

FILED

SEP 08 2020 *AC*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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

JUDGE DURKIN

UNITED STATES OF AMERICA

No. 20 CR 327

MAGISTRATE JUDGE VALDEZ

v.

KENDRICK PEPPER, and
LAMONT HAGGARD

Violations: Title 21, United States
Code, Sections 841(a)(1) and 846; and
Title 18, United States Code, Section 2

COUNT ONE

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

1. From on or about April 21, 2020 and continuing until on or about June 22, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KENDRICK PEPPER, and
LAMONT HAGGARD,

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, 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, 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 cocaine base, 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. Before defendant KENDRICK PEPPER committed the offense charged in Count One, KENDRICK PEPPER had a final conviction for a serious drug felony, namely, manufacture/delivery of heroin, in violation of 720 ILCS 570/407-B-1, in the Circuit Court of Cook County, Illinois, Docket No. 14 CR 919601, for which the defendant served a term of imprisonment of more than 12 months, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

3. Before defendant LAMONT HAGGARD committed the offense charged in Count One, LAMONT HAGGARD had a final conviction for a serious drug felony, namely, manufacture/delivery of heroin, in violation of 720 ILCS 570/401-C-1, in the Circuit Court of Cook County, Illinois, Docket No. 11 CR 0735902, for which the defendant served a term of imprisonment of more than 12 months, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT TWO

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about April 21, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KENDRICK PEPPER, and
LAMONT HAGGARD,

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 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, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

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

COUNT THREE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about April 23, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KENDRICK PEPPER, and
LAMONT HAGGARD,

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

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

COUNT FOUR

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about April 29, 2020, between approximately 9:25 a.m. and 9:27 a.m., at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KENDRICK PEPPER, and
LAMONT HAGGARD,

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 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, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

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

COUNT FIVE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about April 29, 2020, between approximately 3:17 p.m. and 3:34 p.m., at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LAMONT HAGGARD,

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

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

COUNT SIX

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about May 8, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KENDRICK PEPPER and
LAMONT HAGGARD,

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 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, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

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

A TRUE BILL

FOREPERSON

Signed by Timothy J. Storino on behalf of the
UNITED STATES ATTORNEY