

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

WILLIAM DAVIS; and
also known as "Lil Earl"JAUAN BROWN
also known as "Juan"

CASE NUMBER: 1:25-cr-00005

~~UNDER SEAL~~

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 July 10, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants, WILLIAM DAVIS and JAUAN BROWN violated:

*Code Section*Title 18, United States Code, Section
922(g)(1)*Offense Description*

knowing that he has previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a loaded Taurus Model TH40 .40 caliber pistol, bearing serial number SMT59140, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

CHRISTOPHER PERUGINI
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

AFFIDAVIT

I, CHRISTOPHER PERUGINI, being duly sworn, state as follows:

I. Background

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 2020. 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, among other things, firearms offenses, including Title 18, United States Code, Sections 922 and 924.

2. This affidavit is submitted for the purpose of establishing probable cause to support a criminal complaint against WILLIAM DAVIS and JAUAN BROWN. Specifically, the complaint charges that on or about July 10, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, WILLIAM DAVIS and JAUAN BROWN, each knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a loaded Taurus Model TH40 .40 caliber pistol, bearing serial number SMT59140 (the “Taurus Pistol”), which firearm had traveled in interstate and foreign commerce prior to defendants’ possession of the firearm, in violation of Title 18, United States Code, Section 922(g)(1).

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of the criminal complaint against WILLIAM

DAVIS and JAUAN BROWN, 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 BROWN and DAVIS committed an offense in violation of Title 18, United States Code, Section 922(g)(1).

4. 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, my training and experience, as well as the training and experience of other law enforcement agents.

II. Facts Supporting Probable Cause

Background of Investigation

5. 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 Chicago and North St. Louis Avenue (the “Chicago and St. Louis drug spot”) on Chicago’s west side. As part of the investigation, law enforcement has conducted multiple rounds of court-authorized Title III interception of wire communications to and from multiple members of the DTO. As part of this investigation, law enforcement intercepted wire communications to and from telephone number (773) 562-0177 (“Target Phone 7”),

used by WILLIAM DAVIS.¹ During a period of court-authorized interception of Target Phone 7, WILLIAM DAVIS discussed the possession of a firearm. Shortly afterwards, law enforcement recovered a firearm from DAVIS following a meeting between DAVIS and JAUAN BROWN.

6. In summary, and as set forth in more detail below, on July 10, 2024, WILLIAM DAVIS and JAUAN BROWN possessed a Taurus Model TH40 .40 caliber pistol, bearing serial number SMT59140 (the “Taurus Pistol”).

Law Enforcement Recovers the Taurus Pistol from WILLIAM DAVIS Following a Meeting with JAUAN BROWN

7. On or about July 10, 2024, at approximately 7:03 a.m., DAVIS placed an outgoing call on Target Phone 7 to (XXX) XXX-6769, used by Individual C. During the conversation,² DAVIS asked “You uh...everybody come out yet [to the drug spot]?”

¹ On or about April 26, 2024, United States District Court Chief Judge Rebecca R. Pallmeyer, Northern District of Illinois, Eastern Division, authorized the renewed interception of wire communications to and from (XXX) XXX-6609, used by Individual A, the initial interception of wire communications to and from (773) 562-0177 (“Target Phone 7”), used by WILLIAM DAVIS, and the initial interception of wire communications to and from (XXX) XXX-1401, used by Individual B. This period of interception ended on or about May 25, 2024. On or about June 11, 2024, United States District Court Chief Judge Rebecca R. Pallmeyer, Northern District of Illinois, Eastern Division, authorized the renewed interception of wire communications to and from Target Phone 7, used by WILLIAM DAVIS, and the renewed interception of (XXX) XXX-1401, used by Individual B. This period of interception ended on or about July 11, 2024.

² The transcripts of the conversations described in this Affidavit remain in draft form. To the extent quotations from the conversations are included, they are preliminary, not final. The summaries of recorded conversations in this affidavit do not include reference to all of the topics covered during the conversations. In certain instances, I will offer my interpretations of certain recorded conversations in brackets and otherwise. My understanding of these conversations is aided by the contents and context of the conversations, my familiarity with the facts and circumstances of the investigation, my experience as a law enforcement agent, my discussions with other law enforcement agents and officers, the experience of other law enforcement agents and officers in this investigation, and other evidence developed during

Individual C stated, "Hell no. That's Tybookie though. Tybookie...I just told you Tybookie ass ain't been out." DAVIS stated, "So ain't nothing [narcotics] out there. No nothing." Individual C stated, "Hell no. I got... I got um I got Gusto's rocks [crack cocaine] though and my dubs [\$20 bags of heroin]." DAVIS asked, "Oh you got the yellow [narcotics]?" Individual C stated, "Dubs. Hell no." DAVIS stated, "Oh the dubs?" DAVIS then stated, "You got a lick [firearm] out...you got a lick out there?" Individual C stated, "Hell. Uh...oh, yeah they got that pipe [firearm] out." DAVIS stated, "Oh. For sure got my shit [firearm] on me. Find one of these little ass [UI] bet you I'll come through that bitch. Juan [JAUAN BROWN] ain't came out?" Individual C stated, "Hell no. Juan ain't came out. Motherfucker need all the slots they can get. Goofy hustling. Y'all know y'all gotta be outside at 7 bro. Ain't nobody driving to come and get y'all." DAVIS stated, "On Neal..." Individual C stated, "On my daughter, I'll work this bitch up [the open-air drug spot] myself. Make all the money. The fuck is wrong with y'all?" DAVIS stated, "So yeah, Tybookie and none of them motherfuckers out?" Individual C stated, "Yeah, yeah. I called...I called Tybookie and told his ass. That was Tybookie shit that be taking all day. I give that man a bundle [narcotics]. It take him two days to get a dub bundle off [sell the batch of narcotics]. Wheezy bring me a dub bundle and I get that shit off [sold it] yesterday." DAVIS stated, "Yeah cause he be playing. He doing everything. That's why I said, I'm...I'm on my way out [to the drug spot]. Get my shit [narcotics] back." Individual C stated, "Damn these n****s

the course of the investigation. The times listed for the recorded conversations are approximate.

goofy as hell. Boy, brothers goofy ass little shorties. You know I woulda kept me with usually come out with something on Bell grave.” DAVIS stated, “Missing all the P’s [narcotics customers].” Individual C stated, “Goofy ass little shorties.”

8. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that DAVIS and Individual C discussed the workers at the Chicago and St. Louis drug spot, as well as the status of the supply of narcotics available for resale at the Chicago and St. Louis drug spot. Furthermore, I believe that DAVIS stated he would possess a firearm while being involved in selling and distributing narcotics at Chicago and St. Louis drug spot. Lastly, I believe Individual C stated that the workers at the drug spot also possessed a firearm at the drug spot while selling narcotics.

9. Around five hours following the previous call, at approximately 12:06 p.m., DAVIS received an incoming call from Individual C. During the conversation, Individual C stated, “Yeah, you never just take all that shit.” DAVIS asked, “You say what? Yeah, man this goofy ass n****s give Juan [BROWN] my gun man.” Individual C asked, “Who?” DAVIS stated, “Shorty ass on the block.” Individual C stated, “Man.” DAVIS stated, “Knocking off my shit, boy. Goofy ass n**** out here gonna take all that shit.” Individual C asked, “Take all that drugs?” DAVIS asked, “On Neal.... He gave you some?” Individual C asked, “Who Juan?” DAVIS stated, “Yeah.” Individual C stated, “Nah, I ain’t get my shit [narcotics for resale] yet.” DAVIS stated, “On my daughter, his ass tripping. Then Juan don’t want to answer the phone. On Neal, I’m finna get right there on his ass. His ass tripping. The fuck is wrong with him. Taking

shit. I don't even know what I do.... Goofy ass. I told the man don't give nobody my shit. I was giving it [the Taurus Pistol] for his safety." Individual C stated, "Yeah this shit...Look...." DAVIS stated, "And he gonna get into it with Juan." Individual C stated, "Wait till Juan put his out there. He just gonna take Juan shit. That's all." DAVIS stated, "Nah boy. I'm finna go get my shit." Individual C stated, "Yeah, Juan's ass tweaking." DAVIS stated, "His ass tripping. On neal..." Individual C stated, "Yeah. That's good though. They did just get to it. They did say Beard [a CPD officer] just took type of shit [recovered narcotics at the Chicago and St. Louis drug spot]." DAVIS stated, "Yeah?" Individual C stated, "Yeah, on [UI] grave." DAVIS stated, "In the yard?" Individual C stated, "Yeah, Payroll just say they [law enforcement] went in and got them something. All type of purple packs [\$10 bags of heroin]. All type of shit." DAVIS stated, "I told you. I told him. I told y'all ass. That motherfucker watching, boy." Individual C stated, "That's why he ain't came back out."

10. Based on the intercepted call described above, my knowledge of the investigation and my training and experience, I believe that WILLIAM DAVIS stated that his firearm, later identified as the Taurus Pistol, was taken by a worker involved in the sale of narcotics at the Chicago and St. Louis drug spot and given to JAUAN BROWN. I believe that DAVIS stated he gave the Taurus Pistol to a seller of narcotics at the Chicago and St. Louis drug spot so that the worker could possess that Taurus Pistol while selling narcotics for his/her protection. Furthermore, WILLIAM DAVIS stated that along with his Taurus Pistol, JAUAN BROWN also had the resupply of

narcotics for the Chicago and St. Louis drug spot. Lastly, WILLIAM DAVIS told Individual C that he was going to get the Taurus Pistol back from JAUAN BROWN.

11. In response to the intercepted call described above, law enforcement initiated surveillance at the residence located at 5133 West Washington Boulevard (the “Washington Blvd Residence”), a residence known to be used by JAUAN BROWN based on prior surveillance and vehicle registration information. At approximately 12:17 p.m., officers observed DAVIS driving a gold Buick sedan bearing Illinois license plate EA57362³ arrive at the Washington Blvd Residence and enter the residence.

12. Shortly afterwards, at approximately 12:32 p.m., officers monitoring electronic surveillance and on mobile surveillance observed DAVIS and BROWN exit the Washington Blvd Residence. A few moments later, DAVIS walked to the trunk of the gold Buick sedan, opened the trunk, looked around and reached into his front waistband. At this time, DAVIS reached his hand into the trunk area of the gold Buick sedan towards the rear seat. DAVIS then closed the trunk of the gold Buick sedan and entered the driver’s seat. At the same time, BROWN entered the driver’s seat of a white Nissan Rogue bearing Illinois license plate DT18495 that was parked behind DAVIS’ gold Buick sedan.⁴ Both vehicles then departed the area in tandem. In response to this, officers initiated mobile surveillance on both vehicles.

³ Based on law enforcement databases, the gold Buick sedan bearing Illinois license plate EA57362 is registered to WILLIAM DAVIS at 1233 South Lawndale Avenue, Chicago, IL.

⁴ Based on law enforcement databases, the white Nissan Rogue bearing Illinois license plate DT18495 is registered to Katrina Williams and JAUAN BROWN at 5133 West Washington Boulevard, #3, Chicago, IL.

13. Based on the intercepted calls and surveillance described above, my knowledge of the investigation, and my training and experience, I believe that DAVIS retrieved the Taurus Pistol from BROWN at the Washington Blvd Residence, which is believed to be BROWN's residence.⁵ DAVIS then stored the Taurus Pistol in the trunk of the gold Buick sedan.

14. Shortly afterwards, at approximately 12:36 p.m., DAVIS placed an outgoing call to telephone number (773) 565-5407, used by JAUAN BROWN.⁶ During the conversation, DAVIS stated, "She said she on her way to the house." BROWN stated, "Shit, aight. We on our way too." DAVIS stated, "I'm finna go over here real quick. She on a bus." BROWN stated, "Hey brody, listen." DAVIS stated, "Today. I'm gonna make sure you get this gun, bro. On neal, because y'all ass tweaking. Steady sweating me on some shit but a motherfucker..." BROWN stated, "Yeah, I was getting what you was saying. You was getting to me. What you said, You was scared to ride with..." Later in the conversation, BROWN stated, "Hold on. Hold on, Lil Earl [WILLIAM DAVIS]. Shut up, shut... don't say nothing about that." At this point in the intercepted call, BROWN was conducting a facetime call from another cellular telephone in his possession. In the background of the intercepted call, BROWN

⁵ LEOs believe BROWN to reside in part at the Washington Boulevard Residence based on the car registration of the white Nissan Rogue mentioned above, as well as surveillance of BROWN coming and going from the residence during the investigation.

⁶ As discussed further below, officers identified JAUAN BROWN as the user of (773) 565-5407 during a traffic stop on or about July 10, 2024, at the Chicago and St. Louis drug spot through voice comparison.

stated, "I'm following [UI], Lil Earl. Cause I just took this gun [the Taurus Pistol] from his ass. I'm finna get this other one [firearm] from him."

15. At approximately 12:39 p.m., DAVIS called Individual C. During the conversation, Individual C stated, "Yeah, Lil Earl." DAVIS stated, "This man [JAUAN BROWN] so funny." Individual C asked, "He gave it [the Taurus Pistol] back?" DAVIS stated, "Hell yeah, I was going to get my shit back. That's why I went to the house. He got me fucked up. I don't care what I owe you and what I said boy, your ass tweak." Individual C stated, "Lame ass." The two then carried on a conversation about the drug spot.

16. Based on the surveillance and intercepted calls described above, I believe that BROWN told an unidentified individual that he had earlier retrieved the Taurus Pistol from DAVIS and was seeking another firearm from DAVIS. For his part, DAVIS separately told individual C that he retrieved the Taurus Pistol from BROWN at BROWN's residence.

17. According to CPD reports, at approximately 12:47 p.m., officers while maintaining mobile surveillance on DAVIS, in the gold Buick, and BROWN, in the white Nissan Rogue, observed DAVIS and BROWN travel in tandem to the Chicago and St. Louis drug spot. Upon arriving at the drug spot, DAVIS and BROWN exited their vehicles and BROWN met with an unidentified individual at the drug spot, while DAVIS attempted to cross over to the west side of St. Louis Avenue on foot. While crossing the street, officers initiated an investigatory street stop on DAVIS. During this street stop, DAVIS produced his State of Illinois identification card.

Officers conducted a name check in law enforcement databases which revealed DAVIS' driver's license to be suspended. Based on the wire communications described above, as well as surveillance, officers conducting the street stop believed that DAVIS was driving the gold Buick sedan and that DAVIS possessed a firearm in the Buick. Additionally, officers conducting the street stop had prior knowledge that DAVIS is a convicted felon. As such, officers detained DAVIS. During the street stop of DAVIS, BROWN departed the Chicago and St. Louis drug spot on foot and entered a grocery store located at 3452 West Chicago Avenue, approximately one block away.

18. While still on scene with DAVIS, officers observed BROWN return on foot to the Chicago and St. Louis drug spot. At approximately 12:55 p.m., officers conducted an investigatory stop on BROWN.⁷ At this time, BROWN produced his State of Illinois identification card and gave verbal consent search his white Nissan Rogue. Law enforcement searched BROWN's Nissan, with negative results. At the conclusion of the vehicle search, officers transported DAVIS and the Buick to the 11th District Chicago Police Station for driving on a suspended license.

19. Once at the 11th District Chicago Police Station, officers conducted a search of the Buick. In the trunk of the vehicle, where officers on surveillance had observed DAVIS reach into earlier in the day, officers recovered the Taurus Pistol, a firearm magazine, and ammunition.

⁷ Officers on the investigatory stop of BROWN compared his voice to the previous intercepted phone call described above (call session #23305) and determined BROWN to be the user of (773) 565-5407.

20. Based on the intercepted calls and surveillance described above, my knowledge of the investigation, and my training and experience, I believe that DAVIS retrieved the Taurus Pistol from JAUAN BROWN and traveled with the Taurus Pistol to the Chicago and St. Louis drug spot, in order to further the narcotics trafficking activity that was occurring at the Chicago and St. Louis drug spot. Specifically, in an above-described intercepted call, DAVIS stated that the firearm was used for protection while at the Chicago and St. Louis drug spot.

21. According to CPD reports, shortly afterwards, DAVIS was issued a traffic citation for driving on a suspended license. DAVIS was then released from the 11th District Chicago Police Station without charges for the Taurus Pistol. Furthermore, law enforcement advised DAVIS that he could not drive the gold Buick sedan and would need a licensed operator to drive the vehicle from the police parking lot.

22. After being released from the 11th District Chicago Police Station, at approximately 2:21 p.m., DAVIS placed an outgoing phone call to Individual C. During the conversation, Individual C asked, "You good?" DAVIS stated, "Yeah. Hey, they was searching the car?" Individual C stated, "They [the police] ain't search your car. They searched Juan's shit [the White Nissan Rogue]." DAVIS stated, "Right, but what I'm saying, they pulled off with my car [the gold Buick sedan], right?" Individual C stated, "Yeah." DAVIS stated, "Right. Yeah, they went to the station and searched my shit, boy." Individual C asked, "They found the pipe [the Taurus Pistol]?" DAVIS stated, "Hell yeah, they found that bitch. I don't see it." Individual C asked, "So where

your car?" DAVIS stated, "I'm in my shit." Individual C stated, "That's good then. Lord, you got your car." DAVIS stated, "Shorty, hell nah." The two then carried on further conversation.

23. Based on the intercepted call described above, my knowledge of the investigation, and my training and experience, I believe that DAVIS told Individual C that the police recovered the Taurus Pistol from his Buick during his arrest.

24. Shortly afterwards, at approximately 2:59 p.m., DAVIS placed an outgoing call to telephone number (XXX) XXX-4367, used by an unidentified male (UM-4367). During the conversation, DAVIS stated, "On my daughter, shorty, they just had me and Juan and they just found a pipe [the Taurus Pistol] in my shit." UM-6347 stated, "Damnnnn..." DAVIS stated, "And let me go shorty. Just booked me for some traffic shit, shorty." UM-6347 stated, "That's something wicked there Lil Earl. I ain't gone lie." DAVIS stated, "That's what I'm saying. But bro was like man joe, he like what they do. Shit, I got out the car and they turned their lights on. They said my name like yeah you got a warrant, I mean you're suspended. I'm like yeah wassup. He like you know you suspended. I'm yeah. Whole time his ass straight on some other shit. Grabbed Juan, searched it. But see they searched my shit but they took my shit to Harrison and Kedzie [the 11th District Chicago Police Station] and searched my shit." UM-6347 stated, "Right, right." DAVIS stated, "But lord just said like it's a new law that if they pull you over for traffic, they find a gun they can't charge you with it because it's a traffic stop." UM-6347 stated, "I don't know." DAVIS stated, "I don't know, that shit just scared the fucked out me."

25. Based on the intercepted call described above, my knowledge of the investigation, and my training and experience, I believe that DAVIS told UM-6347 that the police recovered the Taurus Pistol from his vehicle during his arrest for driving on a suspended license.

26. Shortly afterwards, at approximately 3:16 p.m., DAVIS placed an outgoing call to telephone number (XXX) XXX-6639, used by an unidentified female (UF-6639). During the conversation, DAVIS stated, "They just let me go from the police station." UF-6639 asked, "How you get locked up?" DAVIS stated, "Man, I just pulled up on the block [the Chicago and St. Louis drug spot]. Just coming from [UI] and shit out of the Trans⁸ ... stopped. I mean, I was out the car and everything. Man, Jo... I just lost my gun [the Taurus Pistol] and everything." UF-6639 asked, "They...went in your car?" DAVIS stated, "Yeah, that's what's fucking me up. Like they let me get the car and let me go." UF-6639 asked, "But they kept the gun?" DAVIS stated, "Yeah, they kept the gun. I don't understand that one. But I'm out. Shit I'm just glad." UF-6639 stated, "Well, good thing you out." Later in the conversation, DAVIS stated, "This shit blew the fuck out of me." UF-6639 stated, "I bet." DAVIS stated, "My brother-in-law [JAUAN BROWN] goofy ass. If you would've never took the gun [the Taurus Pistol] off the block [the Chicago and St. Louis drug spot], my shit [the Taurus Pistol] would still be on the block. You took it from shorty talking about I give it to you. Why the fuck? His ass is goofy."

⁸ Based on my training and experience, and knowledge of this investigation, I know "Trans" to be short for "Transformer," a term used as slang for an unmarked Chicago Police vehicle.

27. Based on the intercepted call described above, my knowledge of the investigation, and my training and experience, I believe that DAVIS told UF-6639 that the police recovered the Taurus Pistol during a traffic stop. Furthermore, during the investigative stop earlier in the day, DAVIS stated that BROWN was his brother-in-law, and I believe that DAVIS told UF-6639 that if BROWN did not take the Taurus Pistol from the Chicago and St. Louis drug spot, then the Taurus Pistol would still be at the Chicago and St. Louis drug spot and not in the possession of law enforcement.

28. Shortly afterwards, at approximately 4:51 p.m., DAVIS received an incoming call from (XXX) XXX-5030, used by an unidentified female (UF-5030). During the conversation, DAVIS stated, "The motherfucker police just tore my motherfucking car up." UF-5030 asked, "That's crazy, what they do?" DAVIS stated, "Man, they [the police] found the gun [the Taurus Pistol] and everything in this bitch." UF-5030 asked, "So where you at?" DAVIS stated, "I'm right here in the car. They gave me the car back and everything." UF-5030 stated, "Because they got other things to deal with. Killers, murder, people, that ain't nothing. Eventually there's too much going on. They got other stuff to do. So what did you call Jauan [BROWN] for?" DAVIS stated, "That's Jauan [BROWN's] gun [the Taurus Pistol]." UF-5030 stated, "Glad them kids wasn't in there." DAVIS stated, "This happened because Jauan goofy ass. He gonna go take the gun [the Taurus Pistol] from them [the sellers of narcotics] off the block [the Chicago and St. Louis drug spot]. And his goofy ass gonna give it to them." UF-5030 stated, "That's crazy." DAVIS stated, "So I had to go back and get

the gun, and then coming back over there, I'm out the car the whole time, motherfuckers called and said something about a gun anyway. So the lady, Tybookie goofy ass threw the gun on the ladies porch." Later in the conversation, DAVIS stated, "When I went over there to the house [the Washington Boulevard Residence] and got it [the Taurus Pistol]. I stuck that bitch in the back [the trunk of the gold Buick sedan]. I know they found that bitch, cause I took all those clothes up out of there." UF-5030 asked, "So how do you get the gun back?" DAVIS stated, "They ain't gonna give the gun back, they kept the gun. Hell nah, they let me go and kept the gun. They ain't even tell me nothing about them having the gun. They right there acting cool and everything, hey man look." UF-5030 asked, "They got it out your car?" DAVIS stated, "They had to. I put it in the trunk. I put that bitch in the trunk."

29. Based on the intercepted call described above, my knowledge of the investigation, and my training and experience, I believe that DAVIS told UF-5030 that the police recovered the Taurus Pistol from the trunk of his gold Buick sedan. Furthermore, I believe that DAVIS stated that if JAUAN BROWN hadn't possessed and taken the Taurus Pistol from the Chicago and St. Louis drug spot, then the Taurus Pistol would still be at the drug spot. Lastly, I believe that DAVIS stated he retrieved the Taurus Pistol from JAUAN BROWN at BROWN's residence at the Washington Boulevard Residence and stashed the Taurus Pistol in the trunk of his vehicle, which is where law enforcement recovered the Taurus Pistol.

Analysis of the Taurus Pistol

30. According to an analysis conducted by the CPD Crime Laboratory Division, on or about July 23, 2024, the Taurus Pistol successfully test fired semi-automatically.

31. According to a Bureau of Alcohol, Tobacco, Firearms, and Explosives interstate nexus expert, the Taurus Pistol was manufactured outside the state of Illinois, and thus travelled in interstate commerce by the point it was possessed by DAVIS and BROWN.

*WILLIAM DAVIS' and JAUAN BROWN's Prior Convictions and
Knowledge of Their Prohibited Status*

32. According to law enforcement databases and a query in the Cook County dockets database, on or about October 24, 2016, WILLIAM DAVIS was convicted in the Circuit Court of Cook County of conspiracy to sell controlled substances to those under the age of 18 and possession of a controlled substance, for which he was sentenced to six years and one years' custody with the Illinois Department of Corrections. On September 4, 2018, DAVIS signed a PSN Notification Letter acknowledging that as a felon he could not possess a firearm, and that doing so would subject him to potential federal prosecution.

33. According to law enforcement databases and a query in the Cook County dockets database, on or about September 7, 2017, BROWN was convicted in the Circuit Court of Cook County of possession of a controlled substance, for which he was sentenced to two years' imprisonment with the Illinois Department of Corrections. On March 25, 2019, BROWN signed a PSN Notification Letter

acknowledging that as a felon he could not possess a firearm, and doing so would subject him to potential federal prosecution.

III. Conclusion

34. Based on the foregoing, there is probable cause to believe that on or about July 10, 2024, WILLIAM DAVIS unlawfully possessed a firearm, knowing he had previously been convicted of a crime punishable by a term of imprisonment exceeding one-year, which firearm had traveled in interstate and foreign commerce prior to WILLIAM DAVIS' possession of the firearm.

35. Based on the foregoing, there is probable cause to believe that on or about July 10, 2024, JAUAN BROWN unlawfully possessed a firearm, knowing he had previously been convicted of a crime punishable by a term of imprisonment exceeding one-year, which firearm had traveled in interstate and foreign commerce prior to JAUAN BROWN's possession of the firearm.

FURTHER AFFIANT SAYETH NOT.

Christopher Perugini

CHRISTOPHER PERUGINI

Special Agent, Homeland Security
Investigations (HSI)

SWORN TO AND AFFIRMED by telephone January 6, 2025

Jeffrey T. Gilbert

Honorable JEFFREY T. GILBERT
United States Magistrate Judge