

RECEIVED

12/4/2025

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

LUIS URIBE

1:25-cr-00773

Judge Elaine E. Bucklo

No. **Magistrate Judge Jeffrey T. Gilbert**
RANDOM/Cat. 4

Violations: Title 18, United States Code,
Sections 242 and 924(c)(1)(A)(ii)

~~UNDERSEAL~~

COUNT ONE

The SPECIAL JUNE 2024 GRAND JURY charges:

1. At times material to this Indictment:

a. Defendant LUIS URIBE was employed by United States Customs and Border Protection (“CBP”) as an officer, and was assigned primarily to O’Hare Airport, located in Chicago, Illinois.

b. As a CBP officer, LUIS URIBE acted as both a customs officer and immigration officer, and had authority to, among other things, carry a firearm and make arrests for felony and other offenses under certain circumstances.

c. Pursuant to Illinois state law, as a CBP officer, LUIS URIBE was a “peace officer” in Illinois, with the power to make arrests throughout the state of Illinois under certain circumstances.

2. On a date between on or about February 5, 2022 and on or about February 23, 2022, at Schaumburg, in the Northern District of Illinois, Eastern Division,

LUIS URIBE,

defendant herein, while acting under color of law, willfully deprived Victim A of the right not to be deprived of liberty without due process of law, a right secured and protected by the Constitution and the laws of the United States, when, by force and threatening and placing Victim A in fear that she would be subjected to death, or serious bodily injury, he attempted to contact Victim A's mouth with his penis without Victim A's consent, which conduct included an attempt to commit aggravated sexual abuse of Victim A;

In violation of Title 18, United States Code, Section 242.

COUNT TWO

1. The allegations of paragraph 1 of Count One are incorporated here.

2. On a date between on or about February 5, 2022 and on or about February 23, 2022, at Schaumburg, in the Northern District of Illinois, Eastern Division,

LUIS URIBE,

defendant herein, while acting under color of law, willfully deprived Victim A of the right not to be deprived of property without due process of law, a right secured and protected by the Constitution and the laws of the United States, when he took from the presence of Victim A money, which conduct included the use, attempted use, and threatened use of a dangerous weapon;

In violation of Title 18, United States Code, Section 242.

COUNT THREE

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. The allegations of paragraph 1 of Count One are incorporated here.
2. On a date between on or about February 6, 2022 and February 27, 2022, at Naperville, in the Northern District of Illinois, Eastern Division,

LUIS URIBE,

defendant herein, while acting under color of law, willfully deprived Victim B of the right not to be deprived of liberty without due process of law, a right secured and protected by the Constitution and the laws of the United States, when by force and threatening and placing Victim B in fear that she would be subjected to death, or serious bodily injury, he contacted Victim B's mouth with his penis without Victim B's consent, which conduct included aggravated sexual abuse of Victim B;

In violation of Title 18, United States Code, Section 242.

COUNT FOUR

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. The allegations of paragraph 1 of Count One are incorporated here.
2. On a date between on or about February 6, 2022 and February 27, 2022,
at Naperville, in the Northern District of Illinois, Eastern Division,

LUIS URIBE,

defendant herein, while acting under color of law, willfully deprived Victim B of the right not to be deprived of property without due process of law, a right secured and protected by the Constitution and the laws of the United States, when he took from the presence of Victim B money, which conduct included the use, attempted use, and threatened use of a dangerous weapon;

In violation of Title 18, United States Code, Section 242.

COUNT FIVE

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. The allegations of paragraph 1 of Count One are incorporated here.
2. On a date between on or about February 6, 2022 and February 27, 2022, at Naperville, in the Northern District of Illinois, Eastern Division,

LUIS URIBE,

defendant herein, while acting under color of law, willfully deprived Victim B of the right not to be deprived of property without due process of law, a right secured and protected by the Constitution and the laws of the United States, when he took from the presence of Victim B money;

In violation of Title 18, United States Code, Section 242.

COUNT SIX

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. The allegations of paragraph 1 of Count One are incorporated here.
2. On a date between on or about March 1, 2022 and March 18, 2022, at Schaumburg, in the Northern District of Illinois, Eastern Division,

LUIS URIBE,

defendant herein, while acting under color of law, willfully deprived Victim B of the right not to be deprived of liberty without due process of law, a right secured and protected by the Constitution and the laws of the United States, when by force and threatening and placing Victim B in fear that she would be subjected to death, or serious bodily injury, he penetrated Victim B's vulva with his penis without Victim B's consent, which conduct included aggravated sexual abuse of Victim B;

In violation of Title 18, United States Code, Section 242.

COUNT SEVEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. The allegations of paragraph 1 of Count One are incorporated here.
2. On or about October 2, 2022, at Schaumburg, in the Northern District of Illinois, Eastern Division,

LUIS URIBE,

defendant herein, while acting under color of law, willfully deprived Victim C of the right not to be deprived of liberty without due process of law, a right secured and protected by the Constitution and the laws of the United States, when by force and threatening and placing Victim C in fear that she would be subjected to death, or serious bodily injury, he contacted Victim C's mouth with his penis without Victim C's consent and penetrated Victim C's vulva with his penis without Victim C's consent, which conduct included aggravated sexual abuse of Victim C;

In violation of Title 18, United States Code, Section 242.

COUNT EIGHT

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about October 2, 2022, at Schaumburg, in the Northern District of Illinois, Eastern Division,

LUIS URIBE,

defendant herein, did knowingly 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, that is, a violation of Title 18, United States Code, Section 242, as charged in Count Seven of this Indictment;

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

COUNT NINE

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. The allegations of paragraph 1 of Count One are incorporated here.
2. On or about October 2, 2022, at Schaumburg, in the Northern District of Illinois, Eastern Division,

LUIS URIBE,

defendant herein, while acting under color of law, willfully deprived Victim C of the right not to be deprived of property without due process of law, a right secured and protected by the Constitution and the laws of the United States, when he took from the presence of Victim C money, which conduct included the use, attempted use, and threatened use of a dangerous weapon;

In violation of Title 18, United States Code, Section 242.

COUNT TEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. The allegations of paragraph 1 of Count One are incorporated here.
2. On or about October 9, 2022, at Schaumburg, in the Northern District of Illinois, Eastern Division,

LUIS URIBE,

defendant herein, while acting under color of law, willfully deprived Victim D of the right not to be deprived of liberty without due process of law, a right secured and protected by the Constitution and the laws of the United States, when by force and threatening and placing Victim D in fear that she would be subjected to death, or serious bodily injury, he attempted to penetrate Victim D's vulva with his penis without Victim D's consent, which conduct included an attempt to commit aggravated sexual abuse of Victim D;

In violation of Title 18, United States Code, Section 242.

COUNT ELEVEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. The allegations of paragraph 1 of Count One are incorporated here.
2. On or about October 9, 2022, at Schaumburg, in the Northern District of Illinois, Eastern Division,

LUIS URIBE,

defendant herein, while acting under color of law, willfully deprived Victim D of the right not to be deprived of property without due process of law, a right secured and protected by the Constitution and the laws of the United States, when he took from the presence of Victim D money, which conduct included the use, attempted use, and threatened use of a dangerous weapon;

In violation of Title 18, United States Code, Section 242.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY