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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

BRIAUNNA MOORE

CASE NUMBER: 1:25-cr-00012

**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 June 21, 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 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] propenamide), a Schedule II Controlled Substance

This criminal complaint is based upon these facts:

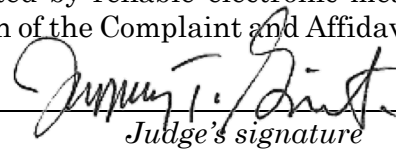
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CHUNG S. KIM

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 signature*City 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 BRIUANNA MOORE 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 MOORE with possession of heroin and fentanyl with intent to distribute, 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 video, 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.

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 June 21, 2024, law enforcement had identified a suspected DTO stash house at 1066 West 14th Place (the “14th Place Residence”),<sup>1</sup> where law enforcement observed activity consistent with narcotics trafficking and conducted a trash pull resulting in the recovery of materials related to narcotics preparation and packaging. As part of the investigation, law enforcement also conducted multiple rounds of court-authorized Title III interception of wire communications, including communications to and from telephone number (312) 219-1401 (“Target Phone 8”), used by Individual A.

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<sup>1</sup> 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.

6. On multiple occasions during the investigation, surveillance officers observed Individual A engage in what appeared to be narcotics-related activity. For example, on March 19, 2024, at approximately 1:52 p.m., officers monitoring electronic video surveillance observed Individual A arrive at the 14th Place Residence in a black Cadillac Escalade and enter the residence. At approximately 2:06 p.m., Individual A exited the 14th Place Residence and departed in the Escalade, arriving at the Chicago and St. Louis drug spot at approximately 2:41 p.m. There, multiple unidentified individuals approached the front driver's side door of the Escalade and reached inside. Based on surveillance officers' training and experience, and their surveillance of the drug spot throughout the investigation, these actions appeared to be hand-to-hand narcotics transactions. Officers also observed Individual A make similar deliveries of suspected narcotics on June 13 and June 17, 2024, as well as the June 21, 2024, delivery to MOORE, which is described further below.

7. On another occasion, May 9, 2024, at approximately 3:58 p.m., a court-authorized wire intercept of a call between Individual A, using Target Phone 8, and an unidentified female captured conversation and background noise.<sup>2</sup> At that time,

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<sup>2</sup> The summaries of intercepted conversations in this affidavit do not include references to all of the topics covered during the conversations. Quoted material from the recorded conversations as set out in this affidavit is taken from draft summaries, not final transcripts. In addition, the summaries do not include references to all statements made by the speakers on the topics that are described by the speakers. In certain paragraphs describing conversations set forth herein, my interpretations of the discussion are included in brackets. These interpretations include meanings attributed to code words, coded language, or vague references used by the speakers. My understanding and interpretation of the conversations is based upon the contents of the conversations, the context of prior and subsequent conversations, my knowledge derived from this investigation, my experience and training, and the experience and training of other law enforcement agents and officers related to narcotics trafficking.

based on electronic surveillance, Individual A was inside the 14th Place Residence. Approximately 30 seconds into the intercepted call, officers monitoring the interceptions could hear what sounded like a blender in the background. Based on my training and experience, blenders are used in the process of manufacturing narcotics for resale, to mix cutting agents with narcotics prior to the narcotics being packaged for resale. A few seconds later, Individual A stated, “put that shit [narcotics] in a bag or something.” Based on their monitoring of intercepted calls, this statement did not appear to officers to be directed to the unidentified female on the phone with Individual A, but rather someone with Individual A inside the 14th Place Residence.

8. On June 21, 2024, at approximately 8:34 a.m., a court-authorized wire intercept of a call between Individual A, using Target Phone 8, and an unidentified female (“UF-6907”) again captured conversation and background noise. At that time, based on electronic surveillance, Individual A was inside the 14th Place Residence. Officers monitoring the interceptions could hear what sounded like a chopping noise in the background of the call. Based on my training and experience, the chopping noise captured over the intercepted call indicated that Individual A or others inside the 14<sup>th</sup> Place Residence were in the process of cutting, mixing, and otherwise preparing narcotics for resale. During the intercepted call, Individual A stated, “I’m finna to be done. I’m finna to be done in a minute. . . in a couple, prolly like two hours or something.” UF-6907 stated, “Aight, call me as soon as you done.” Individual A stated, “Aight.”

9. At approximately 11:46 a.m. on June 21, 2024, a law enforcement officer monitoring electronic surveillance observed Individual A exit the 14<sup>th</sup> Place Residence carrying a weighted black plastic bag and enter the driver's seat of a vehicle in the parking lot of the 14<sup>th</sup> Place Residence ("Subject Vehicle 8"). Two other unidentified individuals also entered the vehicle, one in the front passenger seat and one in the rear passenger seat.

10. At approximately 11:55 a.m. on June 21, 2024, Subject Vehicle 8 departed the area. After making one stop on the 3400 block of West Greshaw, Subject Vehicle 8 arrived at the 700 block of North Christiana Avenue at approximately 12:14 p.m. Based on my review of electronic surveillance video from that location, a woman who was later identified as MOORE, as described below, approached the passenger side of Subject Vehicle 8 on foot, and then returned to the sidewalk carrying a weighted black plastic bag. Subject Vehicle 8 then departed the area.

11. Based on my review of surveillance video, MOORE then walked across North Christiana Avenue towards a tan Pontiac Grand Prix carrying a weighted black plastic bag.<sup>3</sup> Another woman ("Individual B") accompanied MOORE. MOORE appeared to access the passenger side of the Pontiac, but her actions at the side of the car were not visible on camera. MOORE, who was no longer carrying the black plastic

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<sup>3</sup> According to law enforcement databases, this vehicle was registered to MOORE on June 21, 2024.

bag as she was when she approached the Pontiac, and Individual B then walked away from the vehicle.

12. At approximately 12:20 p.m. on June 21, 2024, electronic surveillance video captured MOORE and Individual B returning to the Pontiac. This time, MOORE entered the driver's seat of the vehicle and Individual B entered the front passenger seat. Law enforcement officers ("LEOs") arrived in an unmarked police vehicle, exited their vehicle, and approached MOORE, Individual B, and the Pontiac on foot. As LEOs approached, MOORE and Individual B both exited the Pontiac.

13. Based on my review of CPD reports and body-worn camera video, as they approached, LEOs observed MOORE carrying a clear cup containing what they suspected to be an alcoholic beverage.<sup>4</sup> An officer approaching MOORE on the driver's side of the Pontiac also observed a black plastic bag on the driver's seat where MOORE had been seated. Based on his training and experience, as well as the prior investigation in this case, the officer believed that the black plastic bag contained narcotics. He seized the bag, which contained three strips of 14 zip lock bags taped together with blue tape, each containing suspected heroin.

14. Based on my review of CPD reports and body-worn camera video, LEOs further searched the Pontiac and recovered another black plastic bag in the glove compartment. Inside this black plastic bag were two zip lock bags containing 26 strips

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<sup>4</sup> According to CPD reports, LEOs identified MOORE during the course of this stop when she presented her valid Illinois driver's license. They also compared their observations of her during this stop with a known photograph of her from the Chicago Police Department Data Warehouse system.

of 14 smaller zip lock bags taped together with blue tape, each containing suspected heroin.

15. Based on my review of CPD reports and body-worn camera video, MOORE informed officers during their search of the Pontiac that she had cannabis stored in the trunk. LEOs searched the trunk and seized both a clear plastic bag containing suspected cannabis and another black plastic bag containing U.S. currency and two strips of 14 zip lock bags taped together with yellow tape, each containing suspected heroin.

16. The suspected narcotics were submitted to the U.S. Customs and Border Protection laboratory for testing and analysis. Based on my review of the laboratory reports, of the 26 strips of 14 small zip lock bags seized from the glove compartment of the Pontiac, the lab tested a sample of nine small zip lock bags and determined that each contained a mixture of heroin and fentanyl. The estimated net weight of the mixture in each bag was approximately 0.66 grams. Based on the estimated net weight of the narcotics in this sample, the total estimated net weight of the narcotics seized from the glove compartment of the Pontiac is approximately 240.24 grams.

17. Based on my review of the laboratory reports, the narcotics seized from the front seat of the Pontiac were not separately sampled for testing. However, based on my training and experience and the investigation to date, I believe that the suspected heroin from the front seat of the Pontiac and the tested sample from the glove compartment containing a mixture of heroin and fentanyl were from the same batch, given their similar packaging. Therefore, based on the estimated net weight of



the narcotics in the sample from the glove compartment, the total estimated net weight of the narcotics seized from the front seat of the Pontiac is approximately 27.72 grams of heroin mixed with fentanyl.

18. Based on my review of the laboratory reports regarding the evidence seized from the trunk of the Pontiac, of the two strips of 14 small zip lock bags sealed with yellow tape, nine small zip lock bags were tested and determined to be a mixture of heroin and fentanyl. The estimated net weight of the mixture in each bag was approximately 1.12 grams. Based on the estimated net weight of the narcotics in this sample, the total estimated net weight of the heroin and fentanyl mixture recovered from the trunk is approximately 31.51 grams. The lab also tested two portions of plant material seized from the trunk of the Pontiac and determined that it was a mixture of cannabis and cannabidiol with a net weight of approximately 424.2 grams.

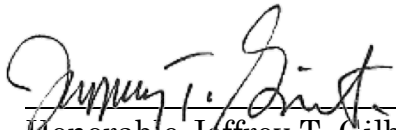
19. Based on the foregoing, there is probable cause to believe that, on June 21, 2024, BRIUANNA MOORE knowingly possessed with the intent to distribute a controlled substance, namely, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide), 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.

  
Honorable Jeffrey T. Gilbert  
United States Magistrate Judge