

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
v.	)	
	)	
IGOR SHER,	)	
EGUERT NAGAJ,	)	
IGOR FILATOV,	)	
DMITRI KONOVOLOV,	)	Violations: Title 18, United States
MARICELA HERNANDEZ, and	)	Code, Sections 1001, 1341,
VERA SMOLYANSKY	)	1512(c), and 1623(a)

**INDICTMENT**

**COUNTS ONE THROUGH SIXTEEN**

The SPECIAL SEPTEMBER 2012 GRAND JURY charges:

1. At times material to this indictment:

a. Defendant IGOR SHER was a licensed chiropractor in the State of Illinois and worked at North Suburban Chiropractic Clinic Ltd., which purported to provide health-care services to patients, including chiropractic and physical-therapy services. Defendant IGOR SHER was the President, Secretary, and Agent of the Clinic, which operated from a suite of offices located at 329 and 333 West Dundee Road, Buffalo Grove, Illinois.

b. Defendant EGUERT NAGAJ was a licensed physician in the State of Illinois and worked at Advanced Arlington Medical Center, Ltd., and Advanced Arlington Sports Medicine Center, Ltd., which purported to provide

health-care services including pain management and general-practice services to patients. Defendant EGUERT NAGAJ was the President, Secretary, and Agent of both the Medical Center and Sports Medicine Center, which operated from a suite of offices located at 329 and 333 West Dundee Road, Buffalo Grove, Illinois.

c. Defendants IGOR SHER and EGUERT NAGAJ were the only signatories on and controlled bank accounts in the names of North Suburban Chiropractic Clinic Ltd., Advanced Arlington Medical Center, Ltd., and Advanced Arlington Sports Medicine Center, Ltd.

d. Defendant IGOR FILATOV was the billing manager for North Suburban Chiropractic Clinic Ltd., Advanced Arlington Medical Center, Ltd., and Advanced Arlington Sports Medicine Center, Ltd.

e. Defendants MARICELA HERNANDEZ, DMITRI KONOVOLOV, and VERA SMOLYANSKY were residents of Illinois.

f. Blue Cross Blue Shield of Illinois, Aetna Insurance, United Healthcare, Allstate Fire and Casualty Insurance Company, and others, were insurance companies that provided coverage for patients that purportedly sought treatment at North Suburban Chiropractic Clinic Ltd., Advanced Arlington Medical Center, Ltd., and Advanced Arlington Sports Medicine Center, Ltd.

g. Defendants IGOR SHER and EGUERT NAGAJ, as well as North Suburban Chiropractic Clinic Ltd., Advanced Arlington Medical Center, Ltd., and Advanced Arlington Sports Medicine Center, Ltd., were required to submit certain claim information to the insurance companies for reimbursement for covered

services provided to patients. Required claim information included the claimant's name; his/her insurance number; his/her date of birth; the health-care services provided; the location where the health-care benefits were provided; the name of the doctor or chiropractor providing the health-care benefits; and the charge for each health-care benefit provided.

h. The insurance companies paid for services that were covered by a patient's insurance policy and for which a representation had been made that the services were actually provided to patients.

i. The insurance companies paid approved claims for covered services either by check sent by United States mail or by electronic direct deposit.

2. Beginning no later than 2003, and continuing through in or about January 2014, at Buffalo Grove and Deerfield, in the Northern District of Illinois, Eastern Division, and elsewhere,

IGOR SHER,  
EGUERT NAGAJ,  
IGOR FILATOV,  
DMITRI KONOVOLOV,  
MARICELA HERNANDEZ, and  
VERA SMOLYANSKY,

defendants herein, together with Co-Schemers O.A., Z.B., S.L., G.M., T.M., N.M., L.T., and others, devised, intended to devise, and participated in a scheme to defraud insurance companies providing health-care benefits, including Blue Cross Blue Shield of Illinois, Aetna Insurance, United Healthcare, and Allstate Fire and Casualty Insurance Company, and to obtain money and property by means of

materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts, which scheme is further described in the following paragraphs.

3. It was part of the scheme that defendants IGOR SHER, EGUERT NAGAJ, IGOR FILATOV, DMITRI KONOVOLOV, MARICELA HERNANDEZ, and VERA SMOLYANSKY, together with Co-Schemers O.A., Z.B., S.L., G.M., T.M., N.M., L.T., and others, fraudulently obtained at least approximately \$2,980,000 from insurance companies by submitting, and causing to be submitted, fraudulent claims for payment to the insurance companies that falsely represented that certain health-care services were provided to patients, knowing that those services were not actually provided.

4. It was further part of the scheme that defendants IGOR FILATOV, DMITRI KONOVOLOV, MARICELA HERNANDEZ, and VERA SMOLYANSKY, together with Co-Schemers O.A., Z.B., S.L., G.M., T.M., N.M., L.T., and others, were purported patients of defendants IGOR SHER and EGUERT NAGAJ, and allowed their identifying information, including their insurance information, to be used by defendants IGOR SHER and EGUERT NAGAJ and others in order to submit claims to insurance companies for health-care services that were not actually provided.

5. It was further part of the scheme that defendants IGOR SHER, EGUERT NAGAJ, IGOR FILATOV, DMITRI KONOVOLOV, MARICELA HERNANDEZ, and VERA SMOLYANSKY, together with Co-Schemers O.A., Z.B., S.L., G.M., T.M., N.M., L.T., and others, created “sign-in” sheets that falsely

represented that purported patients were physically present and received health-care services on certain dates from defendants IGOR SHER and EGUERT NAGAJ, when, in fact, defendants knew that the services had not been provided to patients on the dates indicated on the “sign-in” sheets.

6. It was further part of the scheme that defendants IGOR SHER, EGUERT NAGAJ, and IGOR FILATOV created, and caused to be created, claims forms submitted to insurance companies and medical records that falsely represented that patients received health-care benefits on certain dates when, in fact, they knew that the health-care benefits had not been provided to patients.

7. It was further part of the scheme that defendants IGOR SHER and EGUERT NAGAJ typically deposited, and caused to be deposited, the money they received from the insurance companies for services that were not actually provided into bank accounts they controlled in the names of North Suburban Chiropractic Clinic Ltd., Advanced Arlington Medical Center, Ltd., and Advanced Arlington Sports Medicine Center, Ltd.

8. It was further part of the scheme that defendants IGOR SHER and EGUERT NAGAJ compensated defendants DMITRI KONOVOLOV, MARICELA HERNANDEZ, and VERA SMOLYANSKY, as well as Co-Schemers O.A., Z.B., S.L., G.M., T.M., N.M., L.T., and others—the purported patients—for their participation in submitting claims to insurance companies for services that were not rendered to them. Defendants IGOR SHER and EGUERT NAGAJ typically paid defendants DMITRI KONOVOLOV, MARICELA HERNANDEZ, and VERA SMOLYANSKY, as

well as Co-Schemers O.A., Z.B., S.L, G.M., T.M., N.M., L.T., and others, a portion of the money paid by insurance companies for services that were not rendered, or arranged to have their yearly insurance deductibles satisfied.

9. It was further part of the scheme that defendants IGOR SHER and EGUERT NAGAJ often wrote checks written on bank accounts held in the names of North Suburban Chiropractic Clinic Ltd., Advanced Arlington Medical Center, Ltd., and Advanced Arlington Sports Medicine Center, Ltd. to pay defendants DMITRI KONOVOLOV, MARICELA HERNANDEZ, and VERA SMOLYANSKY, as well as Co-Schemers O.A., Z.B., S.L, T.M., N.M., and others, their portion of the fraud proceeds paid by insurance companies for services that were not rendered.

10. It was further part of the scheme that defendants IGOR SHER and EGUERT NAGAJ maintained, and caused to be maintained, on a computer located in their shared office, spreadsheets that tracked the false claims submitted to the insurance companies and calculated the split between defendants IGOR SHER and EGUERT NAGAJ and the purported patients, including defendants DMITRI KONOVOLOV, MARICELA HERNANDEZ, and VERA SMOLYANSKY, as well as Co-Schemers O.A., Z.B., S.L, T.M., N.M., and others.

11. It was further part of the scheme that defendants IGOR SHER and EGUERT NAGAJ instructed the purported patients, including defendants DMITRI KONOVOLOV, MARICELA HERNANDEZ, and VERA SMOLYANSKY, as well as Co-Schemers O.A., S.L., G.M., T.M., and others, to lie when asked about the services provided by defendants IGOR SHER and EGUERT NAGAJ and the

purpose of the money they received from defendants IGOR SHER and EGUERT NAGAJ.

12. It was further part of the scheme that defendants IGOR SHER, EGUERT NAGAJ, IGOR FILATOV, DMITRI KONOVOLOV, MARICELA HERNANDEZ, and VERA SMOLYANSKY did misrepresent, conceal, hide, and cause to be misrepresented, concealed, and hidden, the purposes of and acts done in furtherance of this scheme.

13. As a result of this scheme, defendants IGOR SHER and EGUERT NAGAJ fraudulently obtained and converted to their own use in excess of at least approximately \$2,980,000 in payments from the insurance companies, which they at times split with defendants IGOR FILATOV, DMITRI KONOVOLOV, MARICELA HERNANDEZ, VERA SMOLYANSKY, as well as Co-Schemers O.A., Z.B., S.L., G.M., T.M., N.M., L.T., and others.

14. On or about the dates set forth below, at Buffalo Grove, in the Northern District of Illinois, Eastern Division, and elsewhere,

IGOR SHER,  
EGUERT NAGAJ,  
IGOR FILATOV,  
DMITRI KONOVOLOV,  
MARICELA HERNANDEZ, and  
VERA SMOLYANSKY,

defendants herein, together with Co-Schemers O.A., Z.B., S.L., G.M., T.M., N.M., L.T., and others, for the purpose of executing the scheme, knowingly caused to be delivered by United States mail, according to the direction thereon, envelopes

addressed to the purported patients and North Suburban Chiropractic Clinic Ltd., Advanced Arlington Medical Center, Ltd., and Advanced Arlington Sports Medicine Center, Ltd., in Illinois, containing checks to reimburse such purported patients and the companies controlled by defendants IGOR SHER and EGUERT NAGAJ for health-care services that defendants IGOR SHER and EGUERT NAGAJ never actually provided:

<b>COUNT</b>	<b>DEFENDANTS</b>	<b>MAILING DATE</b>	<b>PAID AMT.</b>	<b>INS. COMPANY</b>	<b>“PATIENT”</b>
<b>One</b>	SHER NAGAJ FILATOV	1/25/2013	\$1007	Allstate	E.P.
<b>Two</b>	SHER NAGAJ FILATOV	2/14/2013	\$3189	Allstate	E.P.
<b>Three</b>	SHER NAGAJ FILATOV	4/29/2013	\$15,436	BCBSIL	O.A.
<b>Four</b>	SHER NAGAJ FILATOV	8/9/2010	\$10,891	BCBSIL	S.L.
<b>Five</b>	SHER NAGAJ FILATOV	9/6/2011	\$16,247	BCBSIL	T.M.
<b>Six</b>	SHER NAGAJ FILATOV	10/27/2011	\$619	Aetna	N.M.
<b>Seven</b>	SHER NAGAJ FILATOV	5/28/2013	\$18,269	BCBSIL	V.P.



<b>COUNT</b>	<b>DEFENDANTS</b>	<b>MAILING DATE</b>	<b>PAID AMT.</b>	<b>INS. COMPANY</b>	<b>“PATIENT”</b>
<b>Eight</b>	SHER NAGAJ FILATOV	10/24/2011	\$3502	BCBSIL	Z.B.
<b>Nine</b>	SHER NAGAJ FILATOV	1/11/2010	\$4216	BCBSIL	L.T.
<b>Ten</b>	SHER NAGAJ FILATOV SMOLYANSKY	8/10/2009	\$551	UNITED HEALTH- CARE	SMOLYANSKY
<b>Eleven</b>	SHER NAGAJ FILATOV	10/26/2009	\$3336	BCBSIL	FILATOV
<b>Twelve</b>	SHER NAGAJ FILATOV	11/2/2009	\$5854	BCBSIL	FILATOV
<b>Thirteen</b>	SHER NAGAJ FILATOV HERNANDEZ	2/7/2011	\$8793	BCBSIL	HERNANDEZ
<b>Fourteen</b>	SHER NAGAJ FILATOV KONOVOLOV	5/21/2012	\$21,381	BCBSIL	KONOVOLOV
<b>Fifteen</b>	SHER NAGAJ FILATOV	1/4/2013	\$2204	Allstate	G.M.
<b>Sixteen</b>	SHER NAGAJ FILATOV	1/4/2013	\$2796	Allstate	G.M.

In violation of Title 18, United States Code, Section 1341.

## COUNT SEVENTEEN

The SPECIAL SEPTEMBER 2012 GRAND JURY further charges:

1. Paragraph 1(a) of Count One is incorporated here.
2. At times material to this indictment:
  - a. The Federal Bureau of Investigation was a federal government agency that, along with a federal grand jury, was investigating defendant IGOR SHER, Eguert Nagaj, and others concerning false and fraudulent insurance claims.
  - b. The FBI was also investigating Chiropractor A concerning similar conduct. As part of that investigation, the FBI executed a search warrant at Chiropractor A's office and interviewed certain of Chiropractor A's patients.
  - c. After the FBI executed the search warrant at Chiropractor A's office, certain purported patients of Chiropractor A established a relationship with defendant IGOR SHER.
  - d. By in or about May 2013, defendant IGOR SHER was aware of the FBI's investigation concerning Chiropractor A and was concerned about the FBI's investigation of his own conduct, as well as the conduct of Eguert Nagaj and others.

3. Between no later than in or about June 2013 and continuing through at least in or about September 2013, at Buffalo Grove, in the Northern District of Illinois, Eastern Division, and elsewhere,

IGOR SHER,

defendant herein, corruptly obstructed, influenced, and impeded an official proceeding, namely, the federal criminal investigation and federal grand jury investigation concerning defendant IGOR SHER, Eguert Nagaj, and others, and attempted to do so, by instructing Individual V.P. and others to lie to federal investigators if approached and by directing the creation of false and fraudulent documents;

In violation of Title 18, United States Code, Section 1512(c).

## COUNT EIGHTEEN

The SPECIAL SEPTEMBER 2012 GRAND JURY further charges:

1. Paragraphs 1(a) through (d) of Count One of this indictment are incorporated here.

2. At times material to this indictment:

a. The Federal Bureau of Investigation and the SPECIAL SEPTEMBER 2012 GRAND JURY were investigating possible violations of federal criminal law in connection with Igor Sher, Eguert Nagaj, and others' fraudulent billing of insurance companies for services that were never performed.

b. The following matters, among others, were material to that investigation:

- whether purported patients of Igor Sher and Eguert Nagaj, including defendant IGOR FILATOV, actually received medical treatment; and
- the purpose of money transfers among Igor Sher, Eguert Nagaj, their purported patients, defendant IGOR FILATOV, and others.

3. On or about July 10, 2013, at Wheeling, in the Northern District of Illinois, Eastern Division,

IGOR FILATOV,

defendant herein, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency within the executive branch of the Government of the United States, when in substance he stated that:

- a. he never saw or knew or heard of Igor Sher or Eguert Nagaj writing checks to patients;
- b. he never instructed patients to talk to Igor Sher or Eguert Nagaj about collecting payments;
- c. he did not know if Advanced Arlington Medical Center or North Suburban Chiropractic Center billed for services that were not rendered; and
- d. Advanced Arlington Medical Center or North Suburban Chiropractic Center did not make payments to patients;

In violation of Title 18, United States Code, Section 1001(a)(2).

**COUNT NINETEEN**

The SPECIAL SEPTEMBER 2012 GRAND JURY further charges:

1. At times material to this indictment:

a. The SPECIAL SEPTEMBER 2012 GRAND JURY was conducting an investigation into possible violations of federal criminal law in connection with Igor Sher, Eguert Nagaj, and others' fraudulent billing of insurance companies for services that were never performed.

b. The following matters, among others, were material to the Grand Jury's investigation:

- the purpose of money transfers among Igor Sher, Eguert Nagaj, their purported patients, and others.

2. On or about November 7, 2013, at Chicago, in the Northern District of Illinois, Eastern Division,

DMITRI KONOVOLOV,

defendant herein, did knowingly make a false material declaration under oath in a proceeding before a grand jury of the United States, in that KONOVOLOV testified, in substance:

a. he received checks from Igor Sher and Eguert Nagaj for referring patients to them and being their loyal customer;

In violation of Title 18, United States Code, Section 1623(a).

**COUNT TWENTY**

The SPECIAL SEPTEMBER 2012 GRAND JURY further charges:

1. Paragraphs 1(a) and (b) of Count Nineteen of the indictment are incorporated here.

2. On or about November 21, 2013, at Chicago, in the Northern District of Illinois, Eastern Division,

MARICELA HERNANDEZ,

defendant herein, did knowingly make a false material declaration under oath in a proceeding before a grand jury of the United States, in that HERNANDEZ testified, in substance:

a. she received checks from Igor Sher for referring patients and stuffing envelopes; and

b. the checks she received from Igor Sher did not represent her split of payments from Blue Cross Blue Shield;

In violation of Title 18, United States Code, Section 1623(a).

**COUNT TWENTY-ONE**

The SPECIAL SEPTEMBER 2012 GRAND JURY further charges:

1. Paragraphs 1(a) and (b) of Count Nineteen of the indictment are incorporated here.

2. On or about January 30, 2014, at Chicago, in the Northern District of Illinois, Eastern Division,

VERA SMOLYANSKY,

defendant herein, did knowingly make a false material declaration under oath in a proceeding before a grand jury of the United States, in that SMOLYANSKY testified, in substance:

a. she received checks from the office of Igor Sher and Eguert Nagaj for referring patients; and

b. the checks she received did not represent overbilling of her insurance by Igor Sher and Eguert Nagaj for services they did not provide;

In violation of Title 18, United States Code, Section 1623(a).



## FORFEITURE ALLEGATION

The SPECIAL SEPTEMBER 2012 GRAND JURY further charges:

1. The allegations of Counts One through Sixteen of this indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C).

2. As a result of the violations of Title 18, United States Code, Section 1341, as alleged in Counts One through Sixteen the indictment,

IGOR SHER,  
EGUERT NAGAJ, and  
IGOR FILATOV,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any right, title, and interest he may have in any property, real or personal, which constitutes and is derived from proceeds obtained, directly or indirectly, as a result of the charged offenses, which total at least approximately \$2,980,000.

3. The interests of defendants IGOR SHER, EGUERT NAGAJ, and IGOR FILATOV subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(1)(C) and Title 28, United States Code, Section 2461(c), include, but are not limited to, funds in the amount of \$2,980,000, and the following automobiles and real property:

- a. a 2011 Audi A4, VIN: WAUFFAFL2BN053222;
- b. a 2013 Lexus RX350, VIN: 2T2BK1BA7DC168403;
- c. a 2013 Audi Q5, VIN: WA1LF AFP5DA032264;

- d. a 2014 Acura RDX, VIN: 5J8TB4H3XEL000480;
- e. a residence located at 1303 Ashley Court, Vernon Hills, Illinois,

real estate index number 15-15-308-019-0000, whose legal description is:

LOT 301 IN THE SARAH'S GLEN SUBDIVISION IN SOUTHWEST QUARTER OF SECTION 15, TOWNSHIP 43 NORTH, RANGE 11, EAST OF THE THIRD PRINCIPAL MERIDIAN IN LAKE COUNTY, ILLINOIS;

- f. a residence located at 1050 North Claremont Drive, Palatine,

Illinois, real estate index number 02-12-401-038-1049, whose legal description is:

Parcel 1: UNIT 10-6-714 IN CLAREMONT RIDGE CONDOMINIUM AS DELINEATED ON A SURVEY OF THE FOLLOWING DESCRIBED PROPERTY:

CERTAIN LOTS IN CLAREMONT RIDGE, BEING A SUBDIVISION OF PART OF THE EAST HALF OF SECTION 12, TOWNSHIP 42 NORTH, RANGE 10, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS, WHICH SURVEY IS ATTACHED AS EXHIBIT "C" TO THE DECLARATION OF CONDOMINIUM RECORDED AS DOCUMENT NUMBER 0413331077 TOGETHER WITH ITS UNDIVIDED PERCENTAGE INTEREST IN THE COMMON ELEMENTS;

Parcel 2: EASEMENT FOR INGRESS AND EGRESS FOR THE BENEFIT OF PARCEL 1 OVER LOTS 18 AND 20 AS SHOWN ON THE PLAT OF SUBDIVISION OF CLAREMONT RIDGE RECORDED AS DOCUMENT NUMBER 0320927102 AND THE CERTIFICATE OF CORRECTION RECORDED AS DOCUMENT NUMBER 032943123;

- g. a residence located at 1100 Randville Drive, Unit 210, Palatine,

Illinois, real estate index number 02-12-100-030-1026, whose legal description is:

UNIT 210 IN RANDVILLE CONDOMINIUM TOGETHER WITH ITS UNDIVIDED PERCENTAGE INTEREST IN THE COMMON ELEMENTS, AS DEFINED IN THE DECLARATION OF CONDOMINIUM RECORDED AS DOCUMENT NUMBER

LR2799479, AS AMENDED FROM TIME TO TIME, IN THE NORTHWEST QUARTER OF SECTION 12, TOWNSHIP 42 NORTH, RANGE 10, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS;

h. a residence located at 1121 East Meadow Lake Drive, Palatine,

Illinois, real estate index number 02-12-317-019-0000, whose legal description is:

LOT 130 IN MEADOW LAKE SUBDIVISION, (A PLANNED UNIT DEVELOPMENT) IN THE EAST HALF OF THE SOUTHWEST QUARTER OF SECTION 12, TOWNSHIP 42 NORTH, RANGE 10, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS;

i. a residence located at 5183 Eastgate Lane, Long Grove, Illinois,

real estate number 15-29-101-024-0000, whose legal description is:

Lot 2 in the Eastgate Estates Subdivision, Vernon Township;

j. a commercial suite located at 321 West Dundee Road, Buffalo

Grove, Illinois, real estate index number 03-09-102-018-1003, whose legal description is:

Parcel 1: UNIT NO. 321, IN THE BUFFALO GROVE PROFESSIONAL CENTER CONDOMINIUM, AS DELINEATED ON A PLAT OF SURVEY OF THE FOLLOWING DESCRIBED TRACT OF LAND: LOT 1 IN BUFFALO GROVE PROFESSIONAL CENTRE SUBDIVISION, BEING A RESUBDIVISION OF LOTS IN DUN-LO HIGHLANDS, IN THE WEST HALF OF THE NORTHWEST QUARTER OF SECTION 9, TOWNSHIP 42 NORTH, RANGE 11, EAST OF THE THIRD PRINCIPAL MERIDIAN, WHICH PLAT OF SURVEY IS ATTACHED AS EXHIBIT "D" TO THE DECLARATION OF CONDOMINIUM OWNERSHIP RECORDED AUGUST 24, 2005, AS DOCUMENT 0523632001, AS AMENDED FROM TIME TO TIME, TOGETHER WITH ITS UNDIVIDED PERCENTAGE INTEREST IN THE COMMON ELEMENTS, ALL IN COOK COUNTY, ILLINOIS.

Parcel 2: NON-EXCLUSIVE LICENSE AGREEMENT FOR A PERIOD OF 20 YEARS, BEGINNING JANUARY 1, 2005, AND

ENDING DECEMBER 31, 2024, FOR THE PURPOSES OF PERMITTING STORM WATER DRAINAGE, AS CREATED BY LICENSE AGREEMENT FOR GOLFVIEW TERRACE DETENTION BASIN RECORDED AUGUST 17, 2005, AS DOCUMENT 0522955034, OVER THE FOLLOWING DESCRIBED PROPERTY: COMMENCING AT THE NORTHWEST CORNER OF SECTION 9, TOWNSHIP 42 NORTH, RANGE 11 EAST OF THE THIRD PRINCIPAL MERIDIAN; THENCE EAST ALONG THE NORTH LINE THEREOF, AN ASSUMED BEARING OF NORTH 90 DEGREES 00 MINUTES 00SECONDS EAST, 100 FEET; THENCE SOUTH 00 DEGREES 00 MINUTES 00 SECONDS EAST, 50.00 FEET TO THE POINT OF BEGINNING; THENCE SOUTH 90 DEGREES 00 MINUTES 00 SECONDS WEST, 90.00 FEET; THENCE SOUTH 00 DEGREES 00 MINUTES 00 SECONDS EAST 270.00 FEET; THENCE SOUTH 13 DEGREES 18 MINUTES 48 SECONDS EAST, 140 FEET; THENCE NORTH 74 DEGREES 17 MINUTES 55 SECONDS EAST, 60.00 FEET; THENCE NORTH 00 DEGREES 00 MINUTES 00 SECONDS WEST, 390.00 FEET TO THE POINT OF BEGINNING, IN COOK COUNTY, ILLINOIS, FOR THE BENEFIT OF THE FOLLOWING DESCRIBED PROPERTY: PART OF LOT 1, LOT 2 (EXCEPT THE EAST 100 FEET THEREOF) ALL IN DUN-LO HIGHLANDS, BEING A SUBDIVISION OF THE WEST HALF OF THE NORTHWEST QUARTER (EXCEPT THE SOUTH 25 ACRES THEREOF) IN SECTION 9, TOWNSHIP 42 NORTH, RANGE 11 EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE PLAT THEREOF RECORDED OCTOBER 15, 1946 AS DOCUMENT 13916670, IN COOK COUNTY, ILLINOIS;

k. a commercial suite located at 325 West Dundee Road, Buffalo Grove, Illinois, real estate index number 03-09-102-018-1004, whose legal description is:

Parcel 1: UNIT NO. 325, IN THE BUFFALO GROVE PROFESSIONAL CENTER CONDOMINIUM, AS DELINEATED ON A PLAT OF SURVEY OF THE FOLLOWING DESCRIBED TRACT OF LAND: LOT 1 IN BUFFALO GROVE PROFESSIONAL CENTRE SUBDIVISION, BEING A RESUBDIVISION OF LOTS IN DUN-LO HIGHLANDS, IN THE WEST HALF OF THE NORTHWEST QUARTER OF SECTION 9, TOWNSHIP 42 NORTH, RANGE 11, EAST OF THE THIRD PRINCIPAL MERIDIAN, WHICH PLAT OF SURVEY IS ATTACHED AS EXHIBIT "D" TO THE DECLARATION

OF CONDOMINIUM OWNERSHIP RECORDED AUGUST 24, 2005, AS DOCUMENT 0523632001, AS AMENDED FROM TIME TO TIME, TOGETHER WITH ITS UNDIVIDED PERCENTAGE INTEREST IN THE COMMON ELEMENTS, ALL IN COOK COUNTY, ILLINOIS;

Parcel 2: NON-EXCLUSIVE LICENSE AGREEMENT FOR A PERIOD OF 20 YEARS, BEGINNING JANUARY 1, 2005, AND ENDING DECEMBER 31, 2024, FOR THE PURPOSES OF PERMITTING STORM WATER DRAINAGE, AS CREATED BY LICENSE AGREEMENT FOR GOLFVIEW TERRACE DETENTION BASIN RECORDED AUGUST 17, 2005, AS DOCUMENT 0522955034, OVER THE FOLLOWING DESCRIBED PROPERTY: COMMENCING AT THE NORTHWEST CORNER OF SECTION 9, TOWNSHIP 42 NORTH, RANGE 11 EAST OF THE THIRD PRINCIPAL MERIDIAN; THENCE EAST ALONG THE NORTH LINE THEREOF, AN ASSUMED BEARING OF NORTH 90 DEGREES 00 MINUTES 00SECONDS EAST, 100 FEET; THENCE SOUTH 00 DEGREES 00 MINUTES 00 SECONDS EAST, 50.00 FEET TO THE POINT OF BEGINNING; THENCE SOUTH 90 DEGREES 00 MINUTES 00 SECONDS WEST, 90.00 FEET; THENCE SOUTH 00 DEGREES 00 MINUTES 00 SECONDS EAST 270.00 FEET; THENCE SOUTH 13 DEGREES 18 MINUTES 48 SECONDS EAST, 140 FEET; THENCE NORTH 74 DEGREES 17 MINUTES 55 SECONDS EAST, 60.00 FEET; THENCE NORTH 00 DEGREES 00 MINUTES 00 SECONDS WEST, 390.00 FEET TO THE POINT OF BEGINNING, IN COOK COUNTY, ILLINOIS, FOR THE BENEFIT OF THE FOLLOWING DESCRIBED PROPERTY: PART OF LOT 1, LOT 2 (EXCEPT THE EAST 100 FEET THEREOF) ALL IN DUN-LO HIGHLANDS, BEING A SUBDIVISION OF THE WEST HALF OF THE NORTHWEST QUARTER (EXCEPT THE SOUTH 25 ACRES THEREOF) IN SECTION 9, TOWNSHIP 42 NORTH, RANGE 11 EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE PLAT THEREOF RECORDED OCTOBER 15, 1946 AS DOCUMENT 13916670, IN COOK COUNTY, ILLINOIS.

4. If any of the forfeitable property described above, as a result of any act or omission by the defendants IGOR SHER, EGUERT NAGAJ, and IGOR FILATOV:

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,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 982(a)(2)(A) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

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FOREPERSON

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ZACHARY T. FARDON  
United States Attorney