

FILED
1/6/2025**TD****THOMAS G. BRUTON**
CLERK, U.S. DISTRICT COURT**UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

CASE NUMBER: 1:25-cr-00003

v.

UNDER SEAL

JAUAN BROWN

also known as "Juan"

CRIMINAL COMPLAINT

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

On or about May 13, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant violated:

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

knowingly possessing with the intent to distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide)

This criminal complaint is based upon these facts:

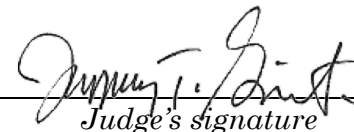
X Continued on the attached sheet.

Chung S. Kim

CHUNG S. KIM

Special Agent, Homeland Security Investigations
(HSI)

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: January 6, 2025
Judge's signatureCity and state: Chicago, IllinoisJEFFREY T. GILBERT, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, CHUNG S. KIM, being duly sworn, state as follows:

1. I am a Special Agent with the Department of Homeland Security – Immigration and Customs Enforcement – Homeland Security Investigations (“HSI”) and have been so employed since 2019. I am currently assigned to HSI’s Gangs and Violent Crimes Task Force and, as part of my duties as an HSI Special Agent, I investigate criminal violations relating to narcotics offenses, including Title 21, United States Code, Section 841.

2. This affidavit is submitted in support of a criminal complaint alleging that JAUAN BROWN, also known as “Juan,” 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 BROWN with possession with intent to distribute heroin and fentanyl, 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.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents and in law enforcement records, review of body worn camera footage, surveillance video, and photographs, review of

laboratory analysis, review of public records databases, and my training and experience, as well as the training and experience of other law enforcement agents.

I. INVESTIGATION BACKGROUND

4. Since approximately April 2023, law enforcement, including HSI and the Chicago Police Department (“CPD”), has been investigating a faction of the Traveling Vice Lords street gang (the “drug trafficking organization” or “DTO”) involved in the operation of an open-air drug market on the corner of West Chicago Avenue and North St. Louis Avenue (the “Chicago and St. Louis drug spot” or “the drug spot”). Through physical surveillance, court-authorized wire intercepts, controlled purchases, trash pulls, and other investigative means, the investigation determined that the DTO maintains stash houses to facilitate its operation, namely through the storage, preparation, and packaging of narcotics for resale at the Chicago and St. Louis drug spot.

5. As of May 13, 2024, law enforcement had identified a suspected DTO stash house at 1066 West 14th Place (the “14th Place Residence”),¹ where law enforcement observed BROWN and others engaged in activity consistent with narcotics trafficking. For example, on March 20, 2024, according to CPD reporting, law enforcement officers (“LEOs”) monitoring electronic surveillance observed BROWN exit the 14th Place Residence carrying a large, plastic garbage bag, which he placed in his vehicle. He briefly reentered the 14th Place Residence and exited

¹ In prior affidavits related to this investigation, this stash house was identified as 1066 West 14th Street and referred to as the “14th Street Residence.” The correct address is on 14th *Place*, not 14th Street.

with two more large, plastic garbage bags, both of which he placed in his vehicle. BROWN reentered the 14th Place Residence and emerged carrying several more large, plastic garbage bags, which he placed in a trash receptacle near the 14th Place Residence.

6. Shortly thereafter, according to CPD reporting, undercover LEOs retrieved four large, plastic garbage bags from the trash receptacle near the 14th Place Residence. Other LEOs, continuing to surveil BROWN, followed his vehicle to an alleyway on the 4400 block of West Adams Street, where BROWN opened his trunk and discarded three large, plastic garbage bags in a nearby garbage container. After BROWN left the area, LEOs also recovered these bags.

7. Upon searching the seven bags discarded by BROWN, LEOs recovered items consistent with the manufacturing and packaging of narcotics, including boxes of empty Dormin pill bottles,² blue face masks, gloves, narcotics packaging material used to seal kilogram quantities of drugs, an empty lactose powder container, and various empty bottles of other suspected cutting agents. Additionally, the residue in the garbage field-tested presumptively positive for the presence of heroin.

II. MAY 13, 2024, SEIZURE OF 190 GRAMS OF HEROIN AND FENTANYL FROM BROWN'S VEHICLE

8. According to CPD reporting, on May 13, 2024, at approximately 8:00 a.m., LEOs on mobile surveillance observed BROWN exit his residence located on

² Based on my training and experience, Dormin is a sleep aid and is used as a cutting agent in the process of manufacturing narcotics for resale.

the 5100 block of West Washington Boulevard in Chicago, Illinois.³ BROWN entered a white Nissan Rogue (“Subject Vehicle 6”) and departed the area.⁴ LEOs continued to follow his vehicle.

9. According to CPD reporting, at approximately 9:31 a.m., LEOs monitoring electronic surveillance observed Subject Vehicle 6 arrive at the parking lot in front of the 14th Place Residence. At that time, BROWN exited Subject Vehicle 6 and entered the 14th Place Residence. Later that morning, at approximately 10:36 a.m., LEOs observed BROWN exit the 14th Place Residence carrying a weighted black plastic bag, enter Subject Vehicle 6, and depart the area.

10. According to CPD reports, LEOs on mobile surveillance followed Subject Vehicle 6 as it entered the expressway and drove erratically at a high speed. Subject Vehicle 6 exited the expressway and entered a gas station located at 43 North Homan Avenue. There, BROWN exited Subject Vehicle 6 and entered the store of the gas station. After a couple of minutes, BROWN exited the store with a bundle of U.S. currency in his hand. BROWN then fueled Subject Vehicle 6 and drove away from the gas station. LEOs on mobile surveillance continued to follow the vehicle until the vehicle reached the area of the Chicago and St. Louis drug spot.

³ Law enforcement identified JAUAN BROWN based on comparison to a prior arrest photograph found in the Chicago Police Department Data Warehouse system.

⁴ According to law enforcement databases, Subject Vehicle 6 is registered to JAUAN BROWN and Individual A at BROWN’s residence on the 5100 block of West Washington Boulevard.

11. According to CPD reports, at approximately 10:56 a.m., using electronic surveillance, LEOs observed Subject Vehicle 6 arrive and park near the intersection of North St. Louis Avenue and West Iowa Street, which is one block north of the Chicago and St. Louis drug spot. BROWN exited the driver's seat of Subject Vehicle 6 and appeared to engage in a conversation with several unidentified individuals who were standing on the sidewalk. BROWN then walked to the 800 block of North St. Louis Avenue and engaged in a conversation with several unidentified individuals standing next to a red Dodge minivan that was parked on the street.

12. According to CPD reports, moments later, BROWN and a woman ("Individual B") walked to Subject Vehicle 6 together. BROWN reached into the front passenger seat of Subject Vehicle 6, with Individual B standing directly behind him. BROWN then handed Individual B a weighted white plastic bag and Individual B walked towards the Dodge minivan with the white plastic bag. Individual B then entered the front passenger seat of the minivan.

13. According to CPD reports, LEOs then stopped BROWN, who was standing at approximately 3457 West Iowa, and Individual B, who was now sitting in the driver's seat of the Dodge minivan.

14. The LEOs who stopped BROWN ran a name check and determined that his driver's license was suspended. BROWN was placed into custody for driving on a suspended driver's license, based on surveillance LEOs' observations of his erratic driving in Subject Vehicle 6 earlier in the day. Stop officers also removed

Subject Vehicle 6 from its parked location near West Iowa and North St. Louis to the nearby Chicago police district. LEOs searched Subject Vehicle 6 and found 168 small zip lock bags containing suspected heroin, taped with purple tape, and wrapped inside a clear plastic bag, which was all inside of a white plastic bag. During a search of BROWN's person incident to his arrest, LEOs also recovered \$4,486 from BROWN. An officer issued BROWN a citation for driving with a suspended license, and he was released without further charges.

15. Upon stopping Individual B, LEOs also searched the Dodge minivan and located a white plastic bag in the third row. Inside the white plastic bag was a black plastic bag, consistent with the black plastic bag that LEOs observed BROWN carry out of the 14th Street Residence earlier that morning. Inside the black plastic bags were two clear plastic bags, one containing 168 small zip lock bags taped with purple tape, each containing suspected heroin and the other containing 168 small zip lock bags taped with yellow tape, each containing suspected crack cocaine. LEOs also seized \$1,724 from the vehicle. LEOs took Individual B into custody, but she was released without charges.

16. Based on my training and experience, and knowledge of the investigation, DTO members including BROWN frequently use multiple layers of plastic bags to conceal and transport narcotics for distribution. Specifically here, officers observed BROWN leaving the 14th Place Residence carrying a weighted black plastic bag containing suspected narcotics before entering Subject Vehicle 6. Later, BROWN handed Individual B from within Subject Vehicle 6 a white plastic

bag which was later, upon examination of the Dodge Minivan, found to contain within in it a black plastic bag containing narcotics consistent with the bag BROWN carried from the 14th Place Residence. Separately, BROWN's vehicle, Subject Vehicle 6, was found to contain a clear plastic bag inside a white plastic bag, all of which also contained narcotics.

17. HSI agents submitted the suspected heroin recovered from BROWN's vehicle to the U.S. Customs and Border Protection ("CBP") Laboratory for testing and analysis. Based on my review of the CBP lab report, of the 168 bags recovered from BROWN's vehicle on May 13, 2024, nine bags were tested and found to contain a mixture of heroin and fentanyl. Based on my review of the CBP lab report, the average estimated net weight of the contents of each tested bag was approximately 1.13 grams. Based on this average estimated net weight, the total estimated net weight of the mixture of heroin and fentanyl recovered from BROWN's vehicle is approximately 189.84 grams.⁵

⁵ Probable cause for the purposes of the instant complaint is limited to the narcotics recovered from BROWN's vehicle alone. However, HSI agents also submitted the suspected heroin and crack cocaine recovered from Individual B's vehicle to the U.S. Customs and Border Protection ("CBP") Laboratory for testing and analysis. Based on my review of the CBP lab report, of the 168 bags of suspected heroin recovered from Individual B's vehicle on May 13, 2024, nine bags were tested and found to contain a mixture of heroin and fentanyl. Based on my review of the CBP lab report, the average estimated net weight of the contents of each tested bag was approximately 1.14 grams. Based on this average estimated net weight, the total estimated net weight of the mixture of heroin and fentanyl recovered from Individual B's vehicle is approximately 191.52 grams. The type and quantity of narcotics recovered from Individual B's vehicle are thus consistent with those recovered from BROWN's vehicle.

Based on my review of the CBP lab report, of the 168 bags of suspected crack cocaine recovered from Individual B's vehicle, nine bags were tested and found to contain a mixture of cocaine and cocaine base. Based on my review of the CBP lab report, the average estimated net weight of the contents of each tested bag was approximately 0.29 grams.

18. Based on the foregoing, there is probable cause to believe that on May 13, 2024, JAUAN BROWN knowingly possessed with the intent to distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and 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, in violation of 21 U.S.C. § 841(a)(1).

FURTHER AFFIANT SAYETH NOT.

Chung S. Kim

CHUNG S. KIM

Special Agent, Homeland Security
Investigations

SWORN TO AND AFFIRMED by telephone January 6, 2025.

Jeffrey T. Gilbert

Honorable JEFFREY T. GILBERT
United States Magistrate Judge

Based on this average estimated net weight, the total estimated net weight of the mixture of cocaine and cocaine base recovered from Individual B's vehicle is approximately 49.03 grams.