

FILED

1/6/2025

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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

UNITED STATES OF AMERICA

CASE NUMBER: 1:25-cr-00004

v.

JAUAN BROWN

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 October 2, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant violated:

Code Section

Offense Description

Title 21, United States Code, Section 841(a)

knowingly possessing with intent to distribute a controlled substance, namely, 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 fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide), a Schedule II Controlled Substance

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

D. Belcher

DYLAN BELCHER

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

Jeffrey T. Gilbert

Judge's signature

City and state: Chicago, Illinois

JEFFREY T. GILBERT, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, DYLAN BELCHER, being duly sworn, state as follows:

1. I am a Special Agent with Homeland Security Investigations (HSI), and have been so employed since approximately June 2023. My current responsibilities include the investigation of narcotics trafficking offenses.

2. This affidavit is submitted in support of a criminal complaint alleging that JAUAN BROWN has violated Title 21, United States Code, Section 841(a). 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 a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), 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, information obtained from law enforcement records, my review of body worn camera footage and surveillance video, laboratory analysis, my training and experience, as well as the training and experience of other law enforcement agents.

I. FACTS SUPPORTING PROBABLE CAUSE

Summary of Probable Cause

4. On or about October 2, 2024, law enforcement executed a federal search warrant at 2340 West Taylor Street, Apartment 1, in Chicago (the "Taylor Street residence"), a suspected

stash house operated by members of a drug trafficking organization engaged in the distribution of heroin and fentanyl on Chicago's west side. As officers executed the warrant, they observed JAUAN BROWN exit the Taylor Street residence and place a red, black, and white plastic bag into a nearby white Nissan Rogue registered to BROWN (the "Nissan Rogue"). Officers approached BROWN and upon a protective pat down recovered approximately 57 grams of suspected crack cocaine in BROWN's jacket pocket. Later, officers observed in plain view the red, black, and white plastic bag in the front passenger seat of the Nissan Rogue, with a bundle of suspected narcotics visible inside. A subsequent search of the Nissan Rogue led to the recovery of approximately 1.17 kilograms of a substance that field tested presumptively positive for the presence of heroin and fentanyl.

Search Warrant Execution and Recovery of Narcotics from BROWN

5. On September 25, 2024, Magistrate Judge Maria Valdez authorized a search warrant for the Taylor Street residence (*see* 24 M 276). Probable cause for the search warrant included evidence that BROWN, along with other narcotics associates, used the Taylor Street residence as a stash house for the storage, preparation, and distribution of heroin and fentanyl. On separate instances in August and September of 2024, law enforcement had previously observed BROWN entering and exiting the Taylor Street residence with suspect narcotics and items associated with the manufacture of narcotics, such as cutting agents.

6. On or about October 2, 2024, at approximately 6:28 p.m., law enforcement officers monitoring electronic surveillance observed BROWN¹ exit the Taylor Street residence carrying a reusable plastic red, black, and white bag, as depicted below in Image 1. Seconds later, officers executed the aforementioned search warrant and observed BROWN quickly place the bag into

¹ Officers identified BROWN based on a positive comparison to his photograph within the Chicago Police Department Data Warehouse. Upon his detention, BROWN also identified himself verbally to officers.

the front passenger seat of the Nissan Rogue² when he observed officers approaching the residence to execute the search warrant. The Nissan Rogue was parked directly in front of the Taylor Street residence. At approximately 6:29 p.m., officers approached BROWN while wearing clearly visible “Police” markings and stated words to the effect of “Police, don’t move.” BROWN was compliant with commands and was placed into handcuffs without incident pending the execution of the search.

Image 1



7. Upon his detention, officers conducted a protective pat down of BROWN and located in BROWN’s left jacket pocket one knotted plastic bag that contained approximately 57 grams of a substance that subsequently field tested positive for the presumptive presence of crack cocaine.

² Based on a review of Illinois Secretary of State records, the white Nissan Rogue bearing Illinois registration DT18495 is registered to JAUAN BROWN and Individual A.

At approximately 7:09 p.m., officers transported BROWN to the Chicago Police Department Homan Square facility.

8. At approximately 7:18 p.m., as the Taylor Street residence was in the process of being secured, officers returned to the Nissan Rogue and as depicted below in Image 2, observed through the window in plain view on the front passenger seat what appeared to be the same red, black, and white plastic bag that BROWN had carried out of the Taylor Street residence prior to the search warrant execution. Within the plastic bag, officers observed a large quantity of suspected narcotics inside zip lock bags banded together with yellow tape, which, based on my training, experience, and knowledge of the investigation, is consistent with the packaging style for distribution used by the drug trafficking organization based in the Taylor Street residence. Based on this observation, officers conducted a search of the Nissan Rogue and located approximately 1.17 kilograms of suspected narcotics inside the plastic bag. Upon further inspection, the suspected narcotics were contained within four bundles of zip lock bags banded together with yellow tape. A field test of the suspected narcotics conducted on or about October 3, 2024, yielded a presumptively positive result for the presence of heroin and fentanyl.

Image 2



9. The search of the Taylor Street residence confirmed the location's use as a stash house. During the search, law enforcement recovered approximately 6.28 kilograms of heroin and 1.2 kilograms of crack cocaine, as well as items consistent with the storage, packaging, and distribution of narcotics. The narcotics recovered from BROWN's Nissan Rogue were packaged in a manner consistent with the narcotics recovered from the Taylor Street residence.

10. On or about October 3, 2024, at approximately 12:30 a.m., BROWN was read his *Miranda* rights, acknowledged verbally and in writing that he understood his rights, and agreed to speak with officers. In summary and not verbatim, BROWN admitted possession of the suspected crack cocaine that was found on his person at the time of his arrest. When officers asked about the red, black, and white bag he placed into the Nissan Rogue, BROWN said he believed there was a pair of sneakers in the bag.

II. CONCLUSION

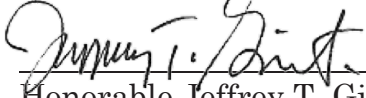
11. Based on the foregoing, there is probable cause to believe that on or about October 2, 2024, JAUAN BROWN did knowingly possess with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a quantity of a mixture and substance containing fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide), a Schedule II Controlled Substance, in violation of 21 U.S.C. § 841(a)(1).

FURTHER AFFIANT SAYETH NOT.

D. Belcher

DYLAN BELCHER
Special Agent, Homeland Security
Investigations (HSI)

SWORN TO AND AFFIRMED by telephone January 6, 2025.



Honorable Jeffrey T. Gilbert
United States Magistrate Judge