

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 12 CR 969
v.)	
)	
JOHNNY CHAPARRO,)	
JOHNNY MENDEZ, aka "Trigger,")	
JOSE ARGUIJO,)	Violations: Title 18, United States
ANTHONY MADISON,)	Code, Sections 922(g), 924(c) & 2, and
PAUL JENKINS, aka "Pete,")	Title 21, United States Code, Sections
LAKICHA WHITE,)	841(a)(1) & 846.
DILSON ROCHA,)	
JOEL MELENDEZ, and)	
DWAYNE PAYNE, aka "Murder")	

COUNT ONE

The SPECIAL JANUARY 2012 GRAND JURY charges:

Beginning no later than in or about August 2012 and continuing to in or about December 2, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHNNY CHAPARRO, and
JOHNNY MENDEZ, aka "Trigger,"

defendants herein, did conspire with each other, 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, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, and 1000 grams 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 JANUARY 2012 GRAND JURY further charges:

On or about August 28, 2012, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

JOHNNY CHAPARRO, and
JOHNNY MENDEZ, aka "Trigger,"

defendants herein, did knowingly and intentionally distribute a controlled substance,
namely, a quantity 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 JANUARY 2012 GRAND JURY further charges:

On or about August 28, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DWAYNE PAYNE, aka "Murder,"

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, a quantity 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).

COUNT FOUR

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about September 3, 2012, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

JOSE ARGUIJO,

defendant herein, did knowingly and intentionally distribute a controlled substance,
namely, 5 kilograms or more of a mixture and substance containing a detectable
amount of cocaine, a Schedule II Controlled Substance;

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

COUNT FIVE

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about September 3, 2012, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

JOHNNY CHAPARRO,

defendant herein, did knowingly and intentionally possess with intent to distribute a
controlled substance, namely, 5 kilograms or more of a mixture and substance
containing a detectable amount of cocaine, a Schedule II Controlled Substance;

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

COUNT SIX

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about September 3, 2012, at approximately 1:59 p.m., at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHNNY CHAPARRO,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

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

COUNT SEVEN

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about September 3, 2012, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

PAUL JENKINS, aka "Pete," and
LAKICHA WHITE,

defendants herein, did knowingly and intentionally possess with intent to distribute
a controlled substance, namely, 500 grams or more of a mixture and substance
containing a detectable amount of cocaine, a Schedule II 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 JANUARY 2012 GRAND JURY further charges:

On or about September 3, 2012, at approximately 2:34 p.m., at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHNNY CHAPARRO,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

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

COUNT NINE

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about September 3, 2012, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

DILSON ROCHA,

defendant herein, did knowingly and intentionally possess with intent to distribute a
controlled substance, namely, 500 grams or more of a mixture and substance
containing a detectable amount of cocaine, a Schedule II Controlled Substance;

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

COUNT TEN

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about September 4, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHNNY CHAPARRO, and
JOHNNY MENDEZ, aka "Trigger,"

defendants herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II 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 JANUARY 2012 GRAND JURY further charges:

On or about September 4, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHNNY CHAPARRO,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

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

COUNT TWELVE

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about September 4, 2012, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

ANTHONY MADISON,

defendant herein, did knowingly and intentionally possess with intent to distribute a
controlled substance, namely, 500 grams or more of a mixture and substance
containing a detectable amount of cocaine, a Schedule II Controlled Substance;

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

COUNT THIRTEEN

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about September 19, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHNNY MENDEZ, aka "Trigger,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 100 grams 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 FOURTEEN

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about September 19, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOEL MELENDEZ,

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 100 grams 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).

COUNT FIFTEEN

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about November 26, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOSE ARGUIJO,

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

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

COUNT SIXTEEN

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about November 30, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHNNY CHAPARRO, and
JOHNNY MENDEZ, aka "Trigger,"

defendants herein, did attempt to knowingly and intentionally possess with intent to distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about November 30, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHNNY CHAPARRO, and
JOHNNY MENDEZ, aka "Trigger,"

defendants herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 1000 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

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

COUNT EIGHTEEN

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about November 30, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHNNY MENDEZ, aka "Trigger,"

defendant herein, previously having 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 loaded Taurus Model PT140 Pro .40 caliber semi-automatic pistol, bearing serial number SZE24867, which firearm had traveled in interstate commerce prior to the defendant's possession of the firearm;

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

COUNT NINETEEN

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about November 30, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHNNY MENDEZ, aka "Trigger,"

defendant herein, did knowingly possess a firearm, namely, loaded Taurus Model PT140 Pro .40 caliber semi-automatic pistol, bearing serial number SZE24867, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Seventeen of this Indictment:

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

FORFEITURE ALLEGATION ONE

The SPECIAL JANUARY 2012 GRAND JURY further alleges:

1. The allegations of Counts One through Seventeen of this Indictment are incorporated here for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of their violations of Title 21, United States Code, Sections 841(a)(1) and 846, as alleged in Counts One through Seventeen of the foregoing Indictment,

JOHNNY CHAPARRO,
JOHNNY MENDEZ, aka "Trigger,"
JOSE ARGUIJO,
ANTHONY MADISON,
DILSON ROCHA,
JOEL MELENDEZ, and
DWAYNE PAYNE, aka "Murder,"

defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2): (1) any and all property constituting and derived from, any proceeds they obtained, directly and indirectly, as a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846; and (2) any and all property used, or intended to be used, in any manner or part, to commit and facilitate the commission of the violations of Title 21, United States Code, Sections 841(a)(1) and 846.

3. The interests of the defendants subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853 include, but are not limited to:

- a. approximately \$758,729, which includes approximately \$209,130 seized on or about November 30, 2012; \$7,760 seized on or about December 2, 2012; and \$19,339 seized on or about December 5, 2012.
- b. The real property located at 3754 N. Oketo, Chicago, Illinois, legally described as:

THE SOUTH HALF OF LOT 5 AND THE NORTH HALF OF LOT 6 IN BLOCK ONE IN SAWIAK AND COMPANY'S FIRST ADDITION TO ADDISON HEIGHTS, A SUBDIVISION OF PART OF LOT 2 IN ASSESSOR'S DIVISION OF THE EAST HALF OF FRACTIONAL SECTION 24, TOWNSHIP 40 NORTH, RANGE 12, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Permanent Real Estate Index Number: 12-24-220-029-0000;

- c. The real property located at 3717 N. Olcott, Chicago, Illinois, legally described as:

LOT 29 IN BLOCK 2 IN SAWIAK AND COMPANY'S FIRST ADDITION TO ADDISON HEIGHTS, A SUBDIVISION OF PART OF THE LOT 2 IN ASSESSOR'S DIVISION OF THE EAST ½ OF FRACTIONAL SECTION 24, TOWNSHIP 40 NORTH, RANGE 12, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Permanent Real Estate Index Number: 12-24-219-018-0000;

- d. a loaded Taurus Model PT140 Pro .40 caliber semi-automatic pistol, bearing serial number SZE24867, and associated ammunition;
- e. a 2001 black Acura Coupe, bearing VIN 19UYA42671A002382;

4. If any of the property described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853(a), as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property belonging to defendant under the provisions of Title 21, United States Code, Section 853(p).

All pursuant to Title 21, United States Code, Section 853.

FORFEITURE ALLEGATION TWO

The SPECIAL JANUARY 2012 GRAND JURY further alleges:

1. The allegations of Count Eighteen and Nineteen of this Indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of his violations of Title 18, United States Code, Sections 922(g)(1) and 924(c), as alleged in this Indictment,

JOHNNY MENDEZ, aka “Trigger,”

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any and all right, title and interest he may have in any property involved in the charged offense.

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) are a Taurus Model PT140 Pro .40 caliber semi-automatic pistol, bearing serial number SZE24867, and associated ammunition.

All pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY