
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

EYANNA ROSS

CASE NUMBER: 1:25-cr-00010

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 April 3, 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 and intentionally distributing a controlled substance, namely, a quantity 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-piperindinyl] propanamide), a Schedule II Controlled Substance

This criminal complaint is based upon these facts:

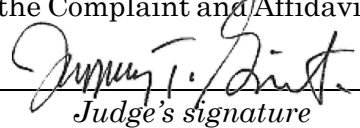
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CHRISTOPHER B. PERUGINI

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, CHRISTOPHER B. PERUGINI, 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 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 narcotics trafficking offenses, including Title 21, United States Code, Section 841.

2. This affidavit is submitted in support of a criminal complaint alleging that EYANNA ROSS 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 ROSS with distribution of 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, 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.

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 Chicago and North St. Louis Avenue (the “Chicago and St. Louis drug spot” or “the drug spot”). In summary, and as described in more detail below, this investigation included court-authorized wire interceptions of phone number (773) 290-4788 (“Target Phone 2”), on which an undercover law enforcement officer (“UC-9”) communicated with Terrell Stephens to coordinate controlled purchases of heroin and fentanyl. On April 3, 2024—while Stephens was in custody at the Cook County Department of Corrections—defendant EYANNA ROSS communicated with UC-9 on Target Phone 2 to sell UC-9 over 40 grams of a mixture of heroin and fentanyl that was supplied to her for the deal by Individual A.

5. According to CPD reports, on April 2, 2024, at approximately 7:54 p.m., UC-9 sent a recorded text message to Target Phone 2, then used by Stephens,¹ that read, “Yo yo.” Stephens responded with the text message, “Yo.” UC-9 sent the text message, “You gon be around [to sell narcotics] tomorrow?” Stephens replied with the

¹ Among other corroborating evidence, law enforcement’s identification of Stephens as the user of Target Phone 2 included evidence that on January 31, 2024, and March 6, 2024, Stephens appeared at specified times and locations to sell narcotics to UC-9 consistent with the discussions he had with UC-9 on Target Phone 2.

text message, “Yessir.” UC-9 sent the text message, “Ight Imma slide on [meet with] you about 10 a.m. for 25 [zip lock bags] of the big boys [\$20 bags of heroin].” Stephens replied with the text message, “Yessir.” Based on the recorded text message exchange described above, my knowledge of the investigation, and my training and experience, I believe that UC-9 requested to purchase 25 bags of heroin from Stephens for \$20 each.

6. According to CPD reports, law enforcement learned that on or about April 2, 2024, Stephens was arrested for the possession of an illegal amount of cannabis and was held in custody at the Cook County Department of Corrections. However, on or about April 3, 2024, at approximately 9:24 a.m., UC-9 received an unrecorded call from Target Phone 2, during which UC-9 had a conversation with a woman later identified as ROSS. According to UC-9, in summary and not verbatim, during their conversation, ROSS asked UC-9 if UC-9 was still interested in purchasing 25 bags of heroin. UC-9 asked where Stephens was, and ROSS stated that Stephens was not around. ROSS indicated to UC-9 that she would sell the narcotics to UC-9. UC-9 stated that he/she would be ready to meet with ROSS in 45 minutes.

7. According to CPD reports, at approximately 10:18 a.m., UC-9 placed a recorded call to Target Phone 2 and ROSS answered the call. UC-9 stated, “I’m a be at the Dunkin’ [Donuts] by the Kedzie Mall in like 10 minutes.” ROSS stated, “No, don’t go there. Come to, um...Homan [Avenue] and Harrison [Street].” UC-9 asked, “Where? Where? Homan and Harrison?” ROSS replied, “Yeah.” UC-9 acknowledged, “Aight.”

8. According to CPD reports, less than a minute later, law enforcement officers (“LEOs”) using electronic surveillance, observed a blue BMW sedan arrive and park at a gas station located at the corner of South Homan Avenue and West Harrison Street.² Shortly afterwards, at approximately 10:29 a.m., UC-9 arrived in an undercover vehicle, parked, and walked towards the BMW.³ According to UC-9, UC-9 observed ROSS sitting in the front driver’s seat of the BMW.⁴ At that time, UC-9 entered the rear passenger seat of the BMW and ROSS exited saying, “I got you right here [with the narcotics].”⁵ UC-9 replied, “I thought you were coming in.” But ROSS exited the vehicle and began fueling the BMW.

9. According to CPD reports, at approximately 10:32 a.m., LEOs monitoring electronic surveillance observed a gold Buick arrive and park at the gas pump next to the BMW.⁶ At that time, ROSS entered the rear passenger seat of the Buick. Shortly after, Individual A exited the Buick, opened its trunk, and placed an

² At the time, law enforcement was tracking this vehicle, which was registered to Stephens, pursuant to a warrant.

³ UC-9 was equipped with an audio and video recording device during the controlled purchase.

⁴ UC-9 and LEOs monitoring electronic surveillance identified EYANNA ROSS based on comparison to her previous arrest photograph found in the Chicago Police Data Warehouse system.

⁵ Following the transaction, UC-9 later conducted a voice comparison of his/her recorded phone call with the previously unidentified female who was using Target Phone 2 on April 3, 2024, with the audio/video recording of his/her meeting with ROSS and determined that ROSS was the user of Target Phone 2 on April 3, 2024.

⁶ According to law enforcement databases, this vehicle was registered to Individual A on April 3, 2024.

unknown item in the front pocket of his sweater, and returned to the driver's seat of the Buick.⁷

10. According to CPD reports, at approximately 10:32 a.m., an unidentified female ("UF-1") exited the shop inside the gas station and entered the front passenger seat of the BMW. UF-1 did not engage in the narcotics transaction. ROSS then exited the Buick, entered the rear passenger seat of the BMW, and sat next to UC-9 with her hand inside her sweater pocket.

11. According to UC-9 and LEOs' review of UC-9's audio/video recording device footage, while inside the vehicle, ROSS pulled out a plastic bag from her sweater pocket and removed a Popeyes paper bag from inside the plastic bag, which contained multiple smaller zip lock bags sealed with black tape that contained suspected heroin. At that time, ROSS asked UC-9, "That the whole five [hundred dollars]?" UC-9 replied, "Yup, that's the whole five hundred. Count that." ROSS pulled out a bundle of zip lock bags that contained suspected heroin from the Popeyes paper bag, counted the amount of zip lock bags, and separated 25 zip lock bags from the bundle. ROSS then handed UC-9 the 25 zip lock bags that contained suspected heroin in exchange for \$500. UC-9 stated, "Count that." ROSS counted the money UC-9 provided her and stated, "Alright, you good." UC-9 replied, "Alright." UC-9 then exited the BMW, returned to his/her vehicle, and departed the area.

⁷ LEOs identified Individual A based on comparison to his previous arrest photograph in the Chicago Police Data Warehouse System.

12. Based on the electronic surveillance and covert video from UC-9 described above, my review of CPD reports, my knowledge of the investigation, and my training and experience, I believe that Individual A was storing the suspected heroin in the trunk of the Buick, which he retrieved from the trunk and supplied to ROSS while she was sitting in the Buick. ROSS then brought the suspected heroin back to the BMW concealed inside her sweater pocket to sell to UC-9.

13. HSI agents submitted the suspected heroin 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 25 bags purchased from ROSS on April 3, 2024, seven 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 1.87 grams. Based on this average estimated net weight, the total estimated net weight of the mixture of heroin and fentanyl seized is approximately 46.78 grams.

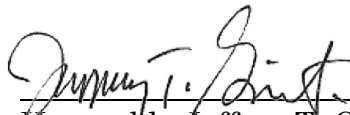
14. Based on the foregoing, there is probable cause to believe that on or about April 3, 2024, EYANNA ROSS knowingly and intentionally distributed a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER AFFIANT SAYETH NOT.

Christopher Perugini

CHRISTOPHER B. PERUGINI
Special Agent, Homeland Security
Investigations

SWORN TO AND AFFIRMED by telephone January 6, 2025.



Honorable Jeffrey T. Gilbert
United States Magistrate Judge