

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CAMERON CALLISON, aka “Kobe,”  
JUAN ALCARAZ, aka “Little Homie,” and  
VICTOR RAMIREZ, aka “Savage”

~~UNDER SEAL~~

Case No.

Violations: Title 18, United States  
Code, Sections 1959(a)(1) and 2 and  
922(g)

COUNT ONE

The SPECIAL MAY 2022 GRAND JURY charges:

At times material to this Indictment:

1. The defendants, CAMERON CALLISON, aka “Kobe,” JUAN ALCARAZ, aka “Little Homie,” VICTOR RAMIREZ, aka “Savage,” and others known and unknown, were members and associates of the Ambrose street gang, a criminal organization whose members and associates engaged in acts of violence, including but not limited to acts involving murder and assault as well as dealing in controlled substances, and which operated in and around the South Side of Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere.

2. The Ambrose street gang, including its leadership, membership, and associates, constituted an “enterprise,” as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which engaged in, and the activities of which affected, interstate and foreign commerce.

3. The Ambrose enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

4. The purposes of the Ambrose enterprise included, but were not limited to, the following:

a. Acquiring, preserving, and protecting power, territory, operations, and proceeds for the enterprise through the use of threats, intimidation, and violence, including, but not limited to, murder and other acts of violence, and the illegal trafficking of controlled substances;

b. Promoting and enhancing the enterprise and its members' and associates' activities, including claiming responsibility for acts of violence committed by the enterprise and taunting rival gang members;

c. Increasing the status of the enterprise through the use of social media platforms;

d. Keeping victims, rival gang members, and witnesses in fear of the enterprise and its leaders, members, and associates through acts and threats of violence; and

e. Taking steps designed to prevent law enforcement's detection of the enterprise's criminal activities.

5. At times relevant to this Indictment, the Ambrose enterprise, through its leadership, membership, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely:

a. Acts involving murder, in violation of the laws of the State of Illinois; and

b. Offenses involving narcotics trafficking, in violation of Title 21, United States Code, Sections 841 and 846.

6. On or about June 17, 2019, at Chicago, in the Northern District of Illinois, Eastern Division,

CAMERON CALLISON, aka “Kobe,”  
JUAN ALCARAZ, aka “Little Homie,” and  
VICTOR RAMIREZ, aka “Savage,”

defendants herein, for the purpose of gaining entrance, maintaining, and increasing position in the Ambrose street gang, an enterprise engaged in racketeering activity, did knowingly commit the murder of an individual, namely, Victor Ochoa, aka “P” or “Pigeon,” in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/9-1, 5/5-1, and 5/5-2);

In violation of Title 18, United States Code, Section 1959(a)(1) and 2.

**NOTICE OF SPECIAL FINDINGS FOR COUNT ONE**

1. The allegations set forth in Paragraphs 1 through 6 of Count One of this Indictment are incorporated here.

2. The defendants CAMERON CALLISON, JUAN ALCARAZ, and VICTOR RAMIREZ:

a. Were eighteen years of age or older at the time of the offense (Title 18, United States Code, Section 3591(a)(2));

b. Intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));

c. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

d. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense (Title 18, United States Code, Section 3592(c)(5)); and

e. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)).

**COUNT TWO**

The SPECIAL MAY 2022 GRAND JURY charges:

On or about June 17, 2019, at Chicago, in the Northern District of Illinois,  
Eastern Division,

CAMERON CALLISON,

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Sturm, Ruger, and Company, Model P95, 9mm handgun, serial number 31684182, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL:

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FOREPERSON

*Morris Pasqual* by SME  
\_\_\_\_\_  
ACTING UNITED STATES ATTORNEY