

**FILED** *h*

OCT 24 2019 *h*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

ROBERTO VELAZQUEZ MARTINEZ,  
also known as "Rafael"

No. 19 CR 768

Violation: Title 21, United  
States Code, Section 846

**JUDGE LEFKOW**

**MAGISTRATE JUDGE CUMMINGS**

The SPECIAL JULY 2018 GRAND JURY charges:

Beginning no later than on or about October 23, 2018, and continuing until on or about December 4, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROBERTO VELAZQUEZ MARTINEZ, also known as "Rafael," defendant herein, did conspire with Individuals A, B, C, D, 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.

**FORFEITURE ALLEGATION**

The SPECIAL JULY 2018 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Section 846, as set forth in this Indictment, defendant 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, Section 853(a).

2. The property to be forfeited includes, but is not limited to funds in the amount of approximately \$145,000, seized on or about December 4, 2018, which represents the proceeds of the narcotics trafficking crimes alleged in the foregoing Indictment.

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:

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FOREPERSON

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