

---

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

**CRIMINAL COMPLAINT**

v.

CASE NUMBER:

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

**UNDER SEAL**

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief:

**Count One**

Beginning no later than in or about November 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 knowingly and intentionally possess with intent to distribute and 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.

**Count Two**

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

I further state that I am a Task Force Officer with the Drug Enforcement Administration, and that this

complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.

\_\_\_\_\_  
Signature of Complainant  
JEROME A. DOMICO  
Task Force Officer, Drug Enforcement Administration

Sworn to before me and subscribed in my presence,

December 12, 2012 at Chicago, Illinois  
Date City and State

JEFFREY COLE, U.S. Magistrate Judge  
Name & Title of Judicial Officer

\_\_\_\_\_  
Signature of Judicial Officer

UNITED STATES DISTRICT COURT            )  
  )  
NORTHERN DISTRICT OF ILLINOIS            )            ss

AFFIDAVIT

I, JEROME A. DOMICO, being duly sworn, state as follows:

1.       I am a Task Force Officer with the Drug Enforcement Administration, and have been so employed for approximately three years. My current responsibilities include the investigation of narcotics trafficking offenses.

2.       This affidavit is submitted in support of a criminal complaint alleging that JOHNNY CHAPARRO (“CHAPARRO”) and JOHNNY MENDEZ, aka “Trigger,” (“MENDEZ”) have violated Title 21, United States Code, Section 846 (Count One), and that LUCIO CUEVAS (“CUEVAS”) has violated Title 21, United States Code, Section 841(a)(1) (Count Two). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging CHAPARRO and MENDEZ with conspiring to possess with the intent to distribute and distribute 500 grams or more of cocaine, and a criminal complaint charging CUEVAS with possession with the intent to distribute 500 grams or more of cocaine, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

3.       This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, my experience and training, and my review of investigative reports and other documents.

## Probable Cause Supporting Complaints

4. Beginning no later than November 2012, DEA and the Chicago Police Department (“CPD”) have been conducting an investigation into the distribution of illegal narcotics in and around the Chicago area by CHAPARRO, MENDEZ, CUEVAS, and others.

### Summary of Probable Cause

5. As set forth in further detail below, on or about November 29, 2012, law enforcement conducted surveillance of a meeting between a suspected illegal narcotics broker (the “Broker”) and CHAPARRO. Based in part upon the events that transpired on November 30, 2012, as well as statements provided to law enforcement by the Supplier, CUEVAS, and MENDEZ, law enforcement believes that, during the meeting, the Broker and CHAPARRO discussed CHAPARRO obtaining two kilograms of cocaine from the Broker’s narcotics supplier (the “Supplier”).

6. Then, again as set forth in further detail below, on or about November 30, 2012, law enforcement, believing that the two kilograms of cocaine would be delivered to CHAPARRO at the residence of CHAPARRO’s co-conspirator, MENDEZ, established surveillance in the area of MENDEZ’s residence. A short time later, law enforcement conducted a traffic stop in the area of MENDEZ’s residence on a vehicle being driven by CUEVAS that law enforcement believed contained the two kilograms of cocaine destined for MENDEZ’s residence. As a result of the traffic stop, law enforcement seized two kilograms of cocaine and a handgun from CUEVAS’s vehicle, and took CUEVAS into custody. Law enforcement then assumed control of CUEVAS’s vehicle and drove around the area of MENDEZ’s residence while law enforcement determined

whether to attempt a controlled delivery of the two kilograms of cocaine to MENDEZ and CHAPARRO at MENDEZ's residence. Before the controlled delivery could take place, however, law enforcement approached the Supplier, who had arrived in the area of MENDEZ's residence, as well as MENDEZ, who was at his own residence. A subsequent search of MENDEZ's residence resulted in, among other things, the seizure of a handgun, two kilograms of heroin, and approximately \$225,000. Based in part upon the events that transpired on November 30, 2012, as well as the statements provided to law enforcement by the Supplier, CUEVAS, and MENDEZ, and the seizure of narcotics on that date, law enforcement believes that CHAPARRO and MENDEZ conspired to possess with the intent to distribute two kilograms of cocaine, and that CUEVAS knowingly and intentionally possessed the two kilograms of cocaine with the intent to distribute them to CHAPARRO and MENDEZ.

#### November 29, 2012

7. According to toll records, on or about November 29, 2012, from between approximately 10:05 a.m. and 5:34 p.m., telephone number 773-562-3249 (the "Broker Phone") (*see* paragraph 20) and telephone number 773-870-8542 ("Chaparro Phone") (*see* paragraph 17) were in contact with one each other approximately 22 times. Based in part upon these toll records, as well as later surveillance (*see* paragraph 9) and information subsequently provided by the Supplier (*see* paragraphs 20-22), law enforcement believes that, on November 29, 2012, between 10:05 a.m. and 5:34 p.m., CHAPARRO and the Broker had multiple telephone conversations during which they arranged to meet with one another in order to discuss an impending narcotics transaction.

8. On or about November 29, 2012, at approximately 5:34 p.m., surveillance established in the area of 2820 N. Cicero, Chicago, Illinois, observed CHAPARRO<sup>1</sup> meeting with an unknown male inside a red Chevy Cobalt vehicle. Approximately two minutes later, the unknown male exited the red Chevy Cobalt and drove away from the area and CHAPARRO drove the red Chevy Cobalt away from the area. Law enforcement initiated roving surveillance on CHAPARRO's vehicle, and a short time later, ceased surveillance on CHAPARRO's vehicle.

November 30, 2012

9. On or about November 30, 2012, at approximately 10:38 a.m., surveillance established in the area of 3754 N. Oketo, Chicago, Illinois (the "CHAPARRO Residence"), which law enforcement previously identified as CHAPARRO's residence,<sup>2</sup> observed CHAPARRO leave the CHAPARRO Residence, enter a gold Mazda vehicle, and depart from the area. At that point, law enforcement initiated roving surveillance.

10. Approximately one minute later, at approximately 10:39 a.m., surveillance observed CHAPARRO arrive in the gold Mazda in the area of 3717 N. Olcott, Chicago, Illinois (the "MENDEZ Residence"), which law enforcement had

---

<sup>1</sup> Law enforcement officers conducting the surveillance had previously reviewed a known booking photograph of CHAPARRO and recognized the driver of the red Chevy Cobalt as CHAPARRO.

<sup>2</sup> On at least 20 occasions prior to November 30, 2012, surveillance established in the area of the Chaparro Residence observed CHAPARRO exiting or entering the residence. In addition, CHAPARRO provided the Chaparro Residence as his address when he spoke with law enforcement on or about November 30, 2012 (*see* paragraph 17).

previously identified as MENDEZ's residence and which is approximately two blocks from the CHAPARRO Residence.<sup>3</sup>

11. Approximately one hour later, at approximately 11:33 a.m., surveillance in the area of the Mendez Residence observed a green Hyundai (the "Courier Vehicle") traveling westbound on Grace Street, which is to the north of both the Chaparro Residence and the Mendez Residence. Then, at approximately 11:34 a.m., law enforcement conducted a traffic stop on the Courier Vehicle in the area of 7400 W. Waveland Avenue, which is to the south of the MENDEZ Residence and is approximately 2½ blocks from the MENDEZ Residence. At the time of the traffic stop, the Courier Vehicle was being driven by an individual later identified as CUEVAS.<sup>4</sup> During the stop, a law enforcement officer observed two rectangular shaped objects in a gift bag located on the vehicle's passenger seat that, based upon the officer's training and experience, appeared to be two kilograms of narcotics.<sup>5</sup>

12. Immediately following the traffic stop, CUEVAS was taken into custody and law enforcement assumed control of the Courier Vehicle and its contents, including the two kilograms of cocaine and a handgun later found in a trap compartment in the vehicle. Law enforcement then began driving the Courier Vehicle around the area of

---

<sup>3</sup> On at least 10 occasions prior to November 30, 2012, surveillance established in the area of the Mendez Residence observed MENDEZ exiting or entering the residence. In addition, according to publicly available property documents, the Mendez Residence is owned by two individuals, including MENDEZ.

<sup>4</sup> See footnote 8.

<sup>5</sup> The two suspected kilograms of narcotics recovered from the Courier Vehicle on or about November 30, 2012, were seized and subsequently submitted to the laboratory for testing, and the results showed that the packages contained approximately 1.987 kilograms of cocaine

the Mendez Residence while determining whether to attempt a controlled delivery of the two kilograms of cocaine to MENDEZ and CHAPARRO at the Mendez Residence.

13. On or about November 30, 2012, between approximately 11:34 a.m. and 11:41 a.m., while driving the Courier Vehicle in the area of the Mendez Residence, law enforcement observed a maroon Toyota Highlander being driven by the Supplier (the "Supplier Vehicle").<sup>6</sup>

14. On or about November 30, 2012, at approximately 11:41 a.m., law enforcement driving the Courier Vehicle in the area of the Mendez Residence observed CHAPARRO, driving the gold Mazda, following the Courier Vehicle. Shortly thereafter, law enforcement turned the Courier Vehicle southbound on Olcott, towards the Mendez Residence. As the law enforcement officer turned onto Olcott, he observed CHAPARRO drive into the mouth of the alley to the east of Olcott, at which point CHAPARRO stopped, honked his horn, and waived his hand, gesturing for the Courier Vehicle to enter the alley. Based upon these gestures, law enforcement believes that CHAPARRO was attempting to direct the Courier Vehicle toward the detached garage of the Mendez Residence. After CHAPARRO gestured toward the Courier Vehicle, law enforcement continued to drive southbound on Olcott, past the Mendez Residence, and then continued driving around the area of the Mendez Residence.

15. Approximately two minutes later, at approximately 11:43 a.m., surveillance established in the area of the Mendez Residence observed MENDEZ

---

<sup>6</sup> The law enforcement officers driving the Courier Vehicle, having previously reviewed a known booking photograph of the Supplier, recognized the driver of the Supplier Vehicle as the Supplier.



standing in the entryway of the detached garage located at the Mendez Residence with the overhead garage door open. At approximately 11:50 a.m., surveillance observed a marked CPD vehicle driving in the area of the Mendez Residence, at which time surveillance also observed MENDEZ close the overhead garage door at the Mendez Residence.

16. On or about November 30, 2012, at approximately 12:10 p.m., law enforcement observed the Supplier driving the Supplier Vehicle southbound on the 3700 block of N. Olcott, and then observed the Supplier double-park the Supplier Vehicle in front of the Mendez Residence. At that point, law enforcement approached the Supplier and detained him. Later, the Supplier was transported to the police station, where he agreed to speak with law enforcement after being advised of and waiving his *Miranda* rights (*see* paragraphs 20-22).

17. Later that day, at approximately 2:27 p.m., law enforcement conducted a traffic stop on CHAPARRO. At that point, CHAPARRO was orally advised of his *Miranda* rights and agreed to waive them, and was then transported by law enforcement to the Mendez Residence, where CHAPARRO spoke with law enforcement. Later, CHAPARRO was transported to the police station, where he provided his telephone number, 773-870-8542 (the "Chaparro Phone"), and the Chaparro Residence as his residence, in response to standard biographical questions.

18. On or about November 30, 2012, at approximately 4:24 p.m., law enforcement obtained consent to search the Mendez Residence. During the course of the subsequent search, law enforcement recovered, among other things, two rectangular-shaped objects suspected of containing two kilograms of heroin, a

handgun, and approximately \$225,000. Field tests later conducted on the rectangular-shaped objects yielded a positive result for the presence of heroin.

19. In addition to the information provided above, according to toll records, on or about November 30, 2012, the Broker Phone was in contact with the Chaparro Phone multiple times. More specifically, on or about November 30, 2012, between approximately 9:58 a.m. and 12:36 p.m., the Broker Phone and the Chaparro Phone were in contact with each other approximately 13 times.

#### Statement And Cooperation Of The Supplier

20. On or about November 30, 2012, after being advised of his/her *Miranda* rights both in writing and orally, and waiving those rights, the Supplier agreed to speak with law enforcement and began cooperating with law enforcement.<sup>7</sup> Among other things, the Supplier told law enforcement that on November 30, 2012, one of his/her nephews (the Broker) contacted him about obtaining some cocaine for an individual later identified by the Supplier as CHAPARRO (*see* paragraph 21, below). According to the Supplier, on that day, CHAPARRO wanted two kilograms of cocaine. According to the Supplier, the Supplier then contacted his narcotics source of supply, who told the Supplier that he could provide the Supplier with two kilograms of cocaine and that the Supplier should “pass by” a particular residence (the “Source House”) to

---

<sup>7</sup> The Supplier has been told that he/she will be charged with a narcotics offense, and has agreed to cooperate with law enforcement in the hopes of receiving a benefit with regard to those anticipated charges. No promises have been made to the Supplier, and the Supplier has not been paid for his/her assistance in this investigation. The Supplier has one prior felony, which involved illegal narcotics. The Supplier has provided law enforcement with reliable information concerning the illegal activities of others, and much of the information provided by the Supplier has been independently corroborated by physical surveillance, telephone records, and pen register data.

obtain the narcotics. The Supplier then told law enforcement that he/she contacted CUEVAS,<sup>8</sup> who had worked with the Supplier in the past to distribute narcotics, and the Supplier told CUEVAS to go to the Source House to pick up two kilograms to take to CHAPARRO. Also, on or about November 30, 2012, the Supplier also provided oral consent to the search of his telephone (the "Supplier Phone"). During the search of the Supplier Phone, law enforcement observed telephone number 773-562-3249, and according to the Supplier, that telephone number was being used by the Broker (the "Broker Phone") (*see* paragraphs 7, 19). In addition, law enforcement observed in the Supplier Phone's telephone call log a series of telephone calls between the Supplier Phone and the Broker Phone that occurred on November 30, 2012.

21. In addition, since November 30, 2012, the Supplier has provided law enforcement with additional information regarding his/her narcotics trafficking activities, as well as the narcotics trafficking activities of others. Among other things, the Supplier identified a known booking photograph of CHAPARRO and told law enforcement that it was CHAPARRO who was to receive the two kilograms of cocaine seized by law enforcement from CUEVAS on or about November 30, 2012. The Supplier told law enforcement that he had previously sold kilograms of cocaine to CHAPARRO, and that he was selling two kilograms of cocaine seized on November 30, 2012, to CHAPARRO for \$36,000 each. According to the Supplier, CHAPARRO placed his order for cocaine through an individual known to the Supplier as "Subrino." Also

---

<sup>8</sup> In addition, during his/her interview with law enforcement, the Supplier reviewed a known booking photograph of CUEVAS and identified the person in the photograph as his/her courier, CUEVAS.

according to the Supplier, Subrino then called the Supplier and asked the Supplier to send CUEVAS. The Supplier would then follow CUEVAS to the Source House to pick up the kilograms of cocaine. According to the Supplier, once CUEVAS picked up the kilograms of cocaine, the Supplier would send CUEVAS to meet with CHAPARRO to deliver the narcotics.

22. In addition, according to the Supplier, sometimes CHAPARRO gave CUEVAS payment or partial payment for the narcotics at the time the narcotics were delivered. Also, the Supplier told law enforcement that he/she sometimes went to CHAPARRO's house to pick up the money from the sale of kilograms of cocaine, and that the Supplier sometimes met CHAPARRO on the street at a pre-determined location so that CHAPARRO could give the Supplier narcotics proceeds.

#### Statement of MENDEZ

23. After being advised of and waiving his *Miranda* rights, MENDEZ agreed to speak with law enforcement. During the subsequent interview, MENDEZ told law enforcement that the money and narcotics recovered from the Mendez Residence belonged to him and his father, CHAPARRO. He also told law enforcement that he purchased the handgun found in his residence from an Insane Spanish Cobra gang member, and that the gun belonged to him. MENDEZ also told law enforcement that he sold drugs for a living and that he and his father have separate customers. According to MENDEZ, his customers buy enough quantities of narcotics that it affords him a comfortable life so that he does not have to work.

24. With respect to the delivery of narcotics, MENDEZ said that when there is a load of kilograms of narcotics to be delivered, he receives a call from his father,

CHAPARRO, who tells him to open the garage door to the Mendez Residence. According to MENDEZ, he understood this direction from his father to mean that he should open the garage door and walk out of the garage to receive a load of narcotics. MENDEZ also said that he had met the Supplier on a number of occasions.<sup>9</sup> According to MENDEZ, the Supplier would open a false compartment in his vehicle and deliver anywhere from 5-10 kilograms of narcotics at a time to MENDEZ. MENDEZ told law enforcement that his father, CHAPARRO, set up each of MENDEZ's previous meetings with narcotics suppliers.

#### Statement of CUEVAS

25. After being advised of and waiving his Miranda rights, CUEVAS agreed to speak with law enforcement. During the subsequent interview, CUEVAS told law enforcement that he had delivered kilograms of cocaine to the garage located at the Mendez Residence on at least eight different occasions and on each occasion he would be directed by the Supplier.<sup>10</sup> According to CUEVAS, on each delivery, he would typically bring 2 kilograms of cocaine.

26. Based upon the above information, there is probable cause to believe that beginning no later than in or about November 2012, JOHNNY CHAPARRO and JOHNNY MENDEZ, also known as "Trigger," did conspire with each other, and with others known and unknown, to knowingly and intentionally possess with intent to

---

<sup>9</sup> During the interview, MENDEZ identified the Supplier as the individual who had stopped the Supplier Vehicle in front of the Mendez Residence earlier that day.

<sup>10</sup> During the interview, CUEVAS was shown a known booking photograph of the Supplier, and CUEVAS identified the Supplier as the person who directed him to deliver narcotics to the Mendez Residence.

distribute and 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 846, and that on or about November 30, 2012, LUCIO CEUVAS, knowingly and intentionally possessed with intent to distribute and 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).

FURTHER AFFIANT SAYETH NOT.

---

JEROME A. DOMICO  
Task Force Officer, Drug Enforcement Administration

SUBSCRIBED AND SWORN to before me on December 12, 2012.

---

JEFFREY COLE  
United States Magistrate Judge