

FILED
10/8/2024

AXK

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

PATRICK TUCKER, also known as “Packy”;
THOMAS CUNNINGHAM, also known as
“Tom Tom”;
DARIUS JOHNSON, also known as “Dee,” “D,”
and “DeeDee”;
KYWANTE SHUMAKE, also known as “Tae”;
KEONTIS SHUMAKE, also known as “Lil
Cuz”;
KAMARI ROSS, also known as “Mari”;
DREQUAN BASS, also known as “Dre” and
“Lil Dre”; and
LACOLA WILLIAMS, also known as “Duwop”
and “Doodie”

1:24-cr-00471

Judge Jeremy C. Daniel

Magistrate Judge Jeffrey T. Gilbert

RANDOM / Cat. 2

Case No.

Violations: Title 21, United
States Code, Sections
841(a)(1) and 846; Title 18
United States Code, Section
924(c)(1)(A)

INDICTMENT

UNDER SEAL

COUNT ONE

The SPECIAL MAY 2024 GRAND JURY charges:

1. Beginning no later than on or about March 23, 2023, and continuing
until on or about July 25, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

PATRICK TUCKER, also known as “Packy”;
THOMAS CUNNINGHAM, also known as “Tom Tom”;
DARIUS JOHNSON, also known as “Dee,” “D,” and “DeeDee”;
KYWANTE SHUMAKE, also known as “Tae”;
KEONTIS SHUMAKE, also known as “Lil Cuz”;
KAMARI ROSS, also known as “Mari”;
DREQUAN BASS, also known as “Dre” and “Lil Dre”; and
LACOLA WILLIAMS, also known as “Duwop” and “Doodie”

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and 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-piperindinyl] propanamide), a Schedule II Controlled Substance and a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846; and

2. With respect to PATRICK TUCKER and THOMAS CUNNINGHAM, the offense involved 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance.

COUNT TWO

The SPECIAL MAY 2024 GRAND JURY further charges:

From on or about June 22, 2023, and continuing until on or about May 29, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

PATRICK TUCKER, also known as “Packy”;
THOMAS CUNNINGHAM, also known as “Tom Tom”;
DARIUS JOHNSON, also known as “Dee,” “D,” and “DeeDee”;
KYWANTE SHUMAKE, also known as “Tae”;
KEONTIS SHUMAKE, also known as “Lil Cuz”;
KAMARI ROSS, also known as “Mari”;
DREQUAN BASS, also known as “Dre” and “Lil Dre”; and
LACOLA WILLIAMS, also known as “Duwop” and “Doodie”

defendants herein, did knowingly possess a firearm in furtherance of a drug trafficking crime for which each defendant may be prosecuted in a court of the United States, namely, conspiracy to possess with intent to distribute and distribute a controlled substance, in violation of Title 21, United States Code, Section 846, as charged in Count One of this Indictment;

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

COUNT THREE

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about April 2, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

THOMAS CUNNINGHAM, also known as “Tom Tom”;
defendant herein, did knowingly and intentionally possess with intent to 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-piperindinyl] propanamide), a Schedule II Controlled Substance;

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

COUNT FOUR

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about May 29, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DARIUS JOHNSON, also known as “Dee,” “D,” and “DeeDee”;
defendant herein, did knowingly and intentionally possess with intent to 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-piperindinyl] propanamide), a Schedule II Controlled Substance;

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

FORFEITURE ALLEGATION

The SPECIAL MAY 2024 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846 as set forth in this Indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a).
2. The property to be forfeited includes, but is not limited to:
 - a. a Taurus .38 caliber revolver bearing serial number ACB546237, and associated ammunition.
 - b. a Stag Arms .223 caliber pistol bearing serial number S084928, and associated ammunition.
 - c. a Masterpiece Arms 5.7x28mm automatic pistol bearing serial number FX03045, and associated ammunition.
 - d. a Zastava Arms 5.56x45mm pistol bearing serial number Z85-009159, and associated ammunition.
 - e. a Glock 19 9mm pistol bearing serial number AFKF924, and associated ammunition.
 - f. a Glock 26 9mm pistol bearing serial number AFSE733, and associated ammunition.

g. a Paraordnance .45 caliber ACP pistol bearing serial number P113835, and associated ammunition.

h. a Springfield XD-9 9mm pistol with a defaced serial number, and associated ammunition.

i. a Masterpiece Arms 9mm pistol bearing serial number FX22259, and associated ammunition.

j. a KelTec P32 .32 caliber automatic pistol bearing serial number CTM15, and associated ammunition.

k. a Puma 1911 .22 caliber pistol with a defaced serial number, and associated ammunition.

l. \$3,126 in United States Currency;

m. The property located at 2057 W. 69th Place in Chicago, Illinois.

3. 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

ACTING UNITED STATES ATTORNEY