

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT  
WILL COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS, )  
Plaintiff, )  
 )  
vs. )  
 )  
MICHAEL O BEALS, )  
IAAD H HAMAD, )  
MARKELL SPENCER, )  
HANI HOUSEIN HAMAD, )  
FEKEISHA L HAMLIN, )  
 )  
 )  
Defendants. )

Case No. 2022 CF 1604  
2022 CF 1605  
2022 CF 1608  
2022 CF 1609  
2022 CF 1610

**BILL OF INDICTMENT**

Indictment returned by Grand Jury empaneled by the Circuit Court of the Twelfth Judicial Circuit, County of Will, State of Illinois, on September 13, 2022.

The GRAND JURORS, chosen, selected and sworn, in and for the County of Will in the State of Illinois, in the name and by the authority of the People of the State of Illinois upon their oaths present that:

**COUNT I**

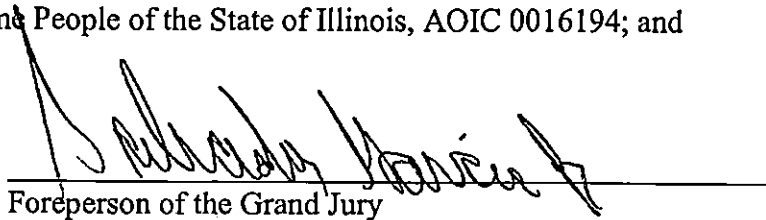
on or about January 10, 2022 through and including June 26, 2022, at and within Will County, Illinois, IAAD H. HAMAD, a male person, committed the offense of:

**ORGANIZER OF A CONTINUING FINANCIAL CRIMES ENTERPRISE  
(Class X Felony – Category A)**

in that said defendant, with the intent to commit the offense of Continuing Financial Crimes Enterprise in agreement with Ahmed Salem, Brett Pendleton and Donald Kimball, within an eighteen month period, committed three separate felony offenses of Theft, in violation of 720 ILCS 5/16-1(a)(4), exerting control over stolen property knowing the property to have been stolen or under such circumstances as would reasonably induce him to believe that the property was stolen, in that on January 10, 2022, the defendant, doing business as Liquimart,

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LLC, shipped stolen over-the-counter products to Ahmed Salem, doing business as SMTT, LLC in Hawthorne, CA, who in turn paid for said product with a wire transfer in the amount of \$49,500.00 to the Bank of America account number 291013206493 of Liquimart, Inc. on January 27, 2022; on July 23, 2022, the defendant, doing business as Liquimart, LLC, shipped stolen over-the-counter products to Brett Pendleton, doing business as Product Seller Central in Santa Ana, CA, who in turn paid for said product with a wire transfer in the amount of \$38,068.50 to the Bank of America account number 291013206493 of Liquimart, Inc. on July 26, 2022; and on July 12, 2022, the defendant, doing business as Liquimart, LLC, shipped stolen over-the-counter products to Donald Kimball, doing business as Supreme Buybacks, LLC in Irvine, CA, who in turn paid for said product with a wire transfer in the amount of \$85,000.00 to the Bank of America account number 291013206493 of Liquimart, Inc. on July 26, 2022, and each transaction was for the purpose of reselling or otherwise re-entering the stolen merchandise in commerce, and in each instance, the shipments of stolen over-the-counter products were shipped through Will County via Old Dominion Freight, in violation of Chapter 720, Section 5/17-10.6(i)(1)(A)(ii) of the Illinois Compiled Statutes, 2021, contrary to the Statute, and against the peace and dignity of the same People of the State of Illinois, AOIC 0016194; and

  
Foreperson of the Grand Jury

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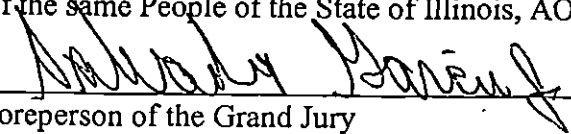
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**COUNT II**

on or about **January 1, 2021** through and including **December 31, 2021**, at and within Will County, Illinois, **IAAD H. HAMAD**, a male person, committed the offense of:

**THEFT**  
**(Class X Felony – Category A)**

in that said defendant knowingly obtained or exerted unauthorized control over property of the Illinois Department of Revenue, to wit: United States Currency, which was government property, with the intent to deprive the Illinois Department of Revenue permanently of the use or benefit of said property, and the value of the United States Currency exceeded \$100,000, in that from 01/01/2021 to 12/31/2021, the defendant received income in excess of \$5,000,000.00 from the sale of stolen over-the-counter products which were shipped through Will County, and said income was deposited into the Bank of America account number 291013206493 of Liquimart, Inc., of which the defendant is the sole signatory, and the defendant failed to report said income to the Illinois Department of Revenue on his 2021 IL 1040 State of Illinois individual income tax return, which he, or one for whose conduct he is legally accountable, caused to be submitted to the Illinois Department of Revenue on or between 04/01/2022 and 04/30/2022, and the defendant failed to pay the applicable income tax to the Illinois Department of Revenue, which exceeded \$100,000.00, and such acts were done in furtherance of a single intention and design by a series of acts and that the property was obtained from the same victim, in violation of Chapter 720, Section 5/16-1(a)(1)(A) and (b)(6.1) of the Illinois Compiled Statutes, 2021, contrary to the Statute, and against the peace and dignity of the same People of the State of Illinois, AOIC 0012598; and

  
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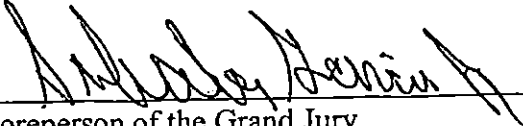
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COUNT III

on or about January 1, 2021 through and including December 31, 2021, at and within Will County, Illinois, HANI HOUSEIN HAMAD, a male person, committed the offense of:

**THEFT**  
(Class X Felony – Category A)

in that said defendant knowingly obtained or exerted unauthorized control over property of the Illinois Department of Revenue, to wit: United States Currency, which was government property, with the intent to deprive the Illinois Department of Revenue permanently of the use or benefit of said property, and the value of the United States Currency exceeded \$100,000, in that from 01/01/2021 to 12/31/2021, the defendant received income in excess of \$1,000,000.00, which was deposited into the Bank of America account number 291034177394 of King Kong Wholesale, Inc., of which the defendant is the sole signatory, and the defendant failed to report said income to the Illinois Department of Revenue on his 2021 IL 1040 State of Illinois individual income tax return, which he, or one for whose conduct he is legally accountable, caused to be submitted to the Illinois Department of Revenue on or between 04/01/2022 and 04/30/2022, and the defendant failed to pay the applicable income tax to the Illinois Department of Revenue, which exceeded \$100,000.00, and such acts were done in furtherance of a single intention and design by a series of acts and that the property was obtained from the same victim, in violation of Chapter 720, Section 5/16-1(a)(1)(A) and (b)(6.1) of the Illinois Compiled Statutes, 2021, contrary to the Statute, and against the peace and dignity of the same People of the State of Illinois, AOIC 0012598; and

  
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**COUNT IV**

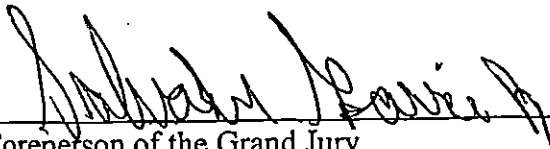
on or about **March 22, 2022** through and including **July 17, 2022**, at and within Will County, Illinois, **MARKELL SPENCER**, a male person, committed the offense of:

**CONTINUING FINANCIAL CRIMES ENTERPRISE  
(Class 1 Felony – Category A)**

in that said defendant, within an eighteen month period, committed three separate felony offenses of Theft, in violation of 720 ILCS 5/16-1(a)(4), exerting control over stolen property knowing the property to have been stolen or under such circumstances as would reasonably induce him to believe that the property was stolen, in that on March 22, 2022, the defendant tendered \$121.00 U.S.C. to an undercover officer (UCA 400) in exchange for property purported to be stolen over-the-counter products with a retail value exceeding \$500.00, while at 3638 W. 16<sup>th</sup> Street, Chicago, Cook County, IL 60423; on March 29, 2022, the defendant directed an unidentified male Hispanic to tender \$173.00 U.S.C. to an undercover officer (UCA 400) in exchange for property purported to be stolen over-the-counter products with a retail value exceeding \$500.00, while at 3638 W. 16<sup>th</sup> Street, Chicago, Cook County, IL 60423; and on July 17, 2022, the defendant directed an unknown female black to tender \$74.00 U.S.C. to an undercover officer (UCA 400) in exchange for property purported to be stolen over-the-counter products with a retail value exceeding \$500.00, while at 3638 W. 16<sup>th</sup> Street, Chicago, Cook County, IL 60423, and said over-the-counter products purchased by the defendant was shipped through Will County, IL to buyers, and in each instance, the defendant purchased property purported to be stolen over-the-counter products for the purpose of reselling or otherwise re-entering the merchandise in commerce, in violation of

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Chapter 720, Section 5/17-10.6(h) of the Illinois Compiled Statutes, 2022, contrary to the Statute,  
and against the peace and dignity of the same People of the State of Illinois, AOIC 0016193; and

  
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**COUNT V**

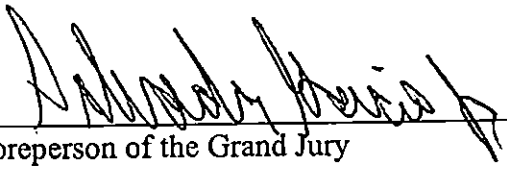
on or about **March 31, 2022** through and including **April 13, 2022**, at and within Will County, Illinois, **MICHAEL O BEALS**, a male person, committed the offense of:

**CONTINUING FINANCIAL CRIMES ENTERPRISE  
(Class 1 Felony – Category A)**

in that said defendant, within an eighteen month period, committed three separate felony offenses of Theft, in violation of 720 ILCS 5/16-1(a)(4), exerting control over property reported to be stolen, having acquired said property under such circumstances as would reasonably induce him to believe that the property was stolen, in that on March 31, 2022, the defendant tendered \$98.00 U.S.C. to an undercover officer (UCA 400) in exchange for property reported to be stolen over-the-counter products with a retail value exceeding \$500.00, while at 3814 W. Chicago Avenue, Chicago, Cook County, IL 60651; on April 6, 2022, the defendant tendered \$116.00 U.S.C. to an undercover officer (UCA 400) in exchange for property reported to be stolen over-the-counter products with a retail value exceeding \$500.00, while at 3814 W. Chicago Avenue, Chicago, Cook County, IL 60651; and on April 13, 2022, the defendant tendered \$104.00 U.S.C. to an undercover officer (UCA 400) in exchange for property reported to be stolen over-the-counter products with a retail value exceeding \$500.00, while at 3814 W. Chicago Avenue, Chicago, Cook County, IL 60651, and said over-the-counter products purchased by the defendant on April 13, 2022 was tracked to Roadrunner Freight located at 850 Windham Parkway, Romeoville, Will County, IL 60446, and was subsequently shipped to the State of New York, and tracked to Arthur Blair in New York, and in each instance, the defendant purchased stolen over-the-counter products for the purpose of reselling or otherwise re-entering the merchandise in commerce, in violation of Chapter 720, Section 5/17-10.6(h) of the Illinois Compiled Statutes, 2022, contrary to the

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Statute, and against the peace and dignity of the same People of the State of Illinois, AOIC  
0016193; and

  
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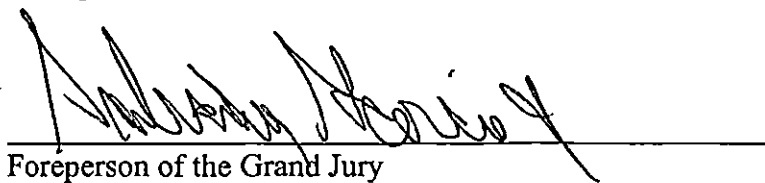


COUNT VI

on or about January 1, 2021 through and including March 1, 2022, at and within Will County, Illinois, IAAD H. HAMAD, a male person, committed the offense of:

**MONEY LAUNDERING**  
(Class 1 Felony - Category A)

in that said defendant, or one for whose conduct he is legally accountable, knowing that the property in a series of financial transactions with a value exceeding \$500,000 represented the proceeds from a felony theft, which were criminally derived property, conducted financial transactions, to wit: transfers and debits at Bank of America, when he should have known that the financial transactions were designed at least in part to conceal or disguise the nature, location, source, ownership or control of the criminally derived property, in that from 01/01/2021 to 02/28/2022, he received incoming wire transfers and deposits in the amount of \$6,034,899.27, which represented proceeds from the sale of stolen over-the-counter products which were shipped through Will County, and said moneys were deposited into the Bank of America account number 291013206493 of Liquimart, Inc., and the defendant is the sole signatory of said account, in violation of Chapter 720, Section 5/29B-1(a)(1)(B)(i) and (c)(5) of the Illinois Compiled Statutes, 2021, contrary to the Statute, and against the peace and dignity of the same People of the State of Illinois, AOIC 0013848; and

  
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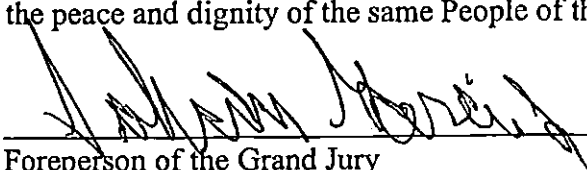
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COUNT VII

on or about January 1, 2021 through and including March 1, 2022, at and within Will County, Illinois, HANI HOUSEIN HAMAD, a male person, committed the offense of:

**MONEY LAUNDERING**  
**(Class 1 Felony - Category A)**

in that said defendant, or one for whose conduct he is legally accountable, knowing that the property in a series of financial transactions with a value exceeding \$500,000 represented the proceeds from a felony theft, which were criminally derived property, conducted financial transactions, to wit: transfers and debits at Bank of America, when he should have known that the financial transactions were designed at least in part to conceal or disguise the nature, location, source, ownership or control of the criminally derived property, in that from 01/01/2021 to 03/01/2022, he received incoming wire transfers in the amount of \$1,290,775.00, which represented proceeds from the sale of stolen over-the-counter products, which was deposited into the Bank of America account number 291034177394 of King Kong Wholesale, Inc., and the defendant is the sole signatory of said account, in violation of Chapter 720, Section 5/29B-1(a)(1)(B)(i) and (c)(5) of the Illinois Compiled Statutes, 2021, contrary to the Statute, and against the peace and dignity of the same People of the State of Illinois, AOIC 0013848; and

  
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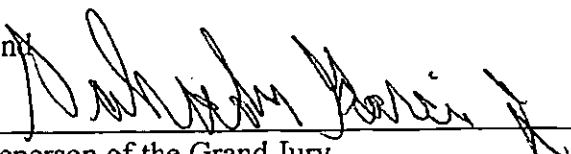
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**COUNT VIII**

on or about **January 1, 2021** through and including **December 31, 2021**, at and within Will County, Illinois, **FEKEISHA L HAMLIN**, a female person, committed the offense of:

**THEFT**  
**(Class 2 Felony – Category A)**

in that said defendant knowingly obtained or exerted unauthorized control over property of the Illinois Department of Revenue, to wit: United States Currency, which was government property, with the intent to deprive the Illinois Department of Revenue permanently of the use or benefit of said property, and the value of the United States Currency exceeded \$500.00 but did not exceed \$10,000, in that from 01/01/2021 to 12/31/2021, the defendant received income in excess of \$60,000.00, which was deposited into the J.P. Morgan Chase Bank account number 588882982 of the defendant, of which the defendant is the sole signatory, and the defendant failed to report said income to the Illinois Department of Revenue on her 2021 IL 1040 State of Illinois individual income tax return, which she, or one for whose conduct she is legally accountable, caused to be submitted to the Illinois Department of Revenue on or between 04/01/2022 and 04/30/2022, and the defendant failed to pay the applicable income tax to the Illinois Department of Revenue, which exceeded \$500.00 but did not exceed \$10,000, and such acts were done in furtherance of a single intention and design by a series of acts and that the property was obtained from the same victim, in violation of Chapter 720, Section 5/16-1(a)(1)(A) and (b)(4.1) of the Illinois Compiled Statutes, 2021, contrary to the Statute, and against the peace and dignity of the same People of the State of Illinois, AOC 0015475; and

  
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**COUNT IX**

on or about **December 16, 2020** through and including **December 15, 2021**, at and within Will County, Illinois, **FEKEISHA L HAMLIN**, a female person, committed the offense of:

**MONEY LAUNDERING  
(Class 2 Felony - Category A)**

in that said defendant, or one for whose conduct she is legally accountable, knowing that the property in a series of financial transactions with a value exceeding \$10,000 but not exceeding \$100,000, represented the proceeds from felony theft, which were criminally derived property, conducted financial transactions, to wit: deposits and withdrawals at J.P. Morgan Chase Bank, which the defendant should have known were designed at least in part to conceal or disguise the nature, location, source, ownership or control of the criminally derived property, in that from 12/16/2020 to 12/15/2021, she deposited checks in the amount of \$67,603.00, which represented proceeds from rent of real properties through SLAEB Investments, LLC., which was not reported to the Illinois Department of Revenue, which was deposited into the J.P. Morgan Chase Bank account number 588882982 of the defendant, and the defendant is the sole signatory of said account, and during the same time period, she executed debits and withdrawals exceeding \$10,000 but not exceeding \$100,000, and such acts were done in furtherance of a single intention and design by a series of acts and that the property was obtained from the same victim, in violation of Chapter 720, Section 5/29B-1(a)(1)(B)(i) and (c)(2) of the Illinois Compiled Statutes, 2021, contrary to the Statute, and against the peace and dignity of the same People of the State of Illinois, AOIC 0013846; and

  
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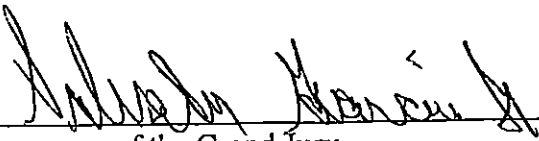
**COUNT X**

on or about **March 22, 2022** through and including **October 5, 2022**, at and within Will County, Illinois, **MARKELL SPENCER**, a male person, committed the offense of:

**MONEY LAUNDERING CONSPIRACY  
(Class 3 Felony - Category B)**

in that said defendant, or one for whose conduct he is legally accountable, with the intent that the offense of Money Laundering be committed in violation of 720 ILCS 5/29B-1(a)(1)(B)(i), agreed with another, **Iaad Hamad**, knowing that the property in a series of financial transactions with a value exceeding \$100,000 but not exceeding \$500,000, represented the proceeds from a felony theft of over-the-counter products, which were criminally derived property, **Iaad Hamad** conducted financial transactions, to wit: transfers and debits at Bank of America, which he should have known were designed at least in part to conceal or disguise the nature, location, source, ownership or control of the criminally derived property, in that he received wire transfers exceeding \$100,000 but not exceeding \$500,000 to the Bank of America account number 291013206493 of **Liquimart, Inc.**, an Illinois business entity, and said wire transfers represented proceeds from the sale of stolen over-the-counter products, which were shipped through Will County to destinations outside the State of Illinois, and **Markell Spencer** on at least one occasion between 03/22/2022 and 07/17/2022 tendered United States Currency to an undercover officer (UCA 400) in exchange for property purported to be stolen over-the-counter products with a retail value of over \$500.00, in violation of Chapter 720, Section 5/29B-1(a)(1)(B)(i) and (c)(3) and 5/8-2 of the Illinois Compiled Statutes, 2021, contrary to the Statute, and against the peace and dignity of the same People of the State of Illinois, AOIC 0013847; and

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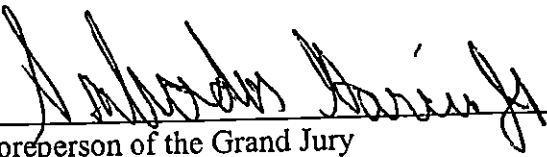
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COUNT XI

on or about April 1, 2022 through and including April 30, 2022, at and within Will County, Illinois, HANI HOUSEIN HAMAD, a male person, committed the offense of:

**WIRE FRAUD  
(Class 3 Felony – Category B)**

in that said defendant, or one for whose conduct he is legally accountable, to obtain money by means of false or fraudulent representations, and with the intent to execute the scheme or artifice or to attempt to do so, knowingly caused to be transmitted any writings, signals, pictures, sounds or electronic or electric impulses by means of wire, radio, or telecommunications to the Illinois Department of Revenue, a false representation that his federally adjusted income was \$16,900.00 for 2021, when the defendant knew that such representation was false, in violation of Chapter 720, Section 5/17-24(b)(1) and (2)(B) and (c)(2) of the Illinois Compiled Statutes, 2022, contrary to the Statute, and against the peace and dignity of the same People of the State of Illinois, AOIC 0015953; and

  
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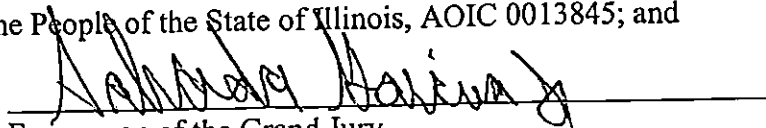
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COUNT XII

on or about April 13, 2022 through and including August 10, 2022, at and within Will County, Illinois, MICHAEL O BEALS, a male person, committed the offense of:

**MONEY LAUNDERING CONSPIRACY**  
(Class 4 Felony - Category B)

in that said defendant, or one for whose conduct he is legally accountable, with the intent that the offense of Money Laundering be committed in violation of 720 ILCS 5/29B-1(a)(1)(B)(i), agreed with another, Iaad Hamad, knowing that the property in a series of financial transactions with a value not exceeding \$10,000, represented the proceeds from the theft of over-the-counter products, which were criminally derived property, conducted financial transactions, to wit: the purchase, cleaning and shipping of purportedly stolen over-the-counter products, to conceal or disguise the nature, location, source, ownership or control of the criminally derived property, in that on April 13, 2022, the defendant purchased purportedly stolen Nexium from an undercover officer (UCA 400) for \$104.00 United States Currency, and said Nexium was equipped with a discreet tracking device, and said purported stolen over-the-counter products were transported to a building under the control of Iaad Hamad on August 9, 2022, then transported to a storage facility controlled by Iaad Hamad on August 10, 2022, and then transferred to Roadrunner Freight located at 850 Windham Parkway, Romeoville, Will County, IL 60446, where the products were shipped out of the State of Illinois, in violation of Chapter 720, Section 5/29B-1(a)(1)(B)(i) and (c)(1) and 5/8-2 of the Illinois Compiled Statutes, 2022, contrary to the Statute, and against the peace and dignity of the same People of the State of Illinois, AOIC 0013845; and

  
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COUNT XIII

on or about May 22, 2021, at and within Will County, Illinois, MICHAEL O BEALS, a male person, committed the offense of:

**FAILURE TO FILE AN INCOME TAX RETURN  
(Class 4 Felony – Category B)**

in that said defendant, a person who is subject to the provisions of the Illinois Income Tax Act, willfully failed to file a return, to wit: a 2020 Form IL-1040 Individual Income Tax Return, in violation of Chapter 35, Act 5, Section 1301 of the Illinois Compiled Statutes, 2021 contrary to the statute and against the peace and dignity of the same People of the State of Illinois, AOIC 0014303; and

  
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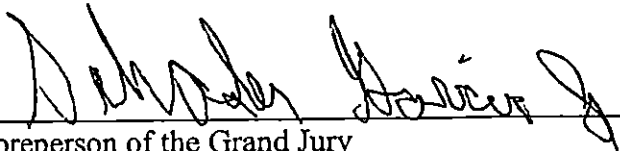
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**COUNT XIV**

on or about April 20, 2022, at and within Will County, Illinois, IAAD H. HAMAD, a male person, committed the offense of:

**FAILURE TO FILE AN INCOME TAX RETURN  
(Class 4 Felony – Category B)**

in that said defendant, a person who is subject to the provisions of the Illinois Income Tax Act, willfully failed to file a return, to wit: a 2021 Form IL-1040 Individual Income Tax Return, in violation of Chapter 35, Act 5, Section 1301 of the Illinois Compiled Statutes, 2022 contrary to the statute and against the peace and dignity of the same People of the State of Illinois, AOIC 0014303; and

  
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Foreperson of the Grand Jury

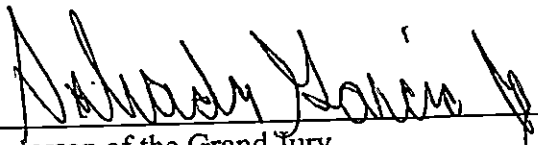
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COUNT XV

on or about April 1, 2022 through and including April 30, 2022, at and within Will County, Illinois, HANI HOUSEIN HAMAD, a male person, committed the offense of:

**FILING A FRAUDULENT INCOME TAX RETURN**  
**Class 4 Felony – Category B**

in that said defendant, a person who is subject to the provisions of the Illinois Income Tax Act, willfully filed a fraudulent income tax return, to wit: a 2021 Form IL 1040 Individual Income Tax Return, in that he failed to report income to the Illinois Department of Revenue, in violation of Chapter 35, Act 5, Section 1301 of the Illinois Compiled Statutes, 2022, contrary to the Statute, and against the peace and dignity of the same People of the State of Illinois, AOIC 0014303; and

  
Foreperson of the Grand Jury

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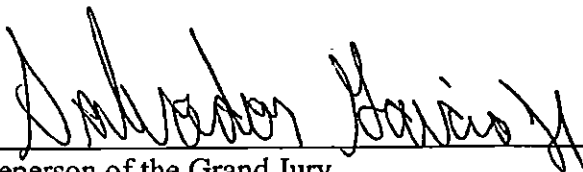
COUNT XVI

on or about April 1, 2022 through and including April 30, 2022, at and within Will County, Illinois, FEKEISHA L HAMLIN, a female person, committed the offense of:

**FILING A FRAUDULENT INCOME TAX RETURN  
Class 4 Felony – Category B**

in that said defendant, a person who is subject to the provisions of the Illinois Income Tax Act, willfully filed a fraudulent income tax return, to wit: a 2021 Form IL 1040 Individual Income Tax Return, in that she failed to report income to the Illinois Department of Revenue, in violation of Chapter 35, Act 5, Section 1301 of the Illinois Compiled Statutes, 2022, contrary to the Statute, and against the peace and dignity of the same People of the State of Illinois, AOIC 0014303.

**A TRUE BILL**

  
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Foreperson of the Grand Jury

CLERK, CIRCUIT COURT,  
-WILL COUNTY, ILLINOIS

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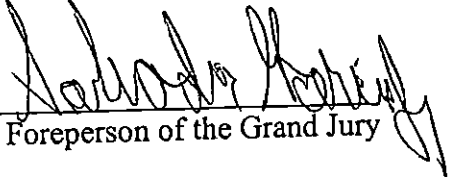
MJC/mzl

Wilmette Police Department # 21-0014576

AOIC: 0016194; 0012598; 0012598; 0016193; 0016193; 0013848; 0013848; 0015475; 0013846; 0013847; 0015953; 0013845; 0014303; 0014303; 0014303; 0014303

**LIST OF WITNESSES  
WHO TESTIFIED BEFORE GRAND JURY**

Claudia Olivio

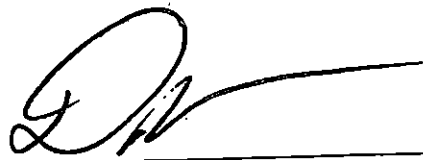
  
Foreperson of the Grand Jury

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT  
WILL COUNTY

The within indictment returned in open Court this 26th day of October, 2022.

BAIL SET AT \$500,000 – 10% TO APPLY – Michael Beals  
BAIL SET AT \$1,000,000 – 10% TO APPLY – Iaad Hamad  
BAIL SET AT \$250,000 – 10% TO APPLY – Markell Spencer  
BAIL SET AT \$1,000,000 – 10% TO APPLY – Hani Hamad  
BAIL SET AT \$250,000 – 10% TO APPLY – Fekeisha Hamlin

Warrant of Arrest ordered stayed to issue.



\_\_\_\_\_  
Judge of the Circuit Court

PREVIOUS CONDITIONS OF BOND REMAIN IN EFFECT.

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CLERK, CIRCUIT COURT  
WILL COUNTY, ILLINOIS

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