

FILED
6/14/2021

CM

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JOHNATHAN BURGOS
also known as "Choko"
ALEJANDRO DAVIS, and
DAMIAN REYES
also known as "Trompas"

Violation: Title 18, United States Code,
Sections 922(a)(1)(A) and 922(g)(1)

1:21-CR-00376

JUDGE SEEGER
MAGISTRATE JUDGE MCSHAIN

COUNT ONE

The SPECIAL NOVEMBER 2020 GRAND JURY charges:

From on or about January 20, 2020 until on or about March 24, 2021, at
Chicago, in the Northern District of Illinois, Eastern Division,

JOHNATHAN BURGOS,
also known as "Choko,"

defendant herein, not being a licensed dealer of firearms within the meaning of
Chapter 44, Title 18, United States Code, did willfully engage in the business of
dealing in firearms;

In violation of Title 18, United States Code, Section 922(a)(1)(A).

COUNT TWO

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about January 20, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

JOHNATHAN BURGOS,
also known as "Choko," and
ALEJANDRO DAVIS,

defendants herein, each knowing that he had previously 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 Smith & Wesson Model 13-2 .357 magnum revolver bearing serial number 4D86968, which firearm had traveled in interstate commerce prior to defendants' possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about June 28, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

JOHNATHAN BURGOS,
also known as "Choko,"

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a loaded Ceska Zbrojovka Model 83 semiautomatic pistol bearing serial number A5862, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about July 1, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

JOHNATHAN BURGOS,
also known as "Choko,"

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a loaded Taurus Model PT 145 Pro .45 caliber semiautomatic pistol bearing serial number NE082916, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about November 10, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

JOHNATHAN BURGOS,
also known as "Choko,"

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a loaded Glock Model 26 9-millimeter semiautomatic pistol bearing serial number CNZ304, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIX

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about January 6, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

JOHNATHAN BURGOS,
also known as "Choko,"

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a loaded Glock Model 23 .40 caliber semiautomatic pistol bearing serial number KMM759, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVEN

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about March 2, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

JOHNATHAN BURGOS,
also known as "Choko,"

defendant herein, knowing that he had previously 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 DPMS Model A-15 semiautomatic rifle bearing serial number FFH067171, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT EIGHT

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about March 24, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

JOHNATHAN BURGOS,
also known as "Choko," and
DAMIAN REYES,
also known as "Trompas,"

defendants herein, each knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a Heckler and Koch Model VP9 9-millimeter semiautomatic pistol bearing serial number 224-27661, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2020 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g), as set forth in this Indictment, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, the following:

- a. One Smith & Wesson Model 13-2 .357 magnum bearing serial number 4D86968, and associated ammunition;
- b. One Ceska Zbrojovka Model 83 semiautomatic firearm bearing serial number A5862, and associated ammunition;
- c. One Taurus Model PT 145 Pro .45 caliber semiautomatic firearm bearing serial number NE082916, and associated ammunition;
- d. One Glock Model 26 9-millimeter semiautomatic firearm bearing serial number CNZ304, and associated ammunition;
- e. One Glock Model 23 .40 caliber semiautomatic firearm bearing serial number KMM759, and associated ammunition;
- f. One DPMS Model A-15 semiautomatic rifle bearing serial number FFH067171, and associated ammunition; and

- g. One Heckler and Koch Model VP9 9-millimeter semiautomatic firearm bearing serial number 224-27661, and associated ammunition.

A TRUE BILL:

FOREPERSON

Signed by Timothy J. Storino on behalf of the
UNITED STATES ATTORNEY