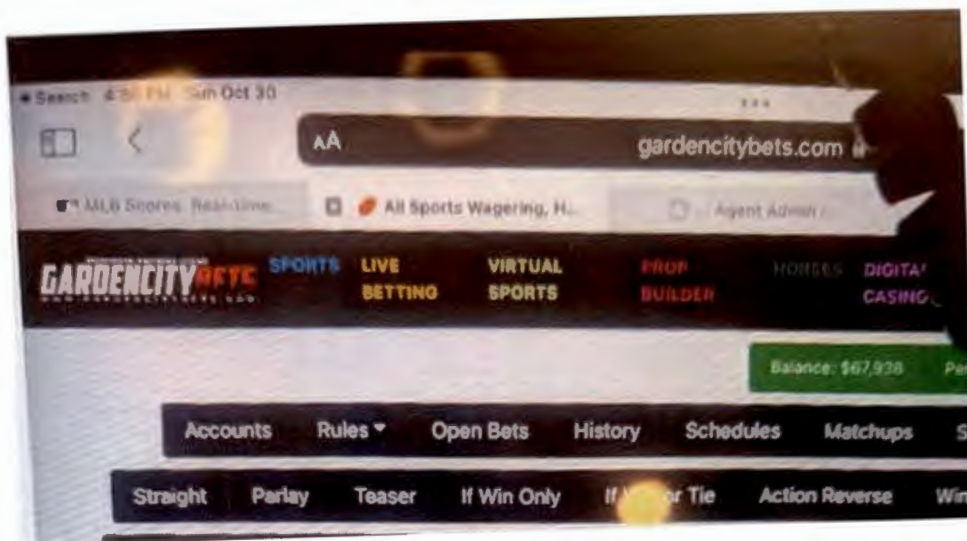
In furtherance of the above conspiracy, the defendants engaged in the following:

OVERT ACTS

1. ELIAS GERODEMOS is the son of CHRIS GERODEMOS and nephew of JAMES GERODEMOS

2. On October 30, 2022, ELIAS GERODEMOS sent a screen capture to DEAN GIALAMAS, of the Gardencitybets webpage run by DEAN GIALAMAS depicting a 4-team NFL parlay bet for \$900 to win \$11,287. That screen capture also showed a balance of \$67,938 with the Gardencitybets illegal gambling website:





3. Throughout the time of this conspiracy, ELIAS GERODEMOS was employed as a licensed financial advisor at a local investment/brokerage firm. ELIAS GERODEMOS previously worked as a manager at the Paragon restaurant. ELIAS

GERODEMOS held several investment/financial licenses in Indiana and numerous other states. During this conspiracy, ELIAS GERODEMOS repeatedly updated JAMES GERODEMOS on account balances of several brokerage accounts managed by ELIAS GERODEMOS for accounts belonging to JAMES GERODEMOS, ATHENA GERODEMOS, and others, as well making deposits of gambling proceeds into those accounts.

4. JAMES GERODEMOS would message ELIAS GERODEMOS regarding checks written to a third party, but for the benefit of JAMES GERODEMOS, that were being deposited into investment accounts owned by JAMES GERODEMOS and managed by ELIAS GERODEMOS.

5. On numerous occasions, ELIAS GERODEMOS received checks from JAMES GERODEMOS for illegal gambling losses owed to JAMES GERODEMOS, written by known bettors. ELIAS GERODEMOS deposited these third-party checks into JAMES GERODEMOS and ATHENA GERODEMOS' brokerage accounts.

6. Also on numerous occasions, ELIAS GERODEMOS received checks from JAMES GERODEMOS for illegal gambling losses owed to JAMES GERODEMOS, written by known bettors who left the "Pay to the order of" line blank. JAMES GERODEMOS or ELIAS GERODEMOS would then fill in the name "JAMES/JIM GERODEMOS" on this line on the check. ELIAS GERODEMOS would then deposit these completed checks into JAMES GERODEMOS and ATHENA GERODEMOS' brokerage accounts.

7. On January 23, 2024, the following text messages were exchanged between ELIAS GERODEMOS and JAMES GERODEMOS

JAMES GERODEMOS: "Athena 116 Violet 117500."

ELIAS GERODEMOS: "Ok when I see you next I'll get the checks."

JAMES GERODEMOS: "U here."

ELIAS GERODEMOS: "Are you here."

JAMES GERODEMOS : "Yes"

Brokerage firm records indicate that three checks were deposited into the brokerage account on 01/23/24, among the checks was one from a known gambler for \$8,201.

8. On March 19, 2024, the following text message exchange occurred between ELIAS GERODEMOS and JAMES GERODEMOS:

JAMES GERODEMOS: "Did I cash that 2500 check?" and "U".

ELIAS GERODEMOS: "I'm doing them all today" and "You're nuts."

JAMES GERODEMOS: "I'll see U tonight with it."

9. On April 1, 2024, JAMES GERODEMOS inquired of ELIAS GERODEMOS if he could use crypto currency for deposits into his brokerage accounts:

ELIAS GERODEMOS: "Can't take crypto."

10. ELIAS GERODEMOS also knew BASAM IBRAHIM and SANAD IBRAHIM and was part of multiple three-way calls involving JAMES GERODEMOS, BASAM IBRAHIN, and SANAD IBRAHIM. On March 6, 2024, the following text message occurred:

ELIAS GERODEMOS TO JAMES GERODEMOS;

"Who did you say was on the line with you"

JAMES GERODEMOS: "Sanad."

ELIAS GERODEMOS: "Oh ok I thought you said bassam."

11. On June 3, 2024, the following text message occurred depicting ELIAS GERODEMOS helping JAMES GERODEMOS write out checks:

ELIAS GERODEMOS: "I'll be there in 30"

JAMES GERODEMOS: "Ok."

ELIAS GERODEMOS: "Don't write a new check yet, when I see you I can write it for you."

12. On August 16, 2024, the following text message occurred regarding checks:

JAMES GERODEMOS: "U at the shop."

ELIAS GERODEMOS: "No I have meetings outside of the office today. Whats up."

JAMES GERODEMOS: "I wanted to drop off checks"

ELIAS GERODEMOS: "Drop them off to the lady in front and when I come back I'll see them."

JAMES GERODEMOS: "U have a forklift?"

13. On January 2, 2025, JAMES GERODEMOS gave ELIAS GERODEMOS checks in JAMES GERODEMOS' name but wanted them deposited into ATHENA GERODEMOS' account. ELIAS GERODEMOS sends the following text:

ELIAS GERODEMOS: "Subtract \$10k from Athena & put into (another name). The checks were in your name so they said I have to deposit into your account, not Athena."

14. On January 10, 2025, JAMES GERODEMOS texts ELIAS GERODEMOS:

JAMES GERODEMOS: “Athena 921000 Violet 804800” and “Check about from (name of gambler).”

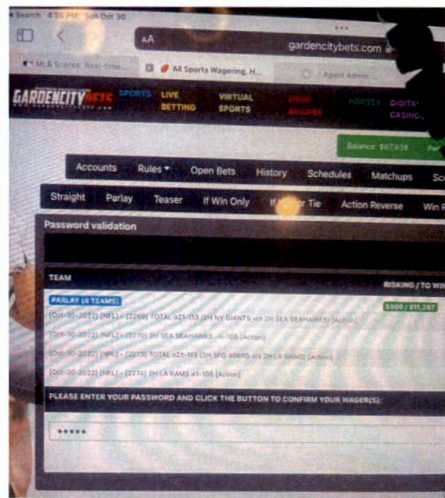
15. On February 19, 2025, ELAIS GERODEMOS texts JAMES

GERODEMOS: “You gave \$1,825,038 Profit: violet 974604 Athena: 940540 1,915,144 Profit of \$90,106 all together.”

All in violation of Title 18 United States Code section 1956(h), 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), 1957 and 2.

COUNTS SEVENTEEN THROUGH TWENTY-EIGHT
 (Transmission of Wagering Information)

On or about the dates alleged below, in the Northern District of Indiana and elsewhere, the below identified defendants, together with others, being engaged in the business of betting and wagering, did knowingly and intentionally use a wire communication facility, that is: a cellular telephone, for the transmission in interstate and foreign commerce of information assisting in the placing of wagering information and for receiving money or credit as a result of bets or wagers, in regards to sporting events and contests.

Count	Date	Defendant/Sender	Recipient	Text Message
17.	12/21/21	Giuseppe Manzi	James Gerodemos	“Spikebet.com 112310 J101”
18.	10/30/22	Elias Gerodemos	Dean Gialamas	Screen capture of gardencitybets site with betting information 

19.	8/15/23	James Strezovski	James Gerodemos	"My qr is 8540"
20.	11/23/23	Nenad Radoja	James Gerodemos	"Happy thanksgiving brother. Set me up another account whenever you get time."
21.	2/24/24	Andrew Nguyen	James Gerodemos	"Our number under 10k don't worry lol"
22.	5/29/24	Vladimir Ganz	James Gerodemos	"Something is fucked up. I need to look at it. Who bet tony or Jim."
23.	7/28/24	Gus Kaporis	James Gerodemos	"There will be 7175 in envelope. Too many bills. Sticky. Sticky stick. Count by hand. Text you when I give the it to Athena before 9:00 PM"
24.	7/28/24	Athena Gerodemos	James Gerodemos	"He's meeting me at briar around 8:30"
25.	9/16/24	Samuel Nuzzo	James Gerodemos	"That's correct you know what that means is if I lose, I pay 100% up to 1800. after that, I go to 75% you're aware of that correct?"
26.	1/20/25	Filippo Rovito	James Gerodemos	"What numbers we got?"
27.	2/4/25	Alexander Gagianas	James Gerodemos	"Waz P1600"
28.	2/11/25	Michael Campbell	James Gerodemos	"Is the offer still on the table for half if I pick up the money from our friend in Miami?"

All in violation of Title 18, United States Code, Section 1084(a) .

**FORFEITURE ALLEGATION NO. 1
(GAMBLING FORFEITURE)**

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1955 set forth in **Count One** of this indictment, defendants

**JAMES L. GERODEMOS a/k/a “Jimmy the Greek”
DEAN GIALAMAS a/k/a “Dean Gem”
CHRIS L. GERODEMOS
BASAM FAWZI IBRAHIM a/k/a “Donny Brasco”
SANAD WALID IBRAHIM a/k/a “Sanad Taka”
PETER PAVLOPOULOS a/k/a “Pete Goodys”
FILIPPO ROVITO a/k/a “Gigi”
MICHAEL D. CAMPBELL a/k/a “Michael Way Out” a/k/a “Chuckie Hoffa”
EHAB MUSTAFA a/k/a “Eddie”
STEVE ARMENTA
SAMUEL A. NUZZO
ALEXANDER G. GAGIANAS a/k/a “Alex Gyros”
GUS KAPORIS a/k/a “Deans Runner”
RAMI F. MANSOUR a/k/a “Rami Straight Flush”
NENAD RADOJA a/k/a “Butch Hunkee”
MARCUS VLADIMIR GANZ a/k/a “Vladimir Ganz”
PAUL FRANZE a/k/a “Paulie Scarf”
ATHENA OLGA GERODEMOS
ELIAS CHRIS GERODEMOS
JAMES STREZOVSKI a/k/a/ “Jim Macedonian”
ANDREW NGUYEN a/k/a “Ceasars Andrew”
GIUSEPPE MANZI a/k/a “Joe Polozzo”**

shall forfeit to the United States of America the following:

- a. any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of any offense constituting “specified unlawful activity,”
- and

b. any property, including money, used in violation of the provisions of Section 1955 of Title 18, United States Code, including, but not limited to the sum of \$5,000,000 United States currency, and:

- 1) Ginos Steak House, 600 E 81st. Ave., Merrillville, IN 46410
- 2) Indiana Alcohol Beverage and Catering license for Gino's Steak House, License #: RR4510693
- 3) Parogan Restaurant, 1701 E. 37th Ave., Hobart, IN 46342
- 4) Indiana Alcohol Beverage and Gaming license for Parogan Restaurant: Alcohol Beverage License #RR4581359
Indiana Gaming License # GR4525019
- 5) Automobile: 2024 Land Rover Range Rover SE P530, Vin # SALKP9E98RA227596
- 6) Automobile: GMC Sierra K1500 SLT, VIN # 3GTUUEDD9TG1125944
- 7) JP Morgan Chase Checking Account No. 000000804490156
- 8) JP Morgan Chase Checking Account No. 000000616822370
- 9) First Financial Bank Business Account No. 5311402654
- 10) First Financial Bank Checking Account No. 5313054222
- 11) Bank of America Checking Account No. 291029334346
- 12) Bank of America Checking Account No.237027314827
- 13) Ameriprise Financial SPS Advantage Account No. 0000864208483133
- 14) Ameriprise Financial Brokerage Account No. 0000575386941133
- 15) Ameriprise Financial Active Portfolio Account No. 0000128675402133
- 16) Ameriprise Financial SPS Advantage Account No. 0000385830070133

- 17) Ameriprise Financial SPS Advantage Account No. 0000759652092133
- 18) Ameriprise Financial Roth Account No. 0000709124309133
- 19) Ameriprise Financial Brokerage Account No. 0000184582690133
- 20) Fifth Third Bank Savings Account No. 9235113827
- 21) Bank of America Checking Account No. 3765796892
- 22) Bank of America Business Account No. 291037859318
- 23) Wells Fargo Checking Account No. 9890333561

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture, including, but not limited to:

- 1) Residence and property at 538 Turnberry Drive, Schererville, IN 46375

- 2) Residence and property at 10600 Mahogany Terrace, St. John, IN 46373
- 3) Residence and property at 10301 W 109th Ave., Cedar Lake, IN 46303
- 4) Residence and property at 10404 White Oak Lane, Apartment 2B, Munster, IN 46321
- 5) Structure and property at: CHERRIES AND BERRIES PANCAKE HOUSE, 791 Indian Boundary Rd., Chesterton, IN 46304
- 6) Residence and property at 3700 Montgomery St., Hobart, IN 46342
- 7) Residence and property at 2367 Vigo Street, Lake Station, IN 46405
- 8) Residence and property at 2603 Sweetbroom Rd., Naperville, IL 60564
- 9) Residence and property at 360 E Randolph St., Unit 2908, Chicago, IL 60601
- 10) Residence and property at 36750 US Highway 19, N 20-205, Palm harbor, FL 34684
- 11) Residence and property at 381 Herman St., Crete, IL
- 12) Ameriprise Financial Brokerage Account No. 0000552671372133
- 13) Ameriprise Financial SPS Advantage Account No. 0000554530782133

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 1955(d),
and Title 28, United States Code, Section 2461(c).

**NOTICE OF FORFEITURE NO. 2
(MONEY LAUNDERING FORFEITURE)**

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1956(h), 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 1957 as set forth in **Count Fourteen** of this indictment, defendants

**JAMES L. GERODEMOS a/k/a “Jimmy the Greek”
DEAN GIALAMAS a/k/a “Dean Gem”
BASAM FAWZI IBRAHIM a/k/a “Donny Brasco”**

shall forfeit to the United States of America:

- a. any property, real or personal, involved in such violations, and any property traceable to such property, including, but not limited to, the sum of **\$175,000** United States currency, for which defendants are jointly and severally liable.

2. As a result of the violations of Title 18, United States Code, Sections 1956(h), 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 1957 as set forth in **Count Fifteen** of this indictment, defendants

**JAMES L. GERODEMOS a/k/a “Jimmy the Greek”
ATHENA OLGA GERODEMOS**

shall forfeit to the United States of America:

- a. any property, real or personal, involved in such violations, and any property traceable to such property, including, but not limited to, the sum of **\$227,496** United States currency.

3. As a result of the violations of Title 18, United States Code, Sections 1956(h), 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 1957 as set forth in **Count Sixteen** of this indictment, defendants

JAMES L. GERODEMOS a/k/a "Jimmy the Greek"
ELIAS CHRIS GERODEMOS

shall forfeit to the United States of America:

- a. any property, real or personal, involved in such violations, and any property traceable to such property, including, but not limited to, the sum of **\$340,349** United States currency, for which defendants are jointly and severally liable.

4. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982.

**NOTICE OF FORFEITURE NO. 3
(TRANSMISSION OF WAGERING INFORMATION FORFEITURE)**

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1084 set forth in **Counts Seventeen through Twenty-Eight** of this indictment, defendants

FILIPPO ROVITO a/k/a "Gigi"
MICHAEL D. CAMPBELL a/k/a "Michael Way Out" a/ka/ "Chuckie Hoffa"
SAMUEL A. NUZZO
ALEXANDER G. GAGIANAS a/k/a "Alex Gyros"
GUS KAPORIS a/k/a "Deans Runner"
NENAD RADOJA a/k/a "Butch Hunkee"
MARCUS VLADIMIR GANZ a/k/a "Vladimir Ganz"
ATHENA OLGA GERODEMOS
ELIAS CHRIS GERODEMOS
JAMES STREZOVSKI a/k/a/ "Jim Macedonian"
ANDREW NGUYEN a/k/a "Ceasars Andrew"
GIUSEPPE MANZI a/k/a "Joe Polozzo"

shall forfeit to the United States of America:

a. any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of any offense constituting "specified unlawful activity."

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28,

A TRUE BILL:

/s/ Foreperson
Foreperson

ADAM L. MILDRED
UNITED STATES ATTORNEY

By: /s/ Philip C. Benson
Philip C. Benson
Assistant United States Attorney

/s/ Kevin F. Wolff
Kevin F. Wolff
Assistant United States Attorney