

23CR170
Judge Chang
Magistrate Judge Cummings

FILED

June 7, 2023

JUN 07 2023 Jc

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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

UNITED STATES OF AMERICA

v.

OMARI ANDREWS, JR.

No. **23 CR170**

Violations: Title 21, United States
Code, Section 841(a)(1); Title 18,
United States Code, Section
924(c)(1)(A)

COUNT ONE

The SPECIAL OCTOBER 2022 GRAND JURY charges:

On or about October 18, 2022, at Westmont, in the Northern District of Illinois,
Eastern Division,

OMARI ANDREWS, JR.,

defendant 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).

COUNT TWO

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about November 7, 2022, at Villa Park, in the Northern District of Illinois, Eastern Division,

OMARI ANDREWS, JR.,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance; and 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 THREE

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about February 2, 2022, at Des Plaines, in the Northern District of Illinois, Eastern Division,

OMARI ANDREWS, JR.,

defendant 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).

COUNT FOUR

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about February 13, 2022, at Hillside, in the Northern District of Illinois,
Eastern Division,

OMARI ANDREWS, JR.,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance; a quantity 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).

COUNT FIVE

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about February 22, 2023, at Hillside, in the Northern District of Illinois,
Eastern Division,

OMARI ANDREWS, JR.,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propanamide), a Schedule II Controlled Substance; a quantity 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).

COUNT SIX

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about March 28, 2023, at Mt. Prospect, in the Northern District of Illinois, Eastern Division,

OMARI ANDREWS, JR.,

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 fentanyl (N-phenyl-N- [1- (2-phenylethyl) -4-piperidiny] propanamide), a Schedule II Controlled Substance; a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance; a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I Controlled Substance;

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

COUNT SEVEN

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about March 28, 2023, at Mr. Prospect, in the Northern District of Illinois, Eastern Division,

OMARI ANDREWS, JR.,

defendant herein, did knowingly possess a firearm, namely, (i) a loaded AR-15 A4 rifle, bearing no serial number; (ii) a loaded Glock 19 pistol bearing serial number BGYY185; (iii) a loaded Glock 27 pistol bearing serial number BNTF199; and (iv) a loaded Glock 19X pistol bearing serial number AFBP094, 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 Six of this Indictment;

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

FORFEITURE ALLEGATION

The SPECIAL OCTOBER 2022 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Section 841; or Title 18, United States Code, Section 924(c), as set forth in this Indictment, defendant shall forfeit to the United States of America any property used, and intended to be used, in any manner and part, to commit and to facilitate commission of the offense, as provided in Title 21, United States Code, Section 853; 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:

- a. An AR15 rifle, bearing no serial number, .556 caliber magazine, and assorted ammunition;
- b. A Glock 19 pistol, bearing serial number BGYY185, magazine, and assorted ammunition;
- c. A Glock 27 pistol, bearing serial number BNTF199, magazine, and assorted ammunition;
- d. A Glock 19X pistol, bearing serial number AFBP094, magazine, and assorted ammunition;
- e. Assorted ammunition and magazines; and
- f. Approximately \$9,222 in United States currency seized by law enforcement on or about March 28, 2022.

g. 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

Signed by Erika L. Csicsila on behalf of
MORRIS PASQUAL
ACTING UNITED STATES ATTORNEY