

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ROY J. GRIFFIN and
DANIEL DOUGLAS

No.

Violations: Title 18, United States
Code, Section 659, and
Title 21, United States Code,
Section 841(a)(1)

UNDER SEAL

COUNT ONE

The SPECIAL AUGUST 2015 GRAND JURY charges:

1. At times material to this Indictment:

a. The National Railroad Passenger Corporation, also known as “Amtrak,” was an American passenger railroad service that provided passenger and freight train service in 46 states. Amtrak operated a commercial shipping service called “Amtrak Express.” Customers could ship small packages and freight under the size of a truckload via Amtrak Express between a number of locations where Amtrak provided passenger train service. Among other locations, Amtrak operated passenger train and Amtrak Express shipping services in Chicago, Illinois, and Los Angeles, California. Amtrak also provided passenger and shipping services between Los Angeles and Chicago.

b. Defendant ROY J. GRIFFIN was employed by Amtrak and worked at Amtrak’s facilities located in Union Station in Chicago.

2. On or about July 31, 2014, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROY J. GRIFFIN and
DANIEL DOUGLAS,

defendants herein, did steal and unlawfully take, carry away, and conceal from a railroad car, with intent to convert to their own use, goods and chattels, specifically, a package shipped on Amtrak Express from California to Individual A in Chicago and bearing waybill number CA1108096, moving as and which were a part of and constitute an interstate shipment of freight, express, and other property;

In violation of Title 18, United States Code, Sections 659 and 2.

COUNT TWO

The SPECIAL AUGUST 2015 GRAND JURY further charges:

On or about July 31, 2014, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

ROY J. GRIFFIN and
DANIEL DOUGLAS,

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.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY