

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
) UNDER SEAL
 v.)
) No.
 RACHAD LUCAS,)
 also known as “LB” or “Baller”) Violations: 18 U.S.C. § 922(g)(1), 18
) U.S.C. § 924(c)(1)(A), 21 U.S.C.
) § 841(a)(1), 21 U.S.C. § 856(a)(2)

COUNT ONE

The SPECIAL JUNE 2018 GRAND JURY charges:

Beginning in or around January 31, 2017 and continuing until or about April 21, 2017, at Calumet City, in the Northern District of Illinois, Eastern Division, and elsewhere,

RACHAD LUCAS,
also known as “LB” or “Baller,”

defendant herein, did knowingly manage and control a place as a lessee, agent, and occupant, namely, a storage unit located at 2004 Dolton Avenue, Unit 1025, Calumet City, Illinois, and knowingly and intentionally rented, leased, profited from, and made available for use the place for the purpose of unlawfully manufacturing, storing, and distributing a controlled substance;

In violation of Title 21, United States Code, Section 856(a)(2).

COUNT TWO

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about April 21, 2017, at Calumet City, in the Northern District of Illinois,
Eastern Division,

RACHAD LUCAS,
also known as "LB" or "Baller,"

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 marijuana, a Schedule I Controlled Substance;

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

COUNT THREE

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about April 21, 2017, at Calumet City, in the Northern District of Illinois,
Eastern Division,

RACHAD LUCAS,
also known as “LB” or “Baller,”

defendant herein, did knowingly possess a firearm, namely a Glock, .45 caliber pistol, bearing serial number RMS779, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, maintaining a premises for the purpose of unlawfully manufacturing, storing, and distributing a controlled substance, in violation of Title 21, United States Code, Section 856(a)(2), as charged in Count One of this Indictment, and possession with intent to distribute a controlled substance, in violation of Title 21, United States Code Section 841(a)(1), as charged in Count Two of this Indictment;

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

COUNT FOUR

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about April 21, 2017, at Calumet City, in the Northern District of Illinois,
Eastern Division,

RACHAD LUCAS,
also known as “LB” or “Baller,”

defendant herein, having been previously 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 Glock, .45 caliber pistol, bearing serial number RMS779, which firearm had traveled in interstate and foreign commerce prior to defendant’s possession of the firearm;

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

FORFEITURE ALLEGATION

The SPECIAL JUNE 2018 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Section 856, and Title 21, United States Code, Section 841, as set forth in this Indictment, defendant shall forfeit to the United States of America 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, Section 853(a)(2).

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

3. The property to be forfeited includes, but is not limited to the following specific property: a Glock, .45 caliber pistol with serial number RMS779, and associated ammunition.

All pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY