

APR 11 2019

JUDGE KENNELLY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MAGISTRATE JUDGE HARJANI

UNITED STATES OF AMERICA

v.

ADÁN CASARRUBIAS SALGADO,
also known as, "El Tomate,"
"Tomatito," "Star," and "Silver,"

Case No.

19 CR 321

UNDER SEAL

Violations: Title 18, United States Code,
Sections 1956(a)(2)(B)(i), Title 21, United
States Code, Sections 841(a)(1) and 846

COUNT ONE

The SPECIAL DECEMBER 2017 GRAND JURY charges:

Beginning no later than in or about April 2014, and continuing until in or about June 2014, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADÁN CASARRUBIAS SALGADO, a/k/a "El Tomate," "Tomatito," "Star," and "Silver,"

defendant herein, did conspire with Individual A and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I 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 DECEMBER 2017 GRAND JURY further charges:

On or about June 1, 2014, at Batavia, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADÁN CASARRUBIAS SALGADO, a/k/a “El Tomate,” “Tomatito,” “Star,” and “Silver,”

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I 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 DECEMBER 2017 GRAND JURY further charges:

On or about June 4, 2014, at approximately 12:06 p.m., at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADÁN CASARRUBIAS SALGADO, a/k/a “El Tomate,” “Tomatito,” “Star,” and
“Silver,”

defendant herein, did transport, transmit, and transfer monetary instruments and funds, that is, approximately \$300,000 in United States Currency, from a place in the United States, that is Chicago, Illinois, to a place outside the United States, that is Mexico, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is, the felonious buying, selling, and otherwise dealing in a controlled substance;

In violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i) and 2.

COUNT FOUR

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about June 4, 2014, at approximately 4:16 p.m., at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADÁN CASARRUBIAS SALGADO, a/k/a “El Tomate,” “Tomatito,” “Star,” and
“Silver,”

defendant herein, did transport, transmit, and transfer monetary instruments and funds, that is, approximately \$300,000 in United States Currency, from a place in the United States, that is Chicago, Illinois, to a place outside the United States, that is Mexico, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is, the felonious buying, selling, and otherwise dealing in a controlled substance;

In violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i) and 2.

COUNT FIVE

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about June 6, 2014, at Batavia, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADÁN CASARRUBIAS SALGADO, a/k/a “El Tomate,” “Tomatito,” “Star,” and
“Silver,”

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SIX

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about June 7, 2014, at approximately 12:24 p.m., at Aurora, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADÁN CASARRUBIAS SALGADO, a/k/a “El Tomate,” “Tomatito,” “Star,” and
“Silver,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SEVEN

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about June 7, 2014, at approximately 1:45 p.m., in the Northern District of Illinois, Eastern Division, and elsewhere,

ADÁN CASARRUBIAS SALGADO, a/k/a “El Tomate,” “Tomatito,” “Star,” and
“Silver,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT EIGHT

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about June 8, 2014, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADÁN CASARRUBIAS SALGADO, a/k/a “El Tomate,” “Tomatito,” “Star,” and “Silver,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT NINE

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about June 9, 2014, in the Northern District of Illinois, Eastern Division,
and elsewhere,

ADÁN CASARRUBIAS SALGADO, a/k/a “El Tomate,” “Tomatito,” “Star,” and
“Silver,”

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TEN

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about June 10, 2014, at Aurora, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADÁN CASARRUBIAS SALGADO, a/k/a “El Tomate,” “Tomatito,” “Star,” and “Silver,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT ELEVEN

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about June 12, 2014, at Aurora, in the Northern District of Illinois, Eastern Division, and elsewhere,

ADÁN CASARRUBIAS SALGADO, a/k/a “El Tomate,” “Tomatito,” “Star,” and “Silver,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

The SPECIAL DECEMBER 2017 GRAND JURY further alleges:

1. Upon conviction of offenses in violation of Title 21, United States Code, Sections 841 and 846, as set forth in this Indictment, defendant 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, Section 853(a).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1956, as set forth in this Indictment, defendant 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, a personal money judgment in the amount of approximately \$900,000, which represents the proceeds derived from the offenses alleged in the foregoing Indictment.

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:

FOREPERSON

UNITED STATES ATTORNEY