

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	Case No. 20 CR 129
)	
v.)	Violations: Title 21, United States
)	Code, Section 846 & 841(a)(1), and
ISIDRO MOYA;)	Title 18, United States Code,
and EDUARDO CARRIZALES)	Section 1956(a)(1)(B)(i).
)	
)	

COUNT ONE

The SPECIAL JANUARY 2019 GRAND JURY charges:

Beginning no later than on or about September 2, 2019, and continuing until at least on or about October 7, 2019, at Bolingbrook, in the Northern District of Illinois, Eastern Division, and elsewhere,

ISIDRO MOYA, and
EDUARDO CARRIZALES,

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 October 7, 2019, at Bolingbrook, in the Northern District of Illinois, Eastern Division, and elsewhere,

ISIDRO MOYA, and
EDUARDO CARRIZALES,

defendants herein, did knowingly and intentionally 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), and Title 18, United States Code, Section 2.

COUNT THREE

The SPECIAL JANUARY 2019 GRAND JURY further charges:

On or about October 7, 2019, at Bolingbrook, in the Northern District of Illinois, Eastern Division, and elsewhere,

ISIDRO MOYA, and
EDUARDO CARRIZALES,

defendants herein, did knowingly conduct a financial transaction affecting interstate and foreign commerce, namely, the transfer of approximately \$150,020, which involved the proceeds of a specified unlawful activity, that is the felonious buying and selling and otherwise dealing in a controlled substance, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, location, source, ownership, and control, of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

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 ISIDRO MOYA and EDUARDO CARRIZALES 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. Upon conviction of an offense in violation of Title 18, United States Code, Section 1956, as set forth in this Indictment, defendants ISIDRO MOYA and EDUARDO CARRIZALES shall forfeit to the United States of America any property involved in such offense, and any property traceable to such property, as provided in Title 18, United States Code, Section 982(a)(1).

3. The property to be forfeited includes, but is not limited to the following specific property: approximately \$150,020 seized by law enforcement on October 7, 2019, from a vehicle used by EDUARDO CARRIZALES.

4. 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