

FILED**7/25/2023**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

REGINALD ALLEN, (a/k/a "Stewey")

CASE NUMBER: 23 CR 408

~~UNDER SEAL~~**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Count One

On or about or about March 25, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, REGINALD ALLEN violated:

*Code Section*Title 21, United States Code, Section
841(a)(1)*Offense Description*

Knowingly and intentionally distributed a controlled substance, namely, 40 grams or more of 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.

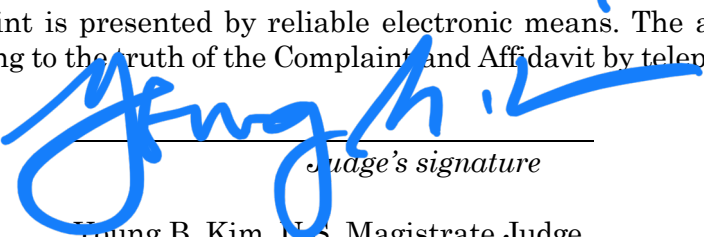
This criminal complaint is based upon these facts:

X Continued on the attached sheet.

MASUD HAIDARI

Task Force Officer, Drug Enforcement
Administration (DEA)by


Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: July 25, 2023
*Judge's signature*City and state: Chicago, IllinoisYoung B. Kim, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, MASUD HAIDARI, being duly sworn, state as follows:

1. I am a Task Force Officer (TFO) with the Drug Enforcement Administration (“DEA”) and have been a Task Force officer since approximately 2018. I am currently assigned to DEA’s Chicago Field Division, High Intensity Drug Trafficking Area (HIDTA). As part of my duties as a DEA Task Force Officer (TFO), I investigate criminal violations of Federal and State controlled substance laws. I have been personally involved in hundreds of narcotics investigations, and as such I am familiar with the various methods used by narcotics traffickers to transport, store and distribute narcotics and narcotics proceeds. I have also received specialized training in the means and methods by which individual and drug trafficking organizations conduct their illegal drug trafficking activities, and in the use of various investigative techniques used to uncover unlawful drug trafficking.

2. This affidavit is submitted in support of a criminal complaint alleging that REGINALD ALLEN has violated Title 21, United States Code, Section 841(a)(1). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging ALLEN with distribution of 40 grams or more of fentanyl on March 25, 2022, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only the facts

that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, my experience and training, information provided to me by other law enforcement agents and the experience and training of those agents, numerous interviews of a confidential source, review of consensual recordings, and physical surveillance.

4. Reference in this affidavit is made to recorded telephone and in-person conversations. In certain instances, these conversations are summarized and placed in context, and my interpretations are sometimes noted in brackets. My understanding of these conversations is aided by the contents and context of the conversations, my familiarity with the facts and circumstances of this investigation, my experience as a law enforcement officer, my discussions with other law enforcement officers, the experience of other law enforcement agents and officers in this investigation, and other evidence developed during the course of the investigation. The recorded conversations herein do not represent finalized transcripts. Only portions of the recorded conversations are contained below.

FACTS IN SUPPORT OF PROBABLE CAUSE

Background

5. Since approximately October 2020, the United States, including the DEA, has conducted an extensive Title-III investigation into the Chicago Gangster Disciples operating on Chicago's southeast side, and in particular, their involvement in narcotics distribution in violation of Title 21, United States Code, Section 841(a)(1)

and 846. During the course of the investigation, confidential sources and undercover officers conducted numerous controlled purchases of narcotics, including heroin, cocaine, and fentanyl, from DTO members. During the course of its investigation, the DEA learned that Reginald ALLEN (also known as “Stewey”) has engaged in the unlawful distribution of narcotics, in violation of Title 21, United States Code, Section 841(a)(1).

6. More specifically, as detailed below, ALLEN sold narcotics to an undercover law enforcement source (“CS-3”)¹ on November 4, 2021; November 11, 2021; November 23, 2021; January 28, 2022; and March 25, 2022. CS-3 coordinated each of these controlled transactions with ALLEN by communicating with ALLEN over ALLEN’s phone—the cellular telephone assigned call number 773-***-5422 (“Subject Phone 8”).² Each of the controlled transactions were audio and video recorded with covert recording devices.

¹ CS-3 has been cooperating with law enforcement since approximately December 2019. CS-3 has 11 prior arrests and no convictions. CS-3 is cooperating with law enforcement for consideration on pending charges in New Orleans, Louisiana, relating to the distribution of heroin. No promises have been to CS-3 regarding the resolution of this matter from New Orleans. Information provided by CS-3 has been corroborated through recorded communications, surveillance, and multiple narcotics seizures. Accordingly, law enforcement believes CS-3 to be a reliable source of information.

² According to telephone records, Subject Phone 8 is subscribed to by “Mike Larry” with service provided by Boost Mobile.

***November 4, 2021, ALLEN Distributes 5.86 Grams
of a Fentanyl and Heroin Mixture to CS-3***

7. On or about November 2, 2021, a confidential law enforcement source (“CS-1”)³ had a recorded phone conversation with Reginald ALLEN, who was using Subject Phone 8.⁴ During the call, CS-1 and ALLEN discussed another confidential law enforcement source (CS-3) who would call ALLEN to purchase narcotics from ALLEN. During this initial setup call, CS-1 stated, “my, my bro ‘T’ [CS-3] gonna be, he gonna be here uh, Thursday man, you know what I’m saying, he wants to spend, he wants to spend like \$300 [to buy narcotics].”⁵ ALLEN responded, “Man you told,

³ As of April 2022, CS-1 had been cooperating with law enforcement since in or around April 2010. CS-1 has three prior felony drug convictions. CS-1 was cooperating with law enforcement for financial compensation. As of April 2022, CS-1 had received reimbursements in the amount of approximately \$25,765 from law enforcement for expenses associated with his/her cooperation in this and other investigations. CS-1 has provided timely and accurate information that has been corroborated by law enforcement through controlled buys, consensual recordings, phone records, and law enforcement reporting.

On or about May 11, 2022, CS-1 participated in a controlled transaction, at direction of law enforcement. Following the May 11, 2022 controlled transaction, law enforcement learned of facts suggesting that CS-1 may not have provided law enforcement with the full quantity of narcotics that CS-1 obtained during the May 11, 2022 transaction. As a result, law enforcement ceased to utilize CS-1 in situations in which CS-1 would be asked to handle narcotics. Notwithstanding the above, law enforcement still believes that the information that CS-1 has provided during the course of this investigation has been reliable.

⁴ ALLEN has been identified as the user of Subject Phone 8 as follows: 1) as described below, after the November 11, 2021 controlled transaction, CS-3 identified a known photograph of ALLEN from a law enforcement database and confirmed that he was the individual with whom CS-3 met during the transactions; 2) the Dodge Charger (described below)—which ALLEN used during the November 4, 2021 controlled transaction—was registered to ALLEN; and 3) Law enforcement has compared the voice of the user of Subject Phone 8 during this transaction and others to ALLEN’s voice recorded with covert audio recording devices during the various narcotics transactions and confirmed that it is the same person.

⁵ Some of the conversations detailed herein have been summarized and excerpted in this affidavit. The summaries of the recorded conversations do not include all statements made or topics covered during the course of the recorded conversations. I based the summaries and

you told me, you told me that last time dude ain't never come ." CS-1 responded, "I'm like man you supposed to came last week he was like man Boo⁶ on everything I'm coming this week bro cause he coming to see me." ALLEN then told CS-1 to have CS-3 call ALLEN: "Aight just give [CS-3], just, just give [CS-3] the number and everything but I was gonna say, you call and get in contact with 'Pine', you call and get in contact with 'Pine' he gonna tell you that it's back good for sure, it's some good ass dope."

8. Later that same day, at approximately 1:56 p.m., CS-3 had a recorded phone conversation with ALLEN, who was using Subject Phone 8. During that call, CS-3 said, "Thursday right cause I'm finna bust a new joint down so I'm, imma get about thirty [units of narcotics] off from you . . . Early about 10 o'clock". ALLEN responded, "Imma be up [awake]."

9. Two days later, on or about November 4, 2021, at approximately 9:56 a.m., CS-3 had a recorded phone conversation with ALLEN, who was using Subject Phone 8. During their call, CS-3 said, "imma grab like 30 [units of narcotics] on from

the language quoted from the recorded conversations on draft transcripts prepared by myself and other law enforcement officers involved in this investigation. At various points in the Affidavit, I also have indicated (sometimes in brackets) my interpretation of words and phrases used in the recorded conversations. My summaries and interpretations also are based on the context of the recorded conversations, events occurring before or after the recorded conversations, information received from confidential sources, my knowledge of the investigation as a whole, my training and experience, and the training and experience of other law enforcement officers involved in this investigation.

⁶ Based on my knowledge of the investigation, I know that "Boo" is the nickname used by Ernest Rowlette, another member of the Chicago Gangster Disciples who distributed narcotics for the DTO.

you,” to which ALLEN responded, “Just come to, just come to [CS-1] crib, I’ll meet you at [CS-1] crib.”

10. Prior to meeting with ALLEN, CS-3 met with law enforcement and law enforcement searched CS-3 for contraband and excess currency, with none found. Law enforcement equipped CS-3 with covert audio and video recording equipment and provided to CS-3 \$300 in pre-recorded law enforcement funds to use for the controlled transaction.

11. At approximately 10:38 a.m. and 10:41 a.m., CS-3 had recorded phone conversations with ALLEN, who was using Subject Phone 8, and they agreed upon a meet location in the vicinity of 205 West 105th Place in Chicago.

12. According to CS-3, law enforcement surveillance, and audio and video recordings of the transaction, at approximately 10:41 a.m., ALLEN arrived at the meet location driving a Dodge Charger with Illinois registration no. CA98331 (the “Dodge Charger”) and parked. CS-3 then got into the front passenger-side of the Dodge Charger. Inside the Charger, ALLEN distributed to CS-3 40 clear plastic baggies that contained a white powdery substance in exchange for \$300. CS-3 then departed and reunited with law enforcement, who took custody of the baggies. According to DEA lab reports, the contents of the baggies tested positive for a mixture of fentanyl and heroin, and weighed approximately 5.86 grams.

13. At approximately 10:46 a.m., CS-3 had a recorded phone conversation with ALLEN, who was using Subject Phone 8. During their call, ALLEN asked, “You be, you be blowing or you be selling,” to which CS-3 replied, “No I be double jugglin

jack. See I got, I got, I got a joint I double juggle on then I got my own joint.” ALLEN then stated, “Alright bet. I’m sure I just wanna know so I can know how to handle business with you, you feel me? Cause I don’t want, I don’t want you to feel uncomfortable at all I don’t wanna feel uncomfortable either.” CS-3 replied, “Alright we gonna, we gonna rock then baby” and ALLEN then responded, “Alright it’s gonna be good.”

14. Based on my training, experience, and my knowledge of this investigation, I believe that during this conversation, ALLEN was asking CS-3 whether CS-3 was a user or a seller of narcotics, because ALLEN intended to continue selling narcotics to CS-3.

15. After the November 4, 2021 controlled narcotics transaction, law enforcement showed a known photograph of ALLEN to CS-3 and CS-3 identified ALLEN as the individual in the Dodge Charger from whom CS-3 had just bought narcotics.

***November 11, 2021, ALLEN Distributes 12.2 Grams
of a Fentanyl and Heroin Mixture to CS-3***

16. On or about November 10, 2021, at approximately 10:28 a.m., CS-3 had a recorded phone conversation with ALLEN, who was using Subject Phone 8, during which CS-3 and ALLEN discussed the November 4, 2021 narcotics transaction as well as a future narcotics transaction. More specifically, CS-3 stated, “Hey, lemme ask

you...yeah. Lemme ask you a question. Was them nicks⁷ you gave me last time?” ALLEN responded, “yeah them was nicks.” CS-3 state, “you shorted me then.” ALLEN responded, “I ain’t short you...that’s why you got 40 bags. You asked for 30 bags I gave you 40 bags. It was 20 in each jab⁸ ... but you can sell them for double up you feel me . . . You can sell them for ten.”

17. The next day, November 11, 2021, at approximately 10:23 a.m., CS-3 had a recorded phone conversation with ALLEN, who was using Subject Phone 8, during which they discussed CS-3 purchasing narcotics from ALLEN that day. At approximately the same time, CS-3 also exchanged text messages with ALLEN on Subject Phone 8 and agreed to meet with ALLEN at the same location that they had previously met on November 4, 2021—approximately 345 West 105th Place in Chicago.

18. Prior to meeting with ALLEN, CS-3 met with law enforcement and law enforcement searched CS-3 for contraband and excess currency, with none found. Law enforcement equipped CS-3 with covert audio and video recording equipment and provided to CS-3 \$500 in pre-recorded law enforcement funds to use for the controlled transaction. CS-3 then departed for the meet location.

19. At approximately 10:45 a.m., CS-3 arrived at the meet location and had a recorded phone conversation with ALLEN, who was using Subject Phone 8. During

⁷ Based on my training and experience, I know that a “nick” refers to a small amount of narcotics. More specifically, “Nicks” is short for “nickel” and refers to the fact that a “nick” is typically sold for \$5 per baggie.

⁸ Based on my training and experience, I know that the term “jab” refers to approximately 12 individual quantities of narcotics.

their call, ALLEN asked, "Alright what you trying to do? What you did last time?" CS-3 responded, "No I want 50 [units of narcotics] ... I got \$500 what you gonna do for that [how much narcotics does \$500 buy]?" ALLEN said, "Aight I'm finna get you together." Approximately 6 minutes later, CS-3 received a call from ALLEN, who was using Subject Phone 8. During their conversation, ALLEN stated, "I'm finna come out the crib now. I'm putting the rubber bands on your jabs."

20. According to CS-3, law enforcement surveillance, and audio and video recording, approximately three minutes later, ALLEN exited the residence located at 340 W. 105th Place and got into the passenger side of CS-3's car. Inside the car, ALLEN distributed to CS-3 74 clear plastic baggies that contained a white powdery substance in exchange for \$500. ALLEN then exited CS-3's vehicle, at which time CS-3 departed the area and reunited with law enforcement who took custody of the baggies. According to DEA lab reports, the contents of the bags tested positive for a mixture of fentanyl and heroin and weighed approximately 12.2 grams.

***November 23, 2021, REGINALD ALLEN Distributes 8.9 Grams
of a Fentanyl and Heroin Mixture to CS-3***

21. On or about November 18, 2021, at approximately 11:13 a.m., CS-3 had a recorded phone conversation with ALLEN, who was using Subject Phone 8, during which CS-3 asked to purchase narcotics from ALLEN. More specifically, CS-3 stated, "Hey Imma come slide on you probably Monday or Tuesday when I get back to town ... Imma grab like 10 of them to, 10 grams [of narcotics], you give me a number on those." ALLEN replied, "You said, you said 10 grams?" CS-3 responded, "Yea, just give me a number on those." ALLEN replied, "Yea, give me, just give me [\$]80 a

gram.” CS-3 said, “Ok, ok, ok cool, Imma fuck with you when I get back, but Imma give you a heads up as soon as I touch back down.”

22. Approximately four days later, on November 22, 2021, at approximately 3:24 p.m., CS-3 had a recorded phone conversation with ALLEN, who was using Subject Phone 8. During their conversation, CS-3 said “Hey what up ... I’m back Imma get at you tomorrow ... Imma get 10 of those grams [of narcotics] from you.” ALLEN responded, “Aight.”

23. The next day, on November 23, 2021, at approximately 11:23 a.m., CS-3 had a recorded phone conversation with ALLEN, who was using Subject Phone 8. During the conversation, CS-3 stated, “Hey, I’m still coming your way about 1, 1:30.” ALLEN replied, “I’m trying to make sure Imma have it [narcotics] ready for you bro because I got stuff I got to do too, I was gonna dip out and have my little cousin hit everybody, so if you and me need to do business because I know you don’t like new people and shit bro, make sure you be out here by 1:30.” CS-3 then prepared to meet with ALLEN at a meet location in the same vicinity as the meet location from the previous controlled transactions on November 4 and 11, 2021.

24. Prior to meeting with ALLEN, CS-3 met with law enforcement and law enforcement searched CS-3 for contraband and excess currency, with none found. Law enforcement equipped CS-3 with covert audio and video recording equipment and provided to CS-3 \$800 in pre-recorded law enforcement funds to use for the controlled transaction. CS-3 then departed for the meet location.

25. At approximately 1:57 p.m. and 2:09 p.m., ALLEN had recorded conversations with ALLEN, who was using Subject Phone 8, in which the two coordinated their meeting.

26. According to CS-3, law enforcement surveillance, and audio and video recordings of the transaction, CS-3 arrived at the meet location, 344 W. 105th Place, at approximately 2:10 p.m. A few minutes later, ALLEN exited the basement door of the residence and entered the passenger seat of CS-3's car. Inside the car, ALLEN distributed to CS-3 a clear plastic baggie that contained a tan powdery substance. In return, CS-3 gave to ALLEN \$800 in pre-recorded law enforcement funds. A still image of ALLEN from CS-3's covert video recording device appears below:



27. CS-3 then departed the meet location and reunited with law enforcement who took custody of the baggie. According to DEA lab reports, the

substance in the baggie tested positive for a mixture of fentanyl and heroin and weighed approximately 8.9 grams.

***January 28, 2022, REGINALD ALLEN Distribute 24.3 Grams
of a Fentanyl and Heroin Mixture to CS-3***

28. On or about January 26, 2022, at approximately 12:43 p.m., CS-3 had a recorded phone conversation with ALLEN, who was using Subject Phone 8. During their conversation, CS-3 asked to purchase narcotics, stating, “Hey hey, can I slide on you Friday morning grab me a quarter [25 grams of narcotics]?” ALLEN replied, “You want 25 grams?” CS-3 responded, “Yea ... uhh, you’ll let me get ‘em at \$75 [per gram]?” ALLEN said, “Yea. Friday, what time? ... Aight I’ll give it to you, maaan, \$75, yea I’ll take \$75 for it.”

29. Two days later, on January 28, 2022, at approximately 9:30 a.m., CS-3 had a recorded phone conversation with ALLEN, who was using Subject Phone 8. During the call, ALLEN and CS-3 agreed to meet at a location in the same vicinity where CS-3 and ALLEN had conducted their previous narcotics transactions.

30. Prior to meeting with ALLEN, CS-3 met with law enforcement and law enforcement searched CS-3 for contraband and excess currency, with none found. Law enforcement equipped CS-3 with covert audio and video recording equipment and provided to CS-3 \$1,875 in pre-recorded law enforcement funds to use for the controlled narcotics transaction with ALLEN. CS-3 then departed for the meet location.

31. According to CS-3, law enforcement surveillance, and audio and video recording of the transaction, at approximately 9:57 a.m., ALLEN arrived in the

vicinity of the meet location at approximately 341 W. 105th Place in Chicago. ALLEN was sitting in the back seat of a white Chevy SUV which appeared to be an Uber. The Uber departed and ALLEN remained in the area. At approximately 10:06 a.m., CS-3 received a call from Allen, who was from Subject Phone 8, and during the recorded call, CS-3 told ALLEN that CS-3 was about 20 minutes away from the meet location.

32. At approximately 10:47 a.m., CS-3 arrived at the meet location and parked CS-3's vehicle. CS-3 called ALLEN and ALLEN confirmed that he was coming out of the house. ALLEN exited the residence located at approximately 340 W. 105th Place and entered the passenger seat of CS-3's vehicle. Inside the car, ALLEN distributed to CS-3 a clear plastic bag that contained a tan chunky substance in exchange for \$1,875. A still image of ALLEN giving the baggie to CS-3 from CS-3's covert video recording device appears below:



33. CS-3 then departed the meet location and reunited with law enforcement who took custody of the baggies. According to DEA lab reports, the

substance in the baggies tested positive for a mixture of fentanyl, fentanyl analog, and heroin, and weighed approximately 24.3 grams.

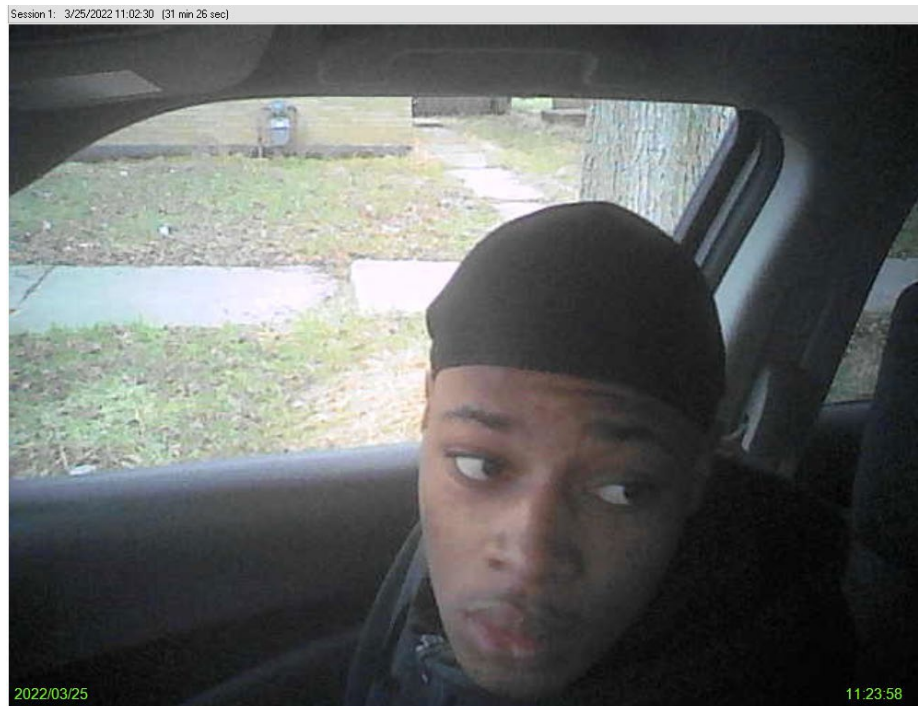
***March 25, 2022, REGINALD ALLEN Distributes 49.5 Grams
of Fentanyl to CS-3***

34. On or about March 23, 2022, at approximately 2:16 p.m., CS-3 sent a text to ALLEN at Subject Phone 8 that read, “If I grab fatty wap [narcotics] can you do the 75 [\$75 per gram of narcotics?]” ALLEN, who was using Subject Phone 8, texted back, “You want both or just the fatty[?]” At approximately 2:20 p.m., CS-3 had a recorded phone conversation with ALLEN, who was using Subject Phone 8, and stated “I just need the fatty shit, cuz the fatty will do what I need it to do.” ALLEN responded, “Yea 75, I’ll see what they say if you grab 50 but they want 80 [explaining that ALLEN’s drug supplier wanted to sell the narcotics for \$80 per gram].” CS-3 replied, “Right right right, ok well let me know what I got to do to get it at the seventy cuz I definitely want it.” ALLEN later said, “I can...yea, I’ll do it for the 75 [\$75 per gram of narcotics] G.”

35. Two days later, on or about March 25, 2022, at approximately 11:15 a.m., CS-3 sent a text message to ALLEN at Subject Phone 8, confirming that CS-3 would arrive to the meet location in approximately 10 minutes.

36. Prior to meeting with ALLEN, CS-3 met with law enforcement and law enforcement searched CS-3 for contraband and excess currency, with none found. Law enforcement equipped CS-3 with covert audio and video recording equipment and provided to CS-3 \$3,750 in law enforcement funds to use for the controlled narcotics transaction.

37. According to CS-3, law enforcement surveillance, and audio and video recording of the interaction, at approximately 11:21 a.m., CS-3 arrived at the same meet location, at approximately 344 W. 105th Place, and had a conversation with ALLEN, who was using Subject Phone 8. During the conversation, CS-3 stated, “Hey I’m here lil’ homie.” ALLEN replied, “Alright I’m finna come.” ALLEN then exited the basement door of the residence at 344 W. 105th Place and got into CS-3’s car. Inside the vehicle, ALLEN distributed to CS-3 a plastic baggie that contained a powdery substance. In return, CS-3 gave to ALLEN \$3,750 in pre-recorded law enforcement funds. A still image of ALLEN from CS-3’s covert video recording device appears below:



38. CS-3 then departed the meet location and reunited with law enforcement who took custody of the baggies. According to DEA lab reports, the

substance in the baggies tested positive for fentanyl and weighed approximately 49.5 grams.

CONCLUSION

39. Based on the foregoing, I submit that there is probable cause to believe that on March 25, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, REGINALD ALLEN distributed 40 grams or more of fentanyl, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER AFFIANT SAYETH NOT.

Masud Haidari

MASUD HAIDARI

Task Force Officer, Drug Enforcement
Administration

by
YBK

SWORN TO AND AFFIRMED by telephone on July 25, 2023.

Young B. Kim

Honorable Young B. Kim
United States Magistrate Judge