

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TONY J. CAYUELA, a/k/a "Tone
Kapone," and "Kapone,"
JUAN BAUTISTA DOMINGUEZ,
a/k/a "Juanito," and "Diablo,"
JESUS HERNANDEZ,
TONY F. CAYUELA, and
WALBERTO OLIVO

Case No.

Violations:
Title 21, United States Code,
Sections 841(a)(1) and 846

COUNT ONE

The SPECIAL JULY 2018 GRAND JURY charges:

1. Beginning no later than in or about May 2018, and continuing until at least on or about August 21, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere:

TONY J. CAYUELA, a/k/a "Tone Kapone," and "Kapone,"
TONY F. CAYUELA, and
WALBERTO OLIVO,

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, 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

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about May 31, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

TONY J. CAYUELA, a/k/a “Tone Kapone,” and “Kapone,”
JESUS HERNANDEZ, and
TONY F. CAYUELA,

defendants 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 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 THREE

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about August 21, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

TONY J. CAYUELA, a/k/a “Tone Kapone,” and “Kapone,” and
JUAN BAUTISTA DOMINGUEZ, a/k/a “Juanito” and “Diablo,”

defendants 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 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.

FORFEITURE ALLEGATION

The SPECIAL JULY 2018 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) and 846, as set forth in this Indictment, defendant TONY CAYUELA, a/k/a "Tone Kapone," and "Kapone," shall forfeit to the United States, 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 matter and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a).

2. The property to be forfeiture includes, but is not limited to:

a. a personal money judgment in the amount of approximately \$108,000;

b. the real property commonly known as 3740 S. Kedzie Avenue, Chicago, Illinois, and legally described as:

LOT 5 IN BLOCK 5 IN ADAM SMITH'S SUBDIVISION OF LOT 1 IN BLOCK 11, LOT 1 IN BLOCK 12 AND ALL OF BLOCK 17 IN J.H. REE'S SUBDIVISION OF THE WEST HALF OF THE SOUTHWEST QUARTER OF SECTION 36 AND THAT PART OF THE SOUTHEAST QUARTER OF SECTION 35, LYING SOUTH OF THE ILLINOIS AND MICHIGAN CANAL IN TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 16-35-406-020-0000

c. the real property commonly known as 3744 S. Kedzie Avenue, Chicago, Illinois, and legally described as:

LOT 7 IN BLOCK 5 IN ADAM SMITH'S SUBDIVISION OF LOT 1 IN BLOCK 11, LOT 1 IN BLOCK 12 AND ALL OF BLOCK 17 IN J.H. REE'S SUBDIVISION OF WEST 1/2 OF SOUTH WEST 1/4 OF SECTION 36 AND OF THAT PART OF SOUTH EAST 1/4 OF SECTION 35 LYING SOUTH OF ILLINOIS AND MICHIGAN CANAL IN TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 16-35-406-022-0000

d. the real property commonly known as 6228 South Western Avenue, Chicago, Illinois, and legally described as:

LOTS 11 AND 12, IN BLOCK 8, IN COBE AND MCKINNON'S 63RD STREET SUBDIVISION OF THE SOUTHEAST QUARTER OF THE SOUTHEAST QUARTER OF SECTION 13, AND THE NORTHEAST QUARTER OF THE NORTHEAST QUARTER OF SECTION 24, TOWNSHIP 38 NORTH, RANGE 13 EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 19-13-431-025-0000.

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