

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), and
ANDRES VILLEGAS;	)	Title 18, United States Code,
SANTIAGO MERAZ;	)	Section 1956(a)(1)(B)(i).
and JORGE VALDEZ	)	
	)	

**COUNT ONE**

The SPECIAL JANUARY 2019 GRAND JURY charges:

Beginning no later than on or about September 4, 2019, and continuing until at least on or about October 1, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ANDRES VILLEGAS,  
SANTIAGO MERAZ, and  
JORGE VALDEZ,

defendants herein, did conspire 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 1, 2019, at Chicago, in the Northern District of Illinois,  
Eastern Division, and elsewhere,

SANTIAGO MERAZ, and  
JORGE VALDEZ,

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.

**COUNT THREE**

The SPECIAL JANUARY 2019 GRAND JURY further charges:

On or about October 1, 2019, at Chicago, in the Northern District of Illinois,  
Eastern Division, and elsewhere,

ANDRES VILLEGAS,

defendant herein, did knowingly and intentionally 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.

**COUNT FOUR**

The SPECIAL JANUARY 2019 GRAND JURY further charges:

On or about October 1, 2019, at Chicago, in the Northern District of Illinois,  
Eastern Division, and elsewhere,

ANDRES VILLEGAS,  
SANTIAGO MERAZ, and  
JORGE VALDEZ,

defendants herein, did knowingly conduct a financial transaction affecting interstate and foreign commerce, namely, the transfer of approximately \$155,020, 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 ANDRES VILLEGAS, SANTIAGO MERAZ, and JORGE VALDEZ 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 ANDRES VILLEGAS, SANTIAGO MERAZ, and JORGE VALDEZ 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).

2. The property to be forfeited includes, but is not limited to the following specific property:

- a. a white 2018 Jaguar 4-door, VIN SADCM2FV3JA250946; and
- b. approximately \$155,020 seized by law enforcement on October 1, 2019, from a vehicle used by SANTIAGO MERAZ.

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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UNITED STATES ATTORNEY