

BEFORE THE HEARING BOARD
OF THE
ILLINOIS ATTORNEY AND REGISTRATION
AND
DISCIPLINARY COMMISSION

In the Matter of:

GIULIO PALMA,

Respondent,

No. 6315108.

Commission No. 2025PR00002

COMPLAINT

Lea S. Gutierrez, Administrator of the Attorney Registration and Disciplinary Commission, by her attorney, Richard Gleason, pursuant to Supreme Court Rule 761(d), complains of Respondent, Giulio Palma, who was licensed to practice law in Illinois on April 22, 2014, and alleges that Respondent has engaged in the following conduct which subjects Respondent to discipline pursuant to Supreme Court Rule 770.

(Conviction for wire fraud)

A. Procedural History of Respondent's Case

1. On October 1, 2020, a grand jury sitting in the Northern District of Illinois, Eastern Division, issued a true bill charging Respondent with seven counts of wire fraud with devising, intending to devise and participating in a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representation and promises in violation of Title 18, United States Code, Section 1343. The Matter was captioned United States of America v. Giulio Palma, docket number 1:20-cr-10016-LTS, and assigned to the Honorable Robert W. Gettleman.

2. On December 21, 2020, Respondent was arraigned on the indictment and entered a plea of not guilty to all counts. Between October 23, 2023 and November 2, 2023, a jury trial was held in *United States of America v. Giulio Palma*. On November 2, 2023, the jury returned a

partial verdict against Respondent, finding Respondent guilty of six counts of wire fraud, in violation of Title 18, United States Code, Section 1343.

3. On January 10, 2025, Judge Gettleman entered a judgment of conviction on Counts One-through-Five and Count Seven of the indictment, and sentenced Respondent to a concurrent term of imprisonment of 36 months on all counts. In addition, Judge Gettleman sentenced Respondent to two years of supervised release upon his release from prison and ordered Respondent to pay restitution in the amount of \$5,868,744.92 to five of the individuals or entities Respondent defrauded.

B. Summary of the Criminal Charges

4. The October 1, 2020 indictment alleged that between 2014 and 2024, Respondent held dual citizenship in both the United States and Italy, and that he held himself out to the public as engaging in the business of acquiring and developing real estate.

5. The indictment alleged that beginning in or about July 2015 and continuing through August of 2019, Respondent caused several investors to invest over \$5,000,000 towards the purchase and development of real estate in Italy based on false representations regarding the intended use of the funds, Respondent's compensation, his personal investment in the properties, and the status of the real estate transactions. The indictment further alleged that Respondent also represented to investors and caused others to falsely represent to investors that he intended to use their investments to purchase and develop real estate in Italy, when Respondent actually intended to use a significant portion of the investors' funds for other purposes, including for personal purposes such as paying for jewelry, family vacations and for his own personal healthcare.

6. The indictment further alleged that Respondent falsely represented to investors, and caused others to falsely represent to investors, that Respondent would not receive any compensation for purchasing or developing the real estate until the transactions closed or until

profits were generated by the sale or rental of the properties when, in fact, Respondent used investor funds for his own personal purposes and expenses before any closings took place and any profits were generated.

7. The indictment further alleged that Respondent falsely represented to investors that he had contributed specific amounts of his own funds towards the purchase and development of properties in Italy, including using his own money to pay off a corporate credit card when, in fact, Respondent had not contributed such amounts. The indictment alleged that Respondent also provided false information to investors about the status of certain real estate transactions in Italy, including the amounts purportedly paid for certain properties and the status of such transactions.

8. The indictment further alleged that Respondent opened accounts at Chase Bank in the name of Ko-Ro Investments, LLC, which was an Illinois corporation created by one of the investors, for the purpose of depositing investments from investors, and later deposited investments into those accounts from the investors. The indictment alleged that Respondent converted those investor funds to his personal purposes by transferring those funds to his own personal banking account, using the funds to pay off personal charges on credit cards opened in the name of Ko-Ro Investments, and withdrawing cash from Ko-Ro Investments accounts. The indictment further alleged that Respondent made false representations to an accountant who prepared financial statements for Ko-Ro Investments and other related entities, including false statements about the use of funds he transferred to his personal accounts, to conceal his misuse of investor funds. The indictment alleged that Respondent concealed, misrepresented, and hid, and caused to be concealed, misrepresented, and hidden, the existence of the scheme, the purposes of the scheme, and the acts done in furtherance of the scheme.

9. Count One of the indictment alleged that Respondent committed the offense of wire fraud when on January 31, 2019, in furtherance of his scheme, he caused to be transmitted an

interstate transfer of funds from an account at North Community Bank to an account at Chase Bank through the Fedwire Funds Service in the amount of approximately \$80,000, representing the funds of an investor, in violation of Title 18, United States Code, Section 1343.

10. Count Two of the indictment alleged that Respondent committed the offense of wire fraud when on January 29, 2019, in furtherance of his scheme, he caused to be transmitted an interstate transfer of funds from an account at North Community Bank to an account at Chase Bank through the Fedwire Funds Service in the amount of approximately \$1,000,000 representing the funds of an investor, in violation of Title 18, United States Code, Section 1343.

11. Count Three of the indictment alleged that Respondent committed the offense of wire fraud when on January 18, 2018, in furtherance of his scheme, he caused to be transmitted an interstate transfer of funds from an account at Wells Fargo Bank to an account at Chase Bank through the Fedwire Funds Service in the amount of approximately \$200,000, representing the funds of an investor, in violation of Title 18, United States Code, Section 1343.

12. Count Four of the indictment alleged that Respondent committed the offense of wire fraud when on December 7, 2017, in furtherance of his scheme, he caused to be transmitted an interstate transfer of funds from an account at Wells Fargo Bank to an account at Chase Bank through the Fedwire Funds Service in the amount of approximately \$150,000, representing the funds of an investor, in violation of Title 18, United States Code, Section 1343.

13. Count Five of the indictment alleged that Respondent committed the offense of wire fraud when on May 27, 2016, in furtherance of his scheme, he caused to be transmitted an interstate transfer of funds from an account at Wells Fargo Bank to an account at Chase Bank through the Fedwire Funds Service in the amount of approximately \$425,000, representing the funds of two investors, in violation of Title 18, United States Code, Section 1343.

14. Count Six of the indictment alleged that Respondent committed the offense of wire fraud when on April 29, 2016, in furtherance of his scheme, he caused to be transmitted an interstate wire communication related to Chase Bank's processing of a check in the amount of \$140,000 drawn on First Republic Bank, representing the funds of two investors, in violation of Title 18, United States Code, Section 1343.

15. Count Seven of the indictment alleged that Respondent committed the offense of wire fraud when on December 14, 2015, Respondent caused to be transmitted an interstate wire communication related to Chase Bank's processing of a check in the amount of \$25,000 drawn on an account at First Republic Bank, representing the funds of an investor, in violation of Title 18, United States Code, Section 1343.

16. As a result of the order of conviction described in paragraph three, above, Respondent has engaged in the following misconduct:

- a. committing a criminal act that reflects adversely on his honesty, trustworthiness, or fitness as a lawyer in other respects, by committing the criminal offense of wire fraud in violation of Title 18, United States Code, Section 1343 and Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010); and
- b. conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including committing the criminal offense of wire fraud in violation of Title 18, United States Code, Section 1343, in which he engaged in a years-long course of action in which he defrauded investors of funds as part of a fraudulent real estate scheme, in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

WHEREFORE, the Administrator respectfully requests that this matter be assigned to a panel of the Hearing Board, that a hearing be held pursuant to Rule 761(d), and that the panel make findings of fact, conclusions of fact and law, and a recommendation for such discipline as is warranted.

Respectfully submitted,

Lea S. Gutierrez, Administrator
Attorney Registration and
Disciplinary Commission

By: /s/ Richard Gleason
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