

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

14 CR 623

v.

JORGE MARTIN TORRES

Violation: Title 18, United States
Code, Section 1956(h).

The SPECIAL JULY 2013 GRAND JURY charges:

Beginning in or about December 2012, and continuing until in or about October 2014, in the Northern District of Illinois, Eastern Division, and elsewhere,

JORGE MARTIN TORRES,

defendant herein, did conspire with Individual A, Individual B, Individual C, Individual D, and with persons known and unknown to the Grand Jury, to commit an offense in violation of Title 18, United States Code, Section 1956, namely: to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside of the United States and from a place outside the United States to and through a place inside the United States with the intent to promote the carrying on of a specified unlawful activity, namely felony violations of Title 21, United States Code, Sections 841, 846, 952, 959, 960, and 963 involving buying, selling,

importing, and otherwise dealing in a controlled substance, in violation of Title 18, United States Code, Section 1956(a)(2)(A);

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

The SPECIAL JULY 2013 GRAND JURY alleges:

1. The allegations in this indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

2. As a result of his violation of Title 18, United States Code, Section 1956(h), as alleged in the foregoing Indictment,

JORGE MARTIN TORRES,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all right, title and interest he may have in property, real or personal, involved in such offense, or any property traceable to such property.

3. The interests of the defendant, jointly and severally, subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 982(a)(1), include, but are not limited to, approximately \$1,000,000.

4. If any of the forfeitable property described above, as a result of any act or omission by defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) 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, under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1);

All pursuant to Title 18, United States Code, Section 982(a)(1).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY