

1:24-cr-00594
Judge Franklin U. Valderrama
Magistrate Jeffrey Cole FILED CAT 4

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

JUN 05 2025

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

UNITED STATES OF AMERICA

v.

ANDRE DEBRUCE, a/k/a "Dre,"
TERRANCE PATTON, a/k/a "T-Mac,"
CRAIG CALDWELL, a/k/a "CG,"
TIMOTHY BELIN, a/k/a "Cuz" and "Cuzzo,"
JENNIFER WORD, and
DENOMOIUS WELLS, a/k/a "Dinero"

UNDER SEAL

No. 24 CR 594

Violations: Title 21, United States Code,
Sections 841(a)(1) and 846; Title 18,
United States Code, Sections 922(g)(1)
and 924(c)(1)(A)

SUPERSEDING INDICTMENT

COUNT ONE

The SPECIAL JUNE 2024 GRAND JURY charges:

1. Beginning no later than on or about September 3, 2024, and continuing until at least on or about November 12, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ANDRE DEBRUCE, a/k/a "Dre,"
TERRANCE PATTON, a/k/a "T-Mac,"
CRAIG CALDWELL, a/k/a "CG,"
TIMOTHY BELIN, a/k/a "Cuz" and "Cuzzo,"
JENNIFER WORD, and
DENOMOIUS WELLS, a/k/a "Dinero,"

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, 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-piperindinyl] propanamide), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

2. With respect to DEBRUCE and PATTON, the offense involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance.

COUNT TWO

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about May 9, 2024, at Forest Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

TERRANCE PATTON, a/k/a “T-Mac,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about May 22, 2024, at Forest Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

TERRANCE PATTON, a/k/a “T-Mac,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about May 22, 2024, at Forest Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

TERRANCE PATTON, a/k/a “T-Mac,”

defendant herein, knowing that he had previously been convicted of a crime punishable by a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a black Taurus 9mm pistol, model G3C, bearing serial number ACK392941, which firearm had traveled in interstate commerce prior to the defendant’s possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about September 19, 2024, at Forest Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

TERRANCE PATTON, a/k/a “T-Mac,”

defendant herein, did knowingly and intentionally 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-piperindinyl] propanamide), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about September 19, 2024, at Maywood, in the Northern District of Illinois, Eastern Division, and elsewhere,

CRAIG CALDWELL, a/k/a “CG,”

defendant herein, did knowingly and intentionally 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 a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about September 19, 2024, at Maywood, in the Northern District of Illinois, Eastern Division, and elsewhere,

CRAIG CALDWELL, a/k/a "CG,"

defendant herein, did knowingly possess a firearm, namely, a loaded SCCY model CPX-1 9mm semi-automatic handgun, bearing serial number C303693, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Six of this Superseding Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT EIGHT

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about September 19, 2024, at Maywood, in the Northern District of Illinois, Eastern Division, and elsewhere,

CRAIG CALDWELL a/k/a "CG,"

defendant herein, knowing that he had previously been convicted of a crime punishable by a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a loaded SCCY model CPX-1 9mm semi-automatic handgun, bearing serial number C303693, which firearm had traveled in interstate commerce prior to the defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT NINE

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about September 27, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TERRANCE PATTON, a/k/a “T-Mac,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about September 27, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JENNIFER WORD and
DENOMOIUS WELLS, a/k/a “Dinero,”

defendants herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT ELEVEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about September 28, 2024, at Forest Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

TERRANCE PATTON a/k/a "T-Mac,"

defendant herein, knowing that he had previously been convicted of a crime punishable by a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a loaded Springfield Armory XD9, 9MM, semi-automatic pistol, bearing serial number XD869593, which firearm had traveled in interstate commerce prior to the defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWELVE

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about September 28, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

CRAIG CALDWELL a/k/a “CG,”

defendant herein, knowing that he had previously been convicted of a crime punishable by a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a loaded Springfield Armory XD9, 9MM semi-automatic pistol, bearing serial number XD869593, which firearm had traveled in interstate commerce prior to the defendant’s possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT THIRTEEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about November 12, 2024, at Forest Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

TERRANCE PATTON, a/k/a "T-Mac," and
ANDRE DEBRUCE, a/k/a "Dre,"

defendants herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

The SPECIAL JUNE 2024 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841 or 846, as set forth in this Superseding Indictment, defendants shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and to facilitate commission of the offense, as provided in Title 21, United States Code, Sections 853(a).

2. In addition, defendant shall forfeit to the United States of America, any firearm and ammunition:

a. involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c); and

b. found in the possession and under the immediate control of the defendant at the time of arrest, upon conviction of any offense for committing and attempting to commit any felony involving the use of threats, force, and violence, and perpetrated in whole or in part by the use of firearms, as provided in 18 U.S.C. § 3665.

3: The property to be forfeited includes, but is not limited to:

a. A personal money judgment;

b. a black Taurus 9mm pistol, model G3C, bearing serial number ACK392941, and any associated ammunition;

c. a SCCY model CPX-1 9 mm semi-automatic handgun, bearing serial number C303693, and any associated ammunition; and

d. a Springfield Armory XD9, 9MM, semi-automatic handgun bearing serial number XD869593, and associated ammunition.

4. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON _____

**ANDREW
ERSKINE**

Digitally signed by
ANDREW ERSKINE
Date: 2025.06.04
17:22:19 -05'00'

Signed by Andrew C. Erskine on behalf of the
UNITED STATES ATTORNEY