

**FILED**  
10/16/2024  
THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT  
MEN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

Case No. 24 CR 439

v.

Violations: Title 18, United States  
Code, Sections 2113(a) and 924(c)(1)(A)

GERMAN CAMPOS JR

**COUNT ONE**

**1:24-cr-00439**  
**Judge Thomas M. Durkin**  
**Magistrate Judge Maria Valdez**  
**RANDOM / CAT.4**

The SPECIAL APRIL 2024 GRAND JURY charges:

On or about October 18, 2023, at Schaumburg, in the Northern District of  
Illinois, Eastern Division,

GERMAN CAMPOS JR,

defendant herein, by force and violence, and by intimidation, took from the person  
and presence of a bank employee approximately \$6,991 in United States currency  
belonging to, and in the care, custody, control, management, and possession of the  
U.S. Bank located at 60 South Meacham Road, Schaumburg, Illinois, the deposits of  
which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Section 2113(a).

**COUNT TWO**

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about October 18, 2023, at Schaumburg, in the Northern District of Illinois, Eastern Division,

GERMAN CAMPOS JR,

defendant herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, bank robbery, in violation of Title 18, United States Code, Section 2113(a), as charged in Count One of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT THREE**

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about December 16, 2023, at Elmhurst, in the Northern District of Illinois, Eastern Division,

GERMAN CAMPOS JR,

defendant herein, by intimidation, took from the person and presence of a bank employee approximately \$5,532 in United States currency belonging to, and in the care, custody, control, management, and possession of the U.S. Bank located at 536 South York Street, Elmhurst, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Section 2113(a).

**COUNT FOUR**

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about March 6, 2024, at Schaumburg, in the Northern District of Illinois,  
Eastern Division,

GERMAN CAMPOS JR,

defendant herein, by force and violence, and by intimidation, took from the person  
and presence of a bank employee approximately \$14,662 in United States currency  
belonging to, and in the care, custody, control, management, and possession of the  
U.S. Bank located at 60 South Meacham Road, Schaumburg, Illinois, the deposits of  
which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Section 2113(a).

**COUNT FIVE**

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about March 6, 2024, at Schaumburg, in the Northern District of Illinois,  
Eastern Division,

GERMAN CAMPOS JR,

defendant herein, did use, carry, and brandish a firearm during and in relation to a  
crime of violence for which he may be prosecuted in a court of the United States,  
namely, bank robbery, in violation of Title 18, United States Code, Section 2113(a),  
as charged in Count Four of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT SIX**

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about June 13, 2024, at Elmhurst, in the Northern District of Illinois,  
Eastern Division,

GERMAN CAMPOS JR,

defendant herein, by force and violence, and by intimidation, took from the person  
and presence of a bank employee approximately \$4,925 in United States currency  
belonging to, and in the care, custody, control, management, and possession of the  
U.S. Bank located at 536 South York Street, Elmhurst, Illinois, the deposits of which  
were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Section 2113(a).

**COUNT SEVEN**

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about June 13, 2024, at Elmhurst, in the Northern District of Illinois,  
Eastern Division,

GERMAN CAMPOS JR,

defendant herein, did use, carry, and brandish a firearm during and in relation to a  
crime of violence for which he may be prosecuted in a court of the United States,  
namely, bank robbery, in violation of Title 18, United States Code, Section 2113(a),  
as charged in Count Six of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT EIGHT**

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about August 9, 2024, at Park Ridge, in the Northern District of Illinois,  
Eastern Division,

GERMAN CAMPOS JR,

defendant herein, by force and violence, and by intimidation, took from the person  
and presence of a bank employee approximately \$3,858 in United States currency  
belonging to, and in the care, custody, control, management, and possession of the  
BMO Bank located at 615 Busse Highway, Park Ridge, Illinois, the deposits of which  
were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Section 2113(a).



**COUNT NINE**

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about August 9, 2024, at Park Ridge, in the Northern District of Illinois,  
Eastern Division,

GERMAN CAMPOS JR,

defendant herein, did use, carry, and brandish a firearm during and in relation to a  
crime of violence for which he may be prosecuted in a court of the United States,  
namely, bank robbery, in violation of Title 18, United States Code, Section 2113(a),  
as charged in Count Eight of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT TEN**

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about August 28, 2024, at Niles, in the Northern District of Illinois,  
Eastern Division,

GERMAN CAMPOS JR,

defendant herein, by force and violence, and by intimidation, took from the person  
and presence of a bank employee approximately \$16,312 in United States currency  
belonging to, and in the care, custody, control, management, and possession of the  
U.S. Bank located at 8500 West Dempster Street, Niles, Illinois, the deposits of which  
were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Section 2113(a).

**COUNT ELEVEN**

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about August 28, 2024, at Niles, in the Northern District of Illinois,  
Eastern Division,

**GERMAN CAMPOS JR,**

defendant herein, did use, carry, and brandish a firearm during and in relation to a  
crime of violence for which he may be prosecuted in a court of the United States,  
namely, bank robbery, in violation of Title 18, United States Code, Section 2113(a),  
as charged in Count Ten of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**FORFEITURE ALLEGATION**

The SPECIAL APRIL 2024 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 924(c) or Section 2113(a), as set forth in this Indictment, defendant shall forfeit to the United States of America, any firearm and ammunition:

a. involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c); and

b. found in the possession or under the immediate control of the defendant at the time of arrest, upon conviction of any offense for committing and attempting to commit any felony involving the use of threats, force, and violence, and perpetrated in whole or in part by the use of firearms, as provided in 18 U.S.C. § 3665.

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 2113(a), as set forth in this Indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

3. The property to be forfeited includes, but is not limited to:

a. approximately \$3,491 in United States currency seized from 3029 Ruth Street Apartment D, Franklin Park, Illinois on or about September 17, 2024; and

b. A Beretta Model M9 nine-millimeter semi-automatic pistol, bearing serial number M9-007780CA, and associated ammunition.

4. If any of the property described above, as a result of any act or omission by the 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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ACTING UNITED STATES ATTORNEY