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2/9/2021

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

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CAMILO ALVAREZ,  
JOSE HERNANDEZ RAMIREZ,  
INES CHAVEZ RODRIGUEZ, also known  
as "Perikito," and  
LOUIS REYES VELEZ

Violation: Title 21, United  
States Code, Section 846

UNDER SEAL

**1:21-cr-00099**

**JUDGE BLAKEY  
MAGISTRATE JUDGE MCSHAIN**

COUNT ONE

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

1. 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,

CAMILO ALVAREZ,  
JOSE HERNANDEZ RAMIREZ,  
INES CHAVEZ RODRIGUEZ, also known as "Perikito," and  
LUIS REYES VELEZ,

defendants herein, did conspire with Individual A, 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.

2. Before CAMILO ALVAREZ committed the offense charged, CAMILO ALVAREZ had a final conviction for a serious drug felony, namely, a conviction in Case No. 2012 CR 143 (District of Minnesota), for conspiracy to distribute 500 grams or more cocaine, and 100 grams or more of heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 846, for which he served more than 12 months' imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT TWO

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about December 4, 2018, at Stickney, in the Northern District of Illinois, Eastern Division, and elsewhere,

LUIS REYES VELEZ,

defendant herein, did attempt to knowingly and intentionally possess with intent to 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 NOVEMBER 2019 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, defendants 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

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signed by Erika Csicsila on behalf of the  
UNITED STATES ATTORNEY