

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)
)
 vs.) No. _____
) Violation: Title 21, United States
) Code, Sections 841(a)(1) and 846
 JEREMIAH N. CLEMENT,)
 GEORGE H. BACUS,)
 YOUSIF Y. PIRA, and)
 JUSTIN T. PAGLUSCH)

The JULY 2014 GRAND JURY charges:

1. Beginning at least as early as January 2, 2013 and continuing to January 6, 2015, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

JEREMIAH N. CLEMENT,
GEORGE H. BACUS,
YOUSIF Y. PIRA, and
JUSTIN T. PAGLUSCH,

defendants herein, did conspire with each other and with others known and unknown to the Grand Jury, knowingly and intentionally to manufacture a controlled substance, namely 1,000 or more marijuana plants, a Schedule I Controlled Substance, and to distribute marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. It was the object of the conspiracy for the defendants, JEREMIAH N. CLEMENT, GEORGE H. BACUS, YOUSIF Y. PIRA, and JUSTIN T. PAGLUSCH (hereinafter “the conspirators”), to grow more than 1,000 marijuana plants, process

the plants into pounds of marijuana and to sell marijuana for profit to other individuals.

3. It was a part of the conspiracy that the conspirators would illegally grow and store their supply of marijuana in a warehouse located at 1916 11th Street in Rockford, Illinois that GEORGE H. BACUS initially contracted to purchase on January 2, 2013 and that JEREMIAH N. CLEMENT leased with an option to purchase starting on September 12, 2014 and continuing through January 6, 2015.

4. It was further a part of the conspiracy that the conspirators misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden the purposes of and the acts done in furtherance of the conspiracy described herein, and used surveillance and counter surveillance techniques, and other means to avoid detection and apprehension by law enforcement authorities and otherwise to provide security for members of the conspiracy.

All in violation of Title 21, United States Code, Section 846.

A TRUE BILL:

FOREPERSON