

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	Case No.
	)	
v.	)	Violations: Title 21, United States
	)	Code, Section 846 & 841(a)(1).
DAVID PALM; and	)	
ALVIN BROWN	)	
	)	
	)	

**COUNT ONE**

The SPECIAL JANUARY 2019 GRAND JURY charges:

Beginning no later than on or about April 22 2019, and continuing until at least on or about April 29, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DAVID PALM, and  
ALVIN BROWN,

defendants herein, did conspire with Andres Villegas and Gustavo Avila, and others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

**COUNT TWO**

The SPECIAL JANUARY 2019 GRAND JURY further charges:

On or about April 25, 2019, at Chicago, in the Northern District of Illinois,  
Eastern Division, and elsewhere,

DAVID PALM, and  
ALVIN BROWN,

defendants herein, did knowingly and intentionally possess with intent to distribute  
a controlled substance, namely, 500 grams or more of a mixture and substance  
containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18,  
United States Code, Section 2.

## FORFEITURE ALLEGATION

The SPECIAL JANUARY 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846, as set forth in this Indictment, defendants DAVID PALM and ALVIN BROWN shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Sections 853(a).

2. The property to be forfeited includes, but is not limited to the following specific property: a 2016 Nissan Sentra, VIN 3N1AB7AP6GY300311.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
UNITED STATES ATTORNEY