

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
<i>Plaintiff</i>	)	
	)	Case No. 19 CR 322
v.	)	
	)	Honorable Virginia M. Kendall,
CHARLES CUI	)	<i>Presiding Judge</i>
<i>Defendant</i>	)	

**DEFENDANT CUI'S SENTENCING MEMORANDUM**

The defendant, Charles Cui, by counsel, respectfully submits the following sentencing memorandum.

**I. Introduction**

A consideration of the §3553(a) factors weigh heavily against the severe guideline range and recommendation of a lengthy period of incarceration requested by the government. Charles Cui immigrated to the United States from China nearly thirty years ago with the intent to better his life. Through hard work and dedication, Charles became a devoted family man, loving husband, successful lawyer and businessman, and valued member of the community. The circumstances of this case, weighed against a lifetime as a productive citizen, contributions to his community and family, lack of criminal history, and the limited time frame of criminality warrant a below-guideline, non-custodial sentence, namely a term of probation or home confinement.

**II. The §3553(a) factors support a below guideline sentence.**

“When a defendant appears for sentencing, the sentencing court considers the defendant on that day, not on the date of his offense or the date of his conviction.” *Concepcion v. United States*, 597 U.S. 481, 486 (2022), citing *Pepper v. United States*, 562 U.S. 476, 492 (2011). While a judge must consider all the §3553(a) factors, she is “not prohibited from including in that consideration the judge’s own sense of what is a fair and just sentence under all the circumstances.” *U.S. v. Jones* 460 F.3d 191, 195 (2<sup>nd</sup> Cir. 2006).

**A. The Nature and Circumstances of the Offense**

Mr. Cui challenged the government’s case at trial. While disappointed in the result, he is respectful of the justice process and thankful for the jurors’ hard work. He was convicted of bribery and making a false statement in one of the government’s four-arc episodes presented at trial. The defense and Mr. Cui acknowledge that these are serious offenses that erode public confidence in governmental processes. However, without deprecating the seriousness of the convictions, certain aspects of the offenses warrant consideration.

**i. Bribery Convictions**

Mr. Cui’s real estate project at the Six Corners in Portage Park was designed to bring vitality to the neighborhood and having a major retailer like Binny’s undoubtedly brought value to the community. The community wanted Binny’s at that location. As Judy Frydland testified, “the concern was really with Binny’s, to get Binny’s into there. And for the economic development and getting storefronts

occupied and moving forward, it would be good to have Binny's there. It would be good for them to have the sign. Irrespective of everything else going around in, you know, the situation, it was a good thing." Tr. 3523. Binny's remains at that location to this day, and the neighborhood is revitalized. The defense does not suggest that good intentions excuse a bribe, but the circumstances here are less harmful and deserving of a lesser punishment than instances where the bribe runs contrary to the public interest.

Mr. Cui was a real estate developer, but somewhat inexperienced regarding a project of this size. He did not begin the project with any preexisting intent to bribe Edward Burke ("Burke"). See, *United States v. Nachamie*, 121 F. Supp.2d 285, 297 (S.D.N.Y. 2000) (Scheidlin, J.) (affirming that a district court may consider "a defendant's initial lack of intent" in medicare fraud scheme). When Mr. Cui sought TIF funding in 2016, he made no effort to hire Burke's firm, and the government stipulated that there was no allegation of wrongdoing in relation to the passage of the TIF deal.

No money was ever paid as the bribe was only the possibility of legal fees that never came to fruition. Klafter and Burke performed legal services for Mr. Cui but never received any fees because the firm was unsuccessful in obtaining tax relief. While the success of the bribe is not required for a conviction, it is mitigating that no money was ever tendered to Mr. Burke. In addition, the purported motivation for the bribe — to avoid a 15-year rent reduction — never materialized. Binny's never

attempted to enforce the windfall of a 15-year rent reduction, opting instead to settle the matter for \$60,000. *See*, Tr. 2101.

There was also nothing particularly complex about Mr. Cui's conduct. Mr. Cui took no surreptitious actions behind the back of government officials. There were no secret meetings or coded language, and no meetings or phone calls with Mr. Burke whatsoever. The emails make clear his intention to obtain the pole sign for his tenant. When Cui's email openly advised his lawyer of his plan to retain Mr. Burke's law firm because he needed Mr. Burke's "favor," his attorney offered no rebuke or caution. While this did not rise to the level of an advice of counsel defense, it may be considered in viewing the context of the offense.

No pressure was exerted to obtain the pole sign. The "official act" consisted of Burke's phone calls to city employees Judy Frydland and Patricia Scudiero. Both women testified that Burke exerted no pressure or made any request to reverse the denial of the pole sign. Tr. 3542, 3744, 3780.

**ii. §1001**

Like the bribery charges, making a false statement to an agent is a serious matter, however, the Court may consider facts that mitigate the offense. First, without a special verdict form, it is unclear which of the three charged statements were found to be false. Even assuming the jury found all three statements to be the basis of the conviction, these statements should be viewed in the context of the entire interview. The first false statement is that Mr. Cui made no business offers to Burke during the pole signage matter. Although Mr. Cui did not connect the firm's hire to

the pole sign, he readily disclosed his retention of Burke's firm. Tr. 145-T at 14. The other two statements – that he hired Klafter and Burke because it was a good firm and the response to the catch-all question that he provided information to the best of his knowledge – are peripheral compared to the information he did disclose. Any of the three charged false statements, when viewed in the context of the entire interview, are minimally significant. *See, United States v. Silveira*, 297 F. Supp. 2d 349, 358-60 (D. Mass. 2003), (granting a downward departure where the defendant's materially false statements were of lesser significance than his materially truthful statements and deemed "peripheral").

The statements are only a small part of the interview in which Mr. Cui made truthful disclosures about his contact with Burke, including the following: (1) he and his lawyer met with Burke regarding his TIF funding; (2) he contacted Burke about the pole sign but it did not help as the pole sign was removed; (3) he never met with Burke in person regarding the pole sign or tax work; (4) he never directly spoke with Burke; (5) he hired Klafter and Burke for property tax work; (6) he made a phone call to Burke's assistant; and (7) he spoke to Ray Chin about reaching out to Burke. GX 145-T. Cui was forthright about his interactions with Burke and did not seek to hide his connection to Burke. In fact, he was the first person to mention Burke's name during the interview. According to the agent, Mr. Cui displayed no obstructive behavior during the interview, and advised the agent he could speak with Mr. Cui's attorney. Tr. 3904, 3914, 3920, 3921-22. Mr. Cui had no prior notice of the interview and was asked to recall events that happened over a year earlier. Tr. 3869, 3884,

3888, 3899. Agents also never showed him any emails or documents to refresh his recollection.

**B. Mr. Cui's Personal History and Characteristics**

Upbringing and Education

Mr. Cui has led an exemplary life of hard work and devotion to family. He was born in 1971 in Haiyang (central China). His father worked for the local county government, primarily in the health administration office and his mother was a stay-at-home mom. His parents valued education, and they saved whatever they could to send Charles and his siblings to college. Charles obtained his bachelor's degree in communications and law in Shanghai at an international studies university in 1993. After working briefly at a national newspaper in Beijing, he came to the United States, in 1995, to study communications at Southern Illinois University. He transferred to the University of Illinois, Champaign, and received his master's degree in communications and business administration. After graduation, Mr. Cui worked for an immigration law firm in Skokie, Illinois. He then attended law school graduating from Chicago-Kent College of Law with an LLM certificate and a law degree. PSR ¶ 101. He became a naturalized U.S. citizen in 2004. PSR ¶82.

Professional success and integrity

Mr. Cui developed a successful immigration law practice handling thousands of cases over the course of his career. He represented numerous clients who sought to bring their families to the United States, including helping asylees have a chance to start new lives in America. Prashanth Mahakali remembers Charles helping him

“every step of my journey from being a professional with a work visa to a citizen and successful business owner.” Letter of Prashanth Mahakali. *See*, character letters attached as Exhibit A. George Bellas, his business attorney attests,

He is one of the most experienced and able immigration lawyers I have ever encountered in my 50+ years of practice. I have observed Charles’ treatment of his clients with the upmost regard for their best interests. He places the best interests of his clients above any other consideration and further considers their financial wherewithal. Charles has proven to be a[n] honorable person whose promise to his clients is his bond.

Letter from George Bellas; *see also*, Letter of McKenna Guertin (“his dedication to his clients is unparalleled...treating each client with genuine care and respect”). Amalfi Diaz has worked at the immigration law practice for 19 years and confirms Mr. Cui has a “strong commitment to his clients” and “approaches his work with a level of dedication and professionalism that is truly commendable.” Letter of Amalfi Diaz. Mr. Diaz has seen Mr. Cui invest “significant time and effort into ensuring that his clients’ needs are met.” *Id.*

Mr. Cui has been a dedicated and hard-working attorney for many years, helping people in difficult circumstances and prioritizing client’s needs. His commitment to helping others demonstrates that a lengthy sentence is not necessary in this case.

#### Family Ties & Support

Charles’s main focus in life is his family. He married his wife, Carley, in 2008. They have two children together: a 15 year-old daughter and a 14 year-old son. He also has an 18 year-old stepson, Mathias. (Carley’s son from a previous marriage). As detailed more fully in Carley’s letter, their son Mathias [REDACTED],

[REDACTED]

[REDACTED] and “parenting a child with these special needs, has been one of our greatest challenges.” Letter of Carley Cui. Charles is Mathias’ primary father-figure as Mathias’s biological father is not active in his life and “not capable of providing financial support or guidance.” *Id.* Charles has been “integral in helping Mathias” with his challenges. *Id.* Mathias recently finished high school and is now attending a local community college, with Charles and Carley covering his tuition and living expenses. Mathias credits Charles' guidance and support for giving him hope for a bright future, emphasizing Charles' role as a hardworking and disciplined role model who teaches the difference between right and wrong.

Mr. Cui’s other two children are in high school where they are straight A students. Charles and Carley support their son’s aspirations to become a professional golfer, investing significant time and resources to help their child’s dream come true. They are equally supportive of their daughter and her academic and extracurricular pursuits. Mr. Cui is a present, dedicated, and devoted, father, fostering a special relationship with each of his children.

The character letters depict the sincere acts of a man who is utterly committed to his family. Letter of Ethan Meister (Charles is “a dedicated father and family man”). His in-laws “have marveled at his dedication to God, his wife (our daughter), and his children. Charles is a man that, when he comes home from work, hangs up his ‘work’ hat and puts on his ‘honey’ and ‘daddy’ hat. He is always first to offer a hand for any task that needs doing.” Letter of Nancy and Patrick Sullivan.

Mr. Cui's wife, Carley, describes Mr. Cui as a "super-loving, dedicated father" and a "great human being" who is "always trying to do the best at anything he does." See PSR ¶80. Aline Grange, Carley's grandmother, has also witnessed Charles's kindness and generosity firsthand. Despite her advanced age and the loss of her husband, Aline has received consistent support from Charles, who ensures that her needs are met and surprises her with birthday dinners. Aline describes Charles as one of the nicest people that she has ever met, highlighting his dedication to his family and his role as a hardworking and loving husband and father. Letter from Aline Grange.

Charles also enjoys close relationships with his extended family. His niece, in China, attests to his selflessness and dedication. Arriving in the United States in 2012 as a college student, she faced numerous challenges but found unwavering support from Charles. He provided her with guidance, emotional support, and even legal assistance, helping her secure permanent residency. His actions profoundly impacted her life. Letter of Di Chen. Despite the physical distance between them, he maintains regular communication with his siblings in China, and they remain supportive of him during his current legal challenges.

Mr. Cui has lived his life trying to be a good husband, father, and member of the community. As the letters attest, he relies on his family and his faith, and tries to help others whenever possible. Letter of Carley Cui. Dr. Eman Alsahlani writes, Charles "is always willing to listen, offer advice, and provide support when needed. His warmth, empathy, and kindness have created a sense of belonging and unity

among our neighbors, and he is highly regarded by those who know him.” Letter of Dr. Eman Alsahlani; *see also*, Letter from McKenna Guertin (“his mentorship has been instrumental in my professional development, and I am eternally grateful for his belief in my potential when others did not”). Now, his family and community stand ready to support him.

**C. The Need to Provide Adequate Specific and General Deterrence, Reflect the Seriousness of the Offense, Promote Respect for the Law, and Provide Just Punishment**

Based on his lifetime of otherwise lawful behavior, re-offending is not a serious risk here. Nevertheless, any concerns related to specific deterrence can be achieved by a below guideline, non-custodial sentence. First, Mr. Cui is 53 years old. Recidivism rates decline relatively consistently as age increases. *See*, U.S. Sent’g Comm’n, *The Effects of Aging on Recidivism Among Federal Offenders*, p. 3, 22-23 (Dec. 2017). Recidivism rates are strongly correlated to age and the guidelines’ ranges do not account for this fact, despite the importance of age in calculating recidivism. *United States v. Carter*, 538 F.3d 784, 791-92 (7<sup>th</sup> Cir. 2008).

Mr. Cui also has no criminal history and qualifies as a zero-point offender. Studies by the United States Sentencing Commission demonstrate that individuals in lower criminal history categories are less likely to recidivate. *See*, U.S. Sent’g Comm’n, *The Past Predicts the Future: Criminal History and Recidivism of Federal Offenders*, pp. 7-8, (March 2017) (finding that the higher the criminal history category of an individual, the higher the recidivism rate).

General deterrence can also be satisfied by a non-custodial sentence. A federal felony conviction, and all the collateral consequences that accompany that label, provides a strong deterrent to the general public. Here, upon being indicted, Mr. Cui lost the TIF funding for the Six Corners project. As a result, the property went into foreclosure, and he is being sued for his personal guarantee on the loan. His law license is suspended, and he will eventually be disbarred. Even a probationary or home confinement sentence will send a strong message to the public who sees Mr. Cui lose his development, his investment, his law license, and become a convicted felon. Courts “should consider general deterrence but must also hand down an individualized sentence.” *United States v. Molton*, 743 F.3d 479, 486 (7<sup>th</sup> Cir. 2014), quoting *Gall v. United States*, 552 U.S. 38, 50 (2007).

#### **D. Unwarranted Sentencing Disparities**

Courts may consider an unwarranted sentencing disparity between co-defendants under §3553(a). *United States v. Moore*, 50 F.4<sup>th</sup> 597, 604 (7<sup>th</sup> Cir. 2022). Here, Co-defendant Burke had a guideline range of 78 to 97 months. Tr. 134. The Court determined Mr. Burke merited a sentence of two years’ imprisonment, a \$2 million fine, \$65,000 in restitution, and \$13,000 special assessment. Dk. #512. Even though Mr. Cui was convicted of a §1001 offense in addition to the bribery counts, he is significantly less culpable than Burke. Mr. Cui was not a public official, was not charged with racketeering, has a lower benefit amount under §2C1.1, lower guideline range, and no restitution. He was only involved in one of the four criminal episodes presented by the government at trial. While both Burke and Mr. Cui were convicted of bribery related to the pole sign, Burke also was convicted of racketeering (Post

Office, Field Museum, Burger King, and pole sign), extortion (Field Museum), and bribery (Post Office). While every defendant is viewed individually, and Burke's age and good deeds played a role in his sentence, he was convicted of more offenses, and more serious offenses, than Mr. Cui.

**E. The Need to Take Into Account the Types of Sentences Available**

There is no mandatory minimum sentence, and Mr. Cui is statutorily eligible for probation or an alternative sentence with a period of home confinement. Such a sentence satisfies the dictates of §3553(a). In addition to providing a strong deterrent effect, a felony conviction alone is a significant punishment, reflects the seriousness of the offense, and promotes respect for the law. *See, United States v. Engler*, 806 F.2d 425, 440 (3<sup>rd</sup> Cir. 1986) (“[I]t has been traditionally recognized that collateral consequences of felony convictions are both inevitable and serious”); *Parker v. Ellis*, 362 U.S. 574, 593-94 (1960) (Warren, C.J. dissenting) (“[C]onviction of a felony imposes a status upon a person which ... seriously affects his reputation and economic opportunities”); *United States v. Warner*, 792 F.3d 847, 860 (7<sup>th</sup> Cir. 2015) *citing Gall*, 552 U.S. at 48. Mr. Cui is now a convicted felon, a permanent consequence that will undoubtedly affect his life and employment.

Probation is “a substantial restriction of freedom” rather than “an act of leniency.” *Gall*, 552 U.S. at 43 (affirming below guideline sentence of probation). Probationers “do not enjoy the absolute liberty to which every citizen is entitled.” *United States v. Knights*, 534 U.S. 112, 119 (2001). As a sentencing option, it is imposed when it is sufficient but not greater than necessary to satisfy the goals of

§3553(a). See, *United States v. Thurston*, 544 F.3d 22 (1<sup>st</sup> Cir. 2008) (defendant convicted of conspiracy to defraud Medicare of over five million dollars received sentence of three months incarceration and 24 months' probation despite guideline range of 63 to 78 months); *United States v. Whitehead*, 532 F.3d 991 (9<sup>th</sup> Cir. 2008) (defendant convicted of copyright fraud involving over one million dollars properly sentenced to probation, community service, and substantial restitution despite guideline range of 41 to 51 months); *United States v. Boumenot*, No. 09-CR-194, 2010 WL 145848 (E.D.Wis. 2010) (Adelman, J.) (sentence of probation where mortgage fraud involved over \$200,000 in actual losses). The U.S. Sentencing Commission reported, for the Fourth Quarter of 2023, that 23% of defendants convicted of bribery/corruption received sentences of probation or an alternative to probation<sup>1</sup>. Here, a term of probation or home confinement subject to any conditions the Court deems appropriate would provide just punishment and satisfy the goals of §3553.

In addition, a false-statement offense does not equate to a prison sentence. For example, in *United States v. Desmond*, 2008 WL 686779 (N.D. Ill. 2008) the defendant was sentenced to probation despite an advisory Guidelines range of 63 to 78 months based on a loss amount of \$14.7 million for perjury and wire fraud where the offense level determined substantially overstated the seriousness of the offense. *Id. see, also United States v. Davis*, 16-CR-524-1, Dkt.18 (N.D. Ill.) (imposing a sentence of one year probation for a false statement to FBI regarding "Public Official A"). Accordingly, even in light of the §1001 conviction, a sentence less severe than that

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<sup>1</sup>[USSC Quarter Report 4th FY23.pdf](#)

which Mr. Burke received would not deprecate the seriousness of the offense and would avoid an unwarranted sentencing disparity.

The collateral consequences of the felony conviction for Mr. Cui – including imminent disbarment – also increase the overall severity of the punishment. *United States v. Stewart*, 590 F.3d 93, 141 (2d Cir. 2009) (“It is difficult to see how a court can properly calibrate a ‘just punishment’ if it does not consider the collateral effects of a particular sentence.”); *see also, United States v. Ballentine*, 2019 WL 1112273, at \*3 (N.D. Ill. Mar. 11, 2019) (noting that the district court considered, among other factors, “the likely collateral consequence of disbarment,” in imposing a sentence of one day imprisonment, three years' supervised release, a special assessment of \$600, and \$140,940 in restitution, which was far less than the nearly \$3 million requested by the government, after a jury convicted the defendant of mail fraud, wire fraud, financial institution fraud, and making false statements to a financial institution); *see also United States v. Nesbeth*, No. 15-CR-18 (E.D.N.Y. May 25, 2016) (sentencing a drug defendant to probation despite a guideline range of 33-41 months in part based on the “nearly 50,000 federal and state statutes regulations that impose penalties, disabilities, or disadvantages on a convicted felon”).

There is also no doubt that the charges themselves have imposed significant punishment. As argued *supra*, the City cancelled the TIF funding after the indictment, and the lender foreclosed on the property. Mr. Cui has lost his entire investment in the Six Corners project and the lender is suing him for \$13 million, including the balance of the loan and an enormous amount of penalties and interest.

His law license is suspended, and disbarment will follow. His conduct cost him his profession, reputation, and a felony conviction. *United States v. Dominguez*, 296 F.3d 192, 199-200 (3<sup>rd</sup> Cir. 2002) (finding significant punishment was not necessary for a defendant who lost her employment, reputation, and shamed her family for no gain).

### **III. Conclusion**

Mr. Cui recognizes his actions are what brought him here today and nothing herein is intended to diminish the seriousness of the offenses. However, several compelling factors support a below-guideline, non-custodial sentence. Mr. Cui was charged and convicted in only one of the government's four-episode arc. His offenses occurred over a short period, late in his life, resulting in an extremely low risk of recidivism. There is no restitution, but Mr. Cui will nevertheless suffer significant financial penalties based on the pending lawsuit. He also lost his real estate project, his investment, his law license, and his law practice. His lifetime of hard work to make something of himself and make his family proud is now tarnished with a felony conviction. He has an extremely loving, and supportive family and community who have attested to his lifetime of service and support. Mr. Cui understands the seriousness of his conduct. However, the charged offenses stand in stark contrast to his otherwise exemplary life and character. Considering the unique history of Mr. Cui, including his life circumstances, lack of criminal history, significant employment background, and supportive family, he respectfully requests the Court to consider a below-guideline, non-custodial sentence. Such a sentence is sufficient but not greater than necessary to satisfy the requirements of §3553(a).

Respectfully submitted,

/s/ Susan M. Pavlow  
Attorney for defendant

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March 02, 2024

Honorable Virginia M. Kendall  
United States District Court  
Northern District of Illinois

Dear Judge Kendall,

I had always hoped that my future spouse would instill wonderful values in our children, nurture their gifts and passions, and demonstrate great love, compassion and generosity to others; In fact, this is exactly what Charles Cui, my husband, has done and continues to do. Charles has not only been a dream come true, but the answer to one of my greatest prayers during one of my most difficult times of my life, after a difficult marriage, painful divorce and left raising my son with special needs on my own. Married for almost 16 years, he has been the most dedicated, loyal and amazing husband and father that me and our children could ever hope and dream of.

As our 3 kids were babies (Mathias, his stepson, 1 1/2 years old), in Charles' free time, you would find him feeding, singing to, caring for and as night came, rocking them to sleep. As they grew, he supported every effort that would enrich their lives, such as exposing them to a variety of sports and music lessons, camping trips, outings to explore museums and occasional trips to learn about and gain appreciation for history, different cultures and lands. As the kids grew, he continued to make his family his priority, by spending quality time together, cooking together, one of their favorites being traditional homemade Chinese dumplings, and making holidays special and memorable. It was a tradition for Charles and the kids to take turns reading to each other in their beds until they fell asleep each night.

Moreover, Charles has lead our family according to biblical principals by teaching, instructing, and inspiring our kids, now ages 13, 15, and a 17, to obey the words of the Bible and to worship and serve God. He has taught his children, that above all, they are to love one another, to have compassion for others, and to help when others are in need. Our family has witnessed Charles' generous spirit, as they have seen all the ways he has donated his time and money, such as helping to serve as a leader in his kids' activities and donating generously to our church and to other organizations such as Salvation Army, Goodwill, American Cancer Society and Bernie's Book Bank, which provides books to impoverished children.

As our kids are almost in their middle to late teen years now, it has given Charles immense joy to see, guide and support the people they are becoming. Our youngest son, William, is a wonderful competitive junior golfer, a straight A student, in advanced Math, and is working very hard everyday towards his dream of playing collegiate and professional golf. Our middle child, Victoria, is also a straight A student, loves Math, is taking Precalculus as a 9th grader, is involved in several charitable clubs at her high school helping others and developing her leadership skills, and dreams of majoring in business and attending University of Florida.

Charles' loving spirit and service to others, can also clearly be seen in his dedication to the raising of his stepson, Mathias. Mathias, diagnosed with [REDACTED] has really struggled over the course of the years in school and daily life. Mathias' biological father has played a very minor role in his life, and is not capable of providing financial support or guidance. Parenting a child with these special needs has been one of our greatest challenges, however, Charles has taken Mathias under his wing, and has been integral in helping Mathias turn his life around. Charles has not only planned for and committed to help Mathias attend college, but has also done everything he possibly can to mentor Mathias on life skills and possible career paths.

Mathias is very bright, personable and a very hard worker. Thanks to Charles, he is getting ready to start business school, and is excited and hopeful about his future.


It has been one of Charles' greatest joys in life to watch our children grow into the wonderful people who they are today, and to see all the fruits of such dedicated parenting. It has been the best compliment as other parents have told Charles what a "fine young man" William is as their son has finished playing a round of golf with our son, or for Victoria's friend to say that she is her parents' "favorite friend because she is such a good role model".

Charles continues to be a wonderful and integral advisor and mentor to all three kids, scheduling lessons, practice rounds, and tournaments to help William continue to improve in his golf skill and ranking, encouraging Victoria with ways to continue to develop her leadership skills and advising on various business pathways, and helping Mathias to successfully attend college and launch into his future. As any parent knows, it is no small feat to raise such wonderful, successful humans, but takes an immense level of dedicated and wise parenting. There is no greater gift for Charles than to know that his children are on their way to having a positive impact on their community and the world.

It is clear that Charles is an honorable man, with a beautiful mind and heart, and I know that he can be trusted to comply with any sentence the Court imposes.

My most sincere gratitude for your time and consideration of the above.

Sincerely,

  
Carley Cui

February 26, 2024

Honorable Virginia M. Kendall  
United States District Court  
Northern District of Illinois

Dear Judge Kendall,

Our dear Charles is our son-in-law. He is and has been a part of our family for 17 years.

I have marveled at his dedication to God, his wife (our daughter), and his children. Charles is a man that, when he comes home from work, hangs up his "work" hat and puts on his "honey" and "daddy" hat. He is always first to offer a hand for any task that needs doing. Charles took time from his business and personal time to help expedite the sale and closing of my 34 year old corporation. This is just one of many of his caring actions and reactions.

Charles is a very generous man with his love, dedication, time and money. He has supported many charitable organizations from the church, schools and community. He lends a hand where needed.

We have trusted Charles in every situation including blessing him with our daughter's hand in marriage. We know him to be an honorable man and can be trusted to fulfill any sentence that the court may impose.

Thank you for your consideration of the above.

Sincerely,

*Nancy Sullivan*  
*Patrick Sullivan*

Nancy and Patrick Sullivan



Mathias Anderson

Dear Judge Kendall,

My name is Mathias Anderson and I am 18 years old. Charles Cui is my stepfather. I call him dad. Charles has raised me since I was 18 months old. Since I have [REDACTED] school has been really challenging for me, but Charles and my mom have tried their best to give me the best treatment they can, and I am forever grateful. I just finished my high school and am attending a local community college. Charles and my mom rent an apartment for me and pay my tuition. Charles wants to give me the greatest chance to overcome the difficulties I have had with learning and to be successful, and it is because of him, that I have hope for a bright future. He is such a great role model, very hard working and disciplined, especially since I have seen my biological father struggle with being able to properly guide me in life and support me physically, emotionally and financially. Charles always teaches me and my siblings the difference between right from wrong, and is so important for me at this stage in my life when I am trying to build my skills so that I can have a great start in life. Please show him mercy and grace. Please keep our family together.

Thank you, Judge Kendall.

Sincerely,

A handwritten signature in black ink, appearing to be 'M. Anderson', written over a faint horizontal line.

Mathias Anderson

Dated: July 1, 2024

Honorable Virginia M. Kendall  
United States District Court  
Northern District of Illinois

Dear Judge Kendall,

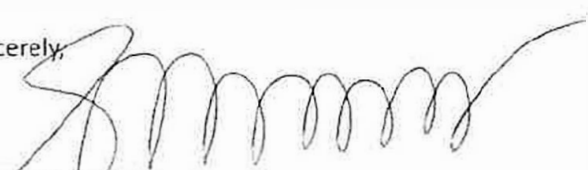
My name is Dr. Eman Alsahlani and I am writing this letter in support of Mr. Charles Cui. I wholeheartedly describe Charles as an exceptional individual who has made a profound impact on our community. I have had the pleasure of living a few houses from Charles and his beautiful family for many years, and our families have grown up together. Charles has consistently demonstrated kindness, generosity, and a willingness to help others in need.

One of the things that impresses me most about Charles is his commitment to community and family values. He has raised his children to be kind, responsible, and helpful, and they have been a joy to have around. Our children have grown up together, and Charles has always been willing to lend a hand with carpooling, driving to activities, and other tasks that have made our lives easier. Both him and his wife Carly have always been kind enough to even share hand me downs as their children are older than mine. I'll never forget the one day I found it on my doorstep with a beautiful note. Every season to follow we would find it again and again. Their kindness and generosity has always been so genuine.

Charles is more than just a good neighbor - he is a true friend and a pillar of our community. He is always willing to listen, offer advice, and provide support when needed. His warmth, empathy, and kindness have created a sense of belonging and unity among our neighbors, and he is highly regarded by those who know him.

If you have any further questions, please do not hesitate to contact me. My cell phone number is [REDACTED]  
[REDACTED] Thank you for this opportunity.

Sincerely,

  
Dr. Eman I. Alsahlani

**S&B** STOTIS & BAIRD  
CHARTERED

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Michael S. Baird | Daniel S. Hill | Eric J. Parker | Kostas L. Cios | Brian D. Nussbaum | Katherine L. Birchok

Of Counsel: Bill George Stotis | Anna C. Stotis | Louis G. Atsaves

February 27, 2024

Honorable Virginia M. Kendall  
United States District Court  
Northern District of Illinois

Dear Judge Kendall,

Please be informed that I have known Mr. Cui for over 10 years. My relationship to him is as a friend and fellow attorney.

On a personal level, I know Mr. Cui to be a great father of 3 teenage children, and devoted husband to his wife, as well as an active member of his community. Despite having a busy legal practice and actively involved in real estate development, Mr. Cui makes the time to attend his children's activities, being present in their lives. As an adult immigrant to the United States, Mr. Cui has overcome both cultural and language barriers on his road to the American Dream. He came to this country in 1995 and was able to complete a LLM at Chicago Kent Law School, despite the language barrier. That professional accomplishment is both noteworthy and impressive.

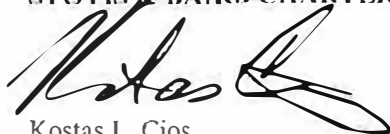
Mr. Cui has worked very hard to build a legal practice focusing on immigration matters. I am a practicing transactional attorney in the State of Illinois and have been licensed for close to 25 years. Over the past 10 years I have referred many clients to Mr. Cui, clients that needed assistance navigating the complex legal network associated with attaining United States citizenship. I can say that each and every client that I have referred to Mr. Cui have been very satisfied with Mr. Cui's work and very thankful that he treated each and everyone one of them as an individual, with individual needs and circumstances. He took the time to get to know each client and treated them as if they were his most important clients. I am truly thankful that I can refer anyone with immigration needs to Mr. Cui for help.

Overall, for the reasons stated above and many more, I have known Mr. Cui to be honorable in his personal and professional life. I know that he is someone that can be relied upon to comply with the Court's determination as to an appropriate sentence. I also know that he is and will continue to be a valuable asset to both his personal and professional community.

Thank you for your consideration of my sentiments and thoughts above.

Sincerely,

**STOTIS & BAIRD CHARTERED**



Kostas L. Cios

[kcios@stotis-baird.com](mailto:kcios@stotis-baird.com)

Aline Grange  
[REDACTED]

Dear Honorable Judge Kendall,

My name is Aline Grange and I am the grandmother of Carley Cui, who married Charles Cui in 2008. My birthday is [REDACTED] and I am now 91 years old. My husband passed away after 72 years of being together, after a long battle with dementia. I'm living alone and do everything for myself as best I can. I've known Charles for how kind and generous he has always been to me over the years. He has financially supported me by getting me groceries and making sure that I always have everything that I need. And he surprises me with birthday dinners, which means a lot! I put him on a shelf as one of the nicest people I have ever met, how he takes care of his family, how he's such a hard worker, how he loves his children and encourages them in everything they do.

He is a great husband and loves his children deeply. He points them in a great direction and they are successful in what they accomplish, and has been a great help to my granddaughter in the family man that he is.

I have been following the news and what Charles and his family have been going through over the years, and I see how steadfast he has always been. I have included Charles and Carley and their family in prayers, as he is one of the most honest people that I know. Charles has been the center for the family in guiding the children in their studies and pursuits and is all around such an intelligent and kind person.

He is always in my prayers for all of the thoughts and kindness he has shown me since he has been such a great help to me, and I ask that with this, and with his children at such a crucial age in their development, that you show mercy on Charles so that the kids can continue to look up to this gentle man.

Thank you for your time and consideration, Honorable Judge Kendall.

Sincerely,

pp Carley Cui for Aline Grange

George S. Bellas  
Peter C. Wachowski  
Vicki M. Gonzalez  
Misty J. Cygan  
Jillian Tattersall  
Tracy A. Ries, Of Counsel



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June 21, 2024

Honorable Virginia M. Kendall  
United States District Court, Northern District of Illinois  
219 South Dearborn Street, Room 2588  
Chicago, Illinois 60604

Re: Charles Cui

Dear Judge Kendall,

I write in support of Charles Cui, who is currently scheduled for a sentencing hearing before you following his conviction for bribery and related charges. I have known Charles for over 5 years professionally and have established a close personal relationship with him. I have represented his business in employment related matters.

Most significantly I have been referring individuals to Charles for assistance in immigration matters for the past 5 years. He is one of the most experienced and able immigration lawyers I have ever encountered in my 50+ years of practice. I have observed Charles' treatment of his clients with the upmost regard for their best interests. He places the best interests of his clients above any other consideration and further considers their financial wherewithal. Charles has proven to be a honorable person whose promise to his clients is his bond. He has honored his obligations to his clients and, therefore, should be trusted to comply with the terms of any sentence the Court deems appropriate.

Lastly, I must mention his commitment to his family. He is very protective of their well-being. He takes particular pride in the accomplishments of his son and has provided him with instruction to advance his golfing skills. He has faced his current situation with the Court with dignity, humility and respect for the judgment of the Court.

He is somebody who can be trusted to comply with any sentence that the Court imposes. I know him to honor his obligations. When he has committed to a certain course of action for his clients, he honors that commitment and strives to protect his client's best interests. Thank you for your consideration of the above.

Very truly yours,

A handwritten signature in cursive script, appearing to read "George S. Bellas", is written in dark ink.

George S. Bellas  
Attorney at Law



Prashanth Mahakali  
1111 North Dearborn Street  
Chicago, IL 60610

1111 North Dearborn Street  
Chicago, IL 60610

Dated: Feb. 22, 2024

Honorable Virginia M. Kendall  
United States District Court  
Northern District of Illinois

Dear Judge Kendall,

Please be informed that I have known Mr. Cui for about 20 years. I have cherished a valuable professional relationship with him for all these years. He helped me with my immigration / work visa matter when every other attorney turned me down. I was a desperate young Architect and Mr. Cui not only assured but also delivered his best professional services. He was there every step of my journey from being a professional with a work visa to a citizen and successful business owner having created many jobs for others.

I have referred many people in similar and much complex situations to him and he has provided them with the best professional service with the utmost care. He is the reason why many professionals like me continue to thrive in the United States.

He is somebody that can be trusted to comply with any sentence that the Court imposes. I know him to honor legal obligations. For example, one of the cases involved an intern at my office who had overstayed her visa. She was given several false assurances by others but Mr. Cui told her that she had to return to her country and start the process of legal immigration. While she did not like it, she understood that he conveyed to her the rule of law and how he would support her every step until she was approved to enter the country again. She is now a successful professional and is happily married.

Thank you for your consideration of the above.

Sincerely,

Prashanth Mahakali, AIA

A handwritten signature in black ink, appearing to read "Prashanth Mahakali", written over a light blue horizontal line. The signature is stylized and cursive.

EMPOWERMENT BY DESIGN

July 23, 2024

McKenna Guertin



Honorable Virginia M. Kendall  
United States District Court  
Northern District of Illinois

Dear Judge Kendall,

I am writing to provide a character reference for Mr. Charles Cui, who is currently before your court. I have known Mr. Cui for four years in my capacity as the Business Immigration Manager of his previous immigration law firm.

Throughout our professional relationship, Mr. Cui has consistently demonstrated honesty, diligence, and reliability. As a lawyer, he not only excelled in his profession but also generously provided opportunities to others. It was Mr. Cui who offered me my first job, laying the foundation for my successful career. His mentorship has been instrumental in my professional development, and I am eternally grateful for his belief in my potential when others did not.

Mr. Cui's dedication to his clients is unparalleled. Among thousands of cases, he has worked tirelessly to represent individuals, treating each client with genuine care and respect. I have witnessed firsthand the positive impact he has made, particularly through his representations in front of U.S. Citizenship and Immigration Services and Immigration Court. His efforts have changed countless lives, not only as their legal counsel but as a supportive friend.

Beyond his professional achievements, Mr. Cui is deeply committed to his family. He has shown remarkable dedication to his children, actively supporting their academic and extracurricular pursuits. His involvement has undoubtedly contributed to their success in their respective fields.

I fully understand the seriousness of the charges against Mr. Cui and do not wish to minimize the gravity of the situation. However, I respectfully ask that you consider his exemplary past behavior and potential for rehabilitation when making your decision. I firmly believe that Mr. Cui is someone who can be trusted to comply with any sentence the court imposes.

Thank you for taking the time to read this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'McKenna Guertin'.

McKenna Guertin

Amalfi Diaz



February 22, 2024

Honorable Virginia M. Kendall  
United States District Court  
Northern District of Illinois

Dear Judge Kendall,

My name is Amalfi Diaz, and I am writing this letter to provide insight into the character of Mr. Charles Cui. I have had the privilege of knowing Mr. Cui for the past 19 years, having worked closely with him for the majority of that time.

Throughout my years of acquaintance with Mr. Cui, I have observed him as a devoted family man. He consistently demonstrates unwavering dedication to his children, taking immense pride in their accomplishments, such as their achievements in professional golf. Mr. Cui frequently spoke fondly of his children, expressing his hopes and aspirations for their future endeavors.

Moreover, Mr. Cui approaches his work with a level of dedication and professionalism that is truly commendable. He invests significant time and effort into ensuring that his clients' needs are met, often working more than 8 hours a day to deliver exceptional service. His commitment to his clients and cases is evident in the long hours he devotes to his work, demonstrating a strong work ethic and a genuine desire to make a positive impact.

In addition to his commitment to his family and work, Mr. Cui has proven himself to be a trustworthy individual who can be relied upon to adhere to any sentence imposed by the court.

Thank you for taking the time to consider the information provided above.

Sincerely,

A handwritten signature in black ink, appearing to read "Amalfi Diaz".

Amalfi Diaz

Dated: 06/29/2024

Honorable Virginia M. Kendall  
United States District Court  
Northern District of Illinois

Dear Judge Kendall,

I am writing to provide a character reference for Charles H. Cui. I am a distant niece of Charles. I came to the United States in 2012 as a college student. Despite having had little prior acquaintance, Uncle Charles showed his kindness and support upon my arrival.

He played a pivotal role in facilitating my transition to American college life, providing guidance with his personal experience as I navigated through cultural differences, so that I didn't have to face the same hardships he encountered.

After college, I faced job challenges and needed a place to stay. Uncle Charles welcomed me into his home as part of his own family, offering not just hospitality but also emotional support during trying times.

Notably, when the opportunity arose, he represented me during the process of obtaining permanent residence status, generously providing his services without any legal fees. His selflessness and dedication to family shine through in every action he takes.

Uncle Charles' unwavering commitment to family, evident in his roles as a loving father and faithful husband, along with his contributions to society as a good Samaritan, make him a truly remarkable individual. I am deeply grateful for the times he has stepped in to support me, and I wholeheartedly vouch for his character without any reservations.

Thank you for considering my perspective. Should you require any further information, please feel free to contact me.

Sincerely,

Di Chen



*Di Chen*

Signed

July 9, 2024

Honorable Virginia M. Kendall  
United States District Court  
Northern District of Illinois

Dear Judge Kendall,

Please be informed that I have known Mr. Cui for 12 years. My relationship to him is a longtime friend. He is a very involved and loving father, as well as a charitable and engaged member of our community.

Our families met when our children were in preschool at First Presbyterian Church in Lake Forest. Mr. Cui and his family have generously hosted events at their home, allowing wonderful memories to be made by the children and their families. He is charitable towards schools as evidenced by his donations to school fundraisers that improved technology and playgrounds. Mr. Cui also regularly donates to Christ Church in Lake Forest, which is the church his family attends.

He is often present as a very a dedicated father not only in school activities, but also in the community. For example, he has helped organize and host events for the Fox Nation Indian Guides and Princesses. Mr. Cui extends his charitable acts beyond local organizations by donating and supporting national golf organizations to promote youth golf, especially for those who do not have financial resources.

I know Mr. Cui to have been honorable in all interactions. He is somebody that can be trusted to comply with any sentence that the Court imposes. He is loved dearly by his family and friends, and cherished and valued by those in our community, and beyond.

Thank you for your consideration of the above.

Sincerely,



Karena Garriques



Dated: July 8, 2024

Honorable Virginia M. Kendall  
United States District Court  
Northern District of Illinois

Dear Judge Kendall,

Please be informed that I have known Mr. Cui for approximately 10 years. Mr. Cui's children attended the same schools as my children and our families became friends.

I know Mr. Cui to have been a dedicated father and family man who could frequently be seen at the golf course watching or golfing with his children who are talented golfers. Our families would also play golf together. Mr. Cui was also frequently at various school related events, such as family night or parent teacher conferences. It always seemed that he placed the highest value on his family.

I have also known Mr. Cui to be charitable. For example, when my wife was hosting a fundraiser for a domestic violence shelter, the Cuis purchased tickets as well as following up with a generous donation.

I believe he is somebody that can be trusted to comply with any sentence that the Court imposes.

Thank you for your consideration of the above.

Sincerely,

A handwritten signature in cursive script that reads "Ethan Meister". The signature is written in dark ink and is positioned above a horizontal line.

Ethan Meister