

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JYMIL CAMPBELL

CASE NUMBER:
UNDER SEAL

CRIMINAL COMPLAINT

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

From on or about March 1, 2016 to on or about May 3, 2016, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

Title 18, United States Code, Section
922(a)(1)(A)

Offense Description

willfully engaging in the business of dealing in
firearms while not a licensed importer,
manufacturer, or dealer

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

JAMES ELLIOTT

Special Agent, Bureau of Alcohol, Tobacco,
Firearms & Explosives (ATF)

Sworn to before me and signed in my presence.

Date: August 25, 2016

Judge's signature

City and state: Chicago, Illinois

Mary M. Rowland, U.S. Magistrate Judge
Printed name and Title

AFFIDAVIT

I, JAMES ELLIOTT, being duly sworn, state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives. I have been so employed for approximately three years. During this time, I have conducted and/or participated in several investigations involving violations of Title 18, United States Code, specifically, the illegal possession and trafficking of firearms by prohibited persons.

2. I graduated from the Federal Law Enforcement Training Center and the ATF National Academy and have specialized training and experience in various types of investigative activities, including, but not limited to, the following: (a) physical surveillance; (b) the debriefing of defendants, witnesses, informants and other individuals who have knowledge concerning violations of federal firearms laws; (c) undercover operations; (d) the execution of search warrants; (e) the consensual monitoring and recording of conversations; and (g) the handling and maintenance of evidence.

3. This affidavit is submitted in support of a criminal complaint alleging that JYMIL CAMPBELL has violated Title 18, United States Code, Section 922(a)(1)(A). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging CAMPBELL with willfully engaging in the business of dealing in firearms while not

a licensed importer, manufacturer, or dealer, I have not included each and every fact known to me concerning this investigation. 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.

4. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts.

5. At various points in this affidavit, I will summarize certain recorded conversations and meetings, and provide law enforcement's interpretation of them in brackets and otherwise. These interpretations of these conversations are based on my knowledge of the investigation to date, including the contents and context of the meetings, prior and subsequent conversations, the results of physical surveillance, and conversations with other officers and agents. Any quotations of conversations are not based upon final transcriptions of the recorded conversations, and do not include references to all the topics covered during the course of the conversations or to all statements made by the speakers on the topics that are mentioned. The exact wording of the quotations may differ once transcriptions are finalized, and all voice identifications are preliminary.

Summary of the Investigation

1. As set forth below, at the direction of law enforcement, two confidential informants ("CI-1" and "CI-2") conducted approximately three controlled purchases

of firearms from CAMPBELL, all of which were video and audio recorded. In total, they purchased approximately three firearms from CAMPBELL.

Source Information on JYMIL CAMPBELL

2. In approximately January 2016, CI-1¹ and CI-2² informed law enforcement about a convicted felon named “Jymil” who was selling firearms. According to CI-1 and CI-2, “Jymil” stated that he had a firearms supplier in Indiana and could acquire any firearms the CIs needed.

3. According to CI-1 and CI-2, “Jymil”’s phone number was (773) 902-8795. According to CI-1, “Jymil” lived at 2156 S. Millard, Chicago, Illinois, and drove a car with license plate number V82 8541.

4. After acquiring this information, law enforcement searched for a “Jymil” with that phone number in Accurint, a law enforcement database that aggregates biographical and contact information from public records. The search revealed that JYMIL CAMPBELL was listed as residing at multiple addresses, including the **Subject Premises**. The search also revealed that telephone number (773) 902-8795 was listed as associated with CAMPBELL.

¹ CI-1 has been cooperating with law enforcement for approximately six years and has provided information in approximately 12 cases. Of the cases in which CI-1 has provided information, approximately five arrests were made, leading to approximately two convictions and several pending cases. CI-1 has been paid approximately \$24,677 for CI-1’s cooperation. CI-1 has approximately three prior convictions for narcotics offenses and violent crimes.

² CI-2 has been cooperating with law enforcement since approximately early 2016 and has provided information in one case that did not result in an arrest. CI-2 has been paid approximately \$200 for CI-2’s cooperation. CI-2 has approximately two prior convictions for firearms offenses and violent crimes.

5. Law enforcement also searched for CAMPBELL in NCIC, which is a law enforcement database that aggregates, among other things, arrest and conviction records for individuals. The search revealed that CAMPBELL was convicted of armed robbery and home invasion, both Class X felonies in Illinois, in approximately April 2005.

Controlled Purchases of Firearms from CAMPBELL

March 1, 2016 Purchase

6. On or about February 29, 2016, CAMPBELL, using (773) 902-8795 (“Campbell Phone 1”), texted CI-1 a photograph of a semi-automatic pistol with an extended magazine, which CI-1 then forwarded to law enforcement. According to CI-1, CI-1 then had an unrecorded call with CAMPBELL in which CAMPBELL told CI-1 that he would be willing to sell CI-1 the pictured firearm for \$800. They agreed to meet at the **Subject Premises** the following day.

7. At law enforcement’s direction, CI-1 met with CAMPBELL to purchase the firearm on or about March 1, 2016. That day, CI-1 met with law enforcement. Law enforcement searched CI-1 and CI-1 car for illegal contraband and found none. Law enforcement also equipped CI-1 with audio-video recording equipment that could only be turned off by law enforcement, and provided CI-1 with \$800 in U.S. currency with which to purchase the firearm.

8. At approximately 2:08 PM that day, law enforcement followed CI-1 to the 2100 block of S. Millard Ave, and observed CI-1 park, walk up to the **Subject**

Premises, and knock. CAMPBELL³ then opened the door and let CI-1 into the **Subject Premises**. At approximately 2:15 PM, law enforcement surveilled CI-1 leave the **Subject Premises** and enter CI-1's vehicle, whereupon law enforcement followed CI-1 as CI-1 drove to a predetermined debriefing location. CI-1 did not stop along the way. At the debriefing location, law enforcement searched CI-1's person and car, and found a Ruger 9mm semi-automatic pistol with two ammunition magazines, one of which was an extended-capacity magazine. Law enforcement did not find any other contraband.

9. Law enforcement has reviewed the surreptitiously recorded video of this transaction, in which CAMPBELL is occasionally visible. After CAMPBELL let CI-1 into the **Subject Premises**, a sound of a heavy item being placed on a table can be heard, and CAMPBELL said words to the effect of, "I'll have another one later today." Later, CAMPBELL said words to the effect of, "This is what I'm going to do. When you come here, I'm going to send you a picture of the [unintelligible] Glock, I'm going to send you a picture of the big joint [a long rifle]. You tell him I want 1200 [dollars]." When asked about the "big joint," CAMPBELL said, "Yeah, I have it back there," and gestured toward the back. Campbell walked away and then returned. A long and thin gun barrel was then briefly visible. CAMPBELL then pointed out various parts of the gun, such as the clip, and said that it shoots .22 rounds. [Based on this video and conversation, it appears that CAMPBELL brought out a long gun that CS-1 then handled.]

³ Law enforcement recognized CAMPBELL from a known booking photo of CAMPBELL.

March 2, 2016 Purchase

10. On or about March 1, 2016, CAMPBELL, using Campbell Phone 1, had an unrecorded telephone conversation with CI-1 regarding a Walther .22 pistol. According to CI-1, CAMPBELL agreed to sell CI-1 the pistol for \$700 the following day. CAMPBELL also told CI-1 that he had sold the long rifle that CAMPBELL and CI-1 handled earlier that day.

11. At law enforcement's direction, CI-1 met with CAMPBELL to purchase the firearm on or about March 2, 2016. That day, CI-1 met with law enforcement. Law enforcement searched CI-1 and CI-1's car for illegal contraband and found none. Law enforcement also equipped CI-1 with audio-video recording equipment that could only be turned off by law enforcement, and provided CI-1 with \$700 in U.S. currency with which to purchase the firearm.

12. At approximately 1:00 PM that day, law enforcement followed CI-1 to the 2100 block of S. Millard Ave and observed CI-1 park, walk up to the **Subject Premises**, and knock. CAMPBELL then opened the door and let CI-1 into the **Subject Premises**. At approximately 1:07 PM, law enforcement surveilled CI-1 leave the **Subject Premises** and enter CI-1's vehicle, whereupon law enforcement followed CI-1 as CI-1 drove to a predetermined debriefing location. CI-1 did not stop along the way. At the debriefing location, law enforcement searched CI-1's person and car, and found a box containing a Walther .22 pistol with two magazines and ammunition. Law enforcement did not find any other contraband.

13. Law enforcement has reviewed the surreptitiously recorded video of this transaction, in which CAMPBELL is occasionally visible. After CAMPBELL let CI-1 into the **Subject Premises**, they discussed a firearm. CI-1 said words to the effect of, “That is nice. That’s light. No bullets though.” CI-1 then asked CAMPBELL, “What happened to those other ones yesterday? Them nice ones you showed me.” CAMPBELL stated that his gun supplier’s brother had taken the guns to “the land” [the neighborhood in which the brother sells drugs] in order to “handle some business” there.

May 3, 2016 Purchase

14. On or about May 1, 2016, CAMPBELL, using Campbell Phone 1, texted CI-1 a photograph of a firearm for sale, which CI-1 forwarded to law enforcement. CAMPBELL and CI-1 then had an unrecorded telephone call in which CAMPBELL arranged to sell the firearm to CI-1.

15. At law enforcement’s direction, CI-1 met with CAMPBELL to purchase the firearm on or about May 3, 2016. That day, CI-1 met with law enforcement. Law enforcement searched CI-1 and CI-1’s car for illegal contraband and found none. Law enforcement also equipped CI-1 with audio-video recording equipment that could only be turned off by law enforcement, and provided CI-1 with \$800 in U.S. currency with which to purchase the firearm.

16. At approximately 10:48 AM that day, law enforcement followed CI-1 to the 2100 block of S. Millard Ave and observed CI-1 park, walk up to the **Subject Premises**, and knock. CAMPBELL then opened the door and let CI-1 into the

Subject Premises. At approximately 10:55 AM, law enforcement surveilled CI-1 leave the **Subject Premises** and enter CI-1's vehicle, whereupon law enforcement followed CI-1 as CI-1 drove to a predetermined debriefing location. CI-1 did not stop along the way. At the debriefing location, law enforcement searched CI-1's person and car, and found a Smith & Wesson 9mm semi-automatic pistol with one magazine and ammunition. Law enforcement did not find any other contraband.

17. Law enforcement has reviewed the surreptitiously recorded video of this transaction, in which CAMPBELL is occasionally visible. After CAMPBELL let CI-1 into the **Subject Premises**, they discussed a firearm. CI-1 said words to the effect of, "That's what I'm talking about. This is good quality. See, I like this for myself, man. Lightweight, not too big. How many shots?" CAMPBELL responded, "12." CI-1 replied, "Nice. This is what I'm telling my guys to get like this, for security."

FURTHER AFFIANT SAYETH NOT.

JAMES ELLIOTT
Special Agent, Bureau of Alcohol, Tobacco,
Firearms & Explosives

SUBSCRIBED AND SWORN to before me on August 25, 2016.

Mary M. Rowland
United States Magistrate Judge