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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

THOMAS G BRUTON  
CLERK, U S DISTRICT COURT

UNITED STATES OF AMERICA

v.

JOHNNY HERNDON,  
aka "Goo,"  
CHRISTOPHER HARRIS,  
JOHNATHAN GREEN,  
aka "Whiteboy" and "Whitey"  
FABIAN REDMOND,  
aka "Mook,"  
JOHN L. O'LEARY, IV,  
aka "JB,"  
ANTWAION EDWARDS,  
aka "Fee,"  
MARCUS LONGSTREET,  
aka "Chico,"  
MANUEL MEEKS,  
aka "Big Shorty,"  
CAURIECE HERNDON,  
aka "C" and "G,"  
DESHAWN RICHARDSON,  
aka "Lil Lord," "Shawn" and "D,"  
ANDREW JONES,  
aka "Crowbar,"  
PATRICIA NEAL,  
aka "Trish,"  
EDUARDO ZAMUDIO,  
aka "Lalo," and  
ROBERT RUSSELL,  
aka "Hurk"

Case No.: 14 CR 429

JUDGE DOW

MAGISTRATE JUDGE MASON

Violations:

Title 21, United States Code, Sections  
841(a)(1), 843(b), and 846; and Title 18,  
United States Code, Sections 922(g)(1)

COUNT ONE

The SPECIAL FEBRUARY 2014 GRAND JURY charges:

1. Beginning no later than in or about 2011, and continuing until on or about August 7, 2014, at Chicago, in the Northern District of Illinois, Eastern Division:

JOHNNY HERNDON,  
aka "Goo,"  
CHRISTOPHER HARRIS,  
JOHNATHAN GREEN,  
aka "Whiteboy" and "Whitey"  
FABIAN REDMOND,  
aka "Mook,"  
JOHN L. O'LEARY, IV,  
aka "JB,"  
ANTWAION EDWARDS,  
aka "Fee,"  
MARCUS LONGSTREET,  
aka "Chico,"  
MANUEL MEEKS,  
aka "Big Shorty,"  
CAURIECE HERNDON,  
aka "C" and "G,"  
DESHAWN RICHARDSON,  
aka "Lil Lord," "Shawn" and "D,"  
ANDREW JONES,  
aka "Crowbar,"  
PATRICIA NEAL,  
aka "Trish,"

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 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; and

2. With respect to JOHNNY HERNDON, aka "Goo," CHRISTOPHER HARRIS, JOHNATHAN GREEN, aka "Whiteboy" and "Whitey," FABIAN REDMOND, aka "Mook," JOHN L. O'LEARY, IV, aka "JB," and ANTWAION EDWARDS, aka "Fee," the offense involved 280 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance.

COUNT TWO

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about October 22, 2012, at Chicago, in the Northern District of Illinois,  
Eastern Division,

DESHAWN RICHARDSON,  
aka "Lil Lord, "Shawn" and "D,"

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 cocaine base, a Schedule II Controlled Substance;

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

**COUNT THREE**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about July 12, 2013, at Chicago, in the Northern District of Illinois,  
Eastern Division,

MARCUS LONGSTREET,  
aka "Chico,"

defendant herein, did knowingly and intentionally distribute a controlled substance,  
namely, 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).

**COUNT FOUR**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about October 8, 2013, at Chicago, in the Northern District of Illinois,  
Eastern Division,

CAURIECE HERNDON,  
aka "C" and "G,"

defendant herein, did knowingly and intentionally distribute a controlled substance,  
namely, 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).

**COUNT FIVE**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about October 24, 2013, at Chicago, in the Northern District of Illinois,  
Eastern Division,

JOHNATHAN GREEN,  
aka "Whiteboy" and "Whitey," and  
ANDREW JONES,  
aka "Crowbar,"

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 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, Sections 841(a)(1) and 2.

COUNT SIX

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about November 6, 2013, at Chicago, in the Northern District of Illinois, Eastern Division,

JOHNATHAN GREEN,  
aka "Whiteboy" and "Whitey,"  
ANDREW JONES,  
aka "Crowbar," and  
DESHAWN RICHARDSON,  
aka "Lil Lord," "Shawn," and "D,"

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 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, Sections 841(a)(1) and 2.



COUNT SEVEN

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about December 5, 2013, at Chicago, in the Northern District of Illinois, Eastern Division,

JOHNATHAN GREEN,  
aka "Whiteboy" and "Whitey," and  
DESHAWN RICHARDSON,  
aka "Lil Lord," "Shawn," and "D,"

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 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, Sections 841(a)(1) and 2.

**COUNT EIGHT**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about December 18, 2013, at Chicago, in the Northern District of Illinois, Eastern Division,

CHRISTOPHER HARRIS,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 28 grams or more 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).

COUNT NINE

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about December 27, 2013, at Chicago, in the Northern District of Illinois, Eastern Division,

ANDREW JONES,  
aka "Crowbar,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 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).

COUNT TEN

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about January 16, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

CHRISTOPHER HARRIS,

defendant herein, did knowingly and intentionally distribute a controlled substance,  
namely, 28 grams or more 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).

**COUNT ELEVEN**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about January 20, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

PATRICIA NEAL,  
aka "Trish,"

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 cocaine base, a Schedule II Controlled Substance;

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

COUNT TWELVE

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

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

CHRISTOPHER HARRIS,

defendant herein, did knowingly and intentionally distribute a controlled substance,  
namely, 28 grams or more 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).

**COUNT THIRTEEN**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about February 4, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

CHRISTOPHER HARRIS,

defendant herein, did knowingly and intentionally distribute a controlled substance,  
namely, 28 grams or more 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).

**COUNT FOURTEEN**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about February 4, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

MANUEL MEEKS,  
aka "Big Shorty,"

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 cocaine base, a Schedule II Controlled Substance;

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



**COUNT FIFTEEN**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about February 13, 2014, at Chicago, in the Northern District of Illinois, Eastern Division,

CHRISTOPHER HARRIS,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 28 grams or more 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).

**COUNT SIXTEEN**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about February 19, 2014, at Chicago, in the Northern District of Illinois, Eastern Division,

FABIAN REDMOND,  
aka "Mook," and  
ANDREW JONES,  
aka "Crowbar,"

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 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, Sections 841(a)(1) and 2.

**COUNT SEVENTEEN**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about March 6, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

**CHRISTOPHER HARRIS,**

defendant herein, did knowingly and intentionally distribute a controlled substance,  
namely, 28 grams or more 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).

**COUNT EIGHTEEN**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about March 24, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

ROBERT RUSSELL,  
aka "Hurk,"

defendant herein, did knowingly and intentionally possess with intent 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 NINETEEN

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about March 28, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

MARCUS LONGSTREET,  
aka "Chico,"

defendant herein, did knowingly and intentionally use a communication facility,  
namely, a cellular telephone, in committing and in causing and facilitating the  
commission of a felony violation of Title 21, United States Code, Section 841(a)(1),  
namely, conspiracy to distribute and possess with intent to distribute a controlled  
substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about March 29, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

CHRISTOPHER HARRIS,

defendant herein, did knowingly and intentionally distribute a controlled substance,  
namely, 28 grams or more 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).

COUNT TWENTY-ONE

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about April 4, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

CHRISTOPHER HARRIS,  
FABIAN REDMOND,  
aka "Mook," and  
ANDREW JONES,  
aka "Crowbar,"

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 base, a Schedule II Controlled Substance;

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

COUNT TWENTY-TWO

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about April 9, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

CHRISTOPHER HARRIS,  
JOHNATHAN GREEN,  
aka "Whiteboy" and "Whitey," and  
JOHN L. O'LEARY, IV,  
Aka "JB,"

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 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, Sections 841(a)(1) and 2.



**COUNT TWENTY-THREE**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about April 15, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

MANUEL MEEKS,  
aka "Big Shorty,"

defendant herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 841(a)(1), namely, conspiracy to distribute and possess with intent to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT TWENTY-FOUR**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about April 15, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

PATRICIA NEAL,  
aka "Trish,"

defendant herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 841(a)(1), namely, conspiracy to distribute and possess with intent to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT TWENTY-FIVE**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about April 24, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

MARCUS LONGSTREET,  
aka "Chico,"

defendant herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 841(a)(1), namely, conspiracy to distribute and possess with intent to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-SIX

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about April 25, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

MANUEL MEEKS,  
aka "Big Shorty,"

defendant herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 841(a)(1), namely, conspiracy to distribute and possess with intent to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT TWENTY-SEVEN**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about April 25, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

JOHN L. O'LEARY, IV,  
aka "JB," and  
CAURIECE HERNDON,  
aka "C" and "D,"

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 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, Sections 841(a)(1) and 2.

**COUNT TWENTY-EIGHT**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about April 26, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

FABIAN REDMOND,  
aka "Mook,"

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 cocaine base, a Schedule II Controlled Substance;

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

COUNT TWENTY-NINE

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about April 26, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

CHRISTOPHER HARRIS,  
JOHNATHAN GREEN,  
aka "Whiteboy" and "Whitey," and  
JOHN L. O'LEARY, IV,  
aka "JB,"

defendants herein, previously having been 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 Ruger .22 caliber Model MK-II semi-automatic pistol, bearing serial number 222-52408, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

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

**COUNT THIRTY**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about April 27, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

PATRICIA NEAL,  
aka "Trish,"

defendant herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 841(a)(1), namely, conspiracy to distribute and possess with intent to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).



**COUNT THIRTY-ONE**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about May 1, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

EDUARDO ZAMUDIO,  
aka "Lalo,"

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;

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

COUNT THIRTY-TWO

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about May 7, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

EDUARDO ZAMUDIO,  
aka "Lalo,"

defendant herein, did knowingly and intentionally distribute a controlled substance,  
namely, 100 grams or more of a mixture and substance containing a detectable  
amount of heroin, a Schedule I Controlled Substance;

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

**COUNT THIRTY-THREE**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about May 11, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

PATRICIA NEAL,  
aka "Trish,"

defendant herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 841(a)(1), namely, conspiracy to distribute and possess with intent to distribute a controlled substance, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT THIRTY-FOUR**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about May 13, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

EDUARDO ZAMUDIO,  
aka "Lalo,"

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;

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

**COUNT THIRTY-FIVE**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about May 15, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

FABIAN REDMOND,  
aka "Mook,"

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 cocaine base, a Schedule II Controlled Substance;

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

COUNT THIRTY-SIX

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about May 15, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

MARCUS LONGSTREET,  
aka "Chico,"  
JOHNATHAN GREEN,  
aka "Whiteboy" and "Whitey," and  
JOHN L. O'LEARY, IV,  
aka "JB,"

defendants herein, previously having been 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 CZ 9mm Model 27 .32 caliber semi-automatic pistol, bearing serial number 203702, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

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

**COUNT THIRTY-SEVEN**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about June 7, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

**CHRISTOPHER HARRIS,**

defendant herein, previously having been 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 loaded silver Rossi, Amadeo & Co. .357 caliber revolver bearing serial number F063110, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

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

**COUNT THIRTY-EIGHT**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about July 4, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

EDUARDO ZAMUDIO,  
aka "Lalo,"

defendant herein, did knowingly and intentionally 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).



**COUNT THIRTY-NINE**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about July 4, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

CHRISTOPHER HARRIS,

defendant 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, Sections 841(a)(1).

**COUNT FORTY**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about July 4, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

CHRISTOPHER HARRIS,

defendant herein, did knowingly and intentionally manufacture a controlled substance, namely, 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).

COUNT FORTY-ONE

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about July 4, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

CHRISTOPHER HARRIS,  
JOHNATHAN GREEN,  
aka "Whiteboy" and "Whitey," and  
DESHAWN RICHARDSON,  
aka "Lil Lord," "Shawn" and "D,"

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 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, Sections 841(a)(1) and 2.

**COUNT FORTY-TWO**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about July 5, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

MANUEL MEEKS,  
aka "Big Shorty,"

defendant herein, did knowingly and intentionally distribute a controlled substance,  
namely, 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).

**COUNT FORTY-THREE**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about July 6, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

CHRISTOPHER HARRIS,  
JOHNATHAN GREEN,  
aka "Whiteboy" and "Whitey,"  
DESHAWN RICHARDSON,  
aka "Lil Lord," "Shawn" and "D," and  
JOHN L. O'LEARY, IV,  
aka "JB,"

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 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, Sections 841(a)(1) and 2.

**COUNT FORTY-FOUR**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about July 9, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

CHRISTOPHER HARRIS,  
JOHNATHAN GREEN,  
ANTWAION EDWARDS,  
aka "Fee," and  
JOHN L. O'LEARY, IV,  
aka "JB,"

defendants herein, did knowingly and intentionally distribute a controlled  
substance, namely, 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, Sections 841(a)(1) and 2.

**COUNT FORTY-FIVE**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about July 16, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

ANTWAION EDWARDS,  
aka "Fee,"

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 cocaine base, a Schedule II Controlled Substance;

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

**COUNT FORTY-SIX**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about July 18, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

ANTWAION EDWARDS,  
aka "Fee,"

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 cocaine base, a Schedule II Controlled Substance;

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



**COUNT FORTY-SEVEN**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about July 24, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

ROBERT RUSSELL,  
aka "Hurk,"

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 FORTY-EIGHT**

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about August 7, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

**CHRISTOPHER HARRIS,**

defendant herein, previously having been 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 AMT .380 caliber Model Backup pistol, bearing serial number DA29458, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

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

COUNT FORTY-NINE

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about August 7, 2014, at Chicago, in the Northern District of Illinois,  
Eastern Division,

MARCUS LONGSTREET,  
aka "Chico,"

defendant herein, previously having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, ammunition, namely, 54 rounds of assorted ammunition, including Federal American Eagle .40 S&W 155 Grain Full Metal Jacket Pistol Cartridges (AE40R2) LOT NO P48X435, which ammunition had traveled in interstate commerce prior to defendant's possession of the ammunition;

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

**FORFEITURE ALLEGATION ONE**

The SPECIAL FEBRUARY 2014 GRAND JURY alleges:

1. The allegations of Counts 1 through 28, 30 through 35, and 38 through 47 are incorporated here for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of their violations of Title 21, United States Code, Sections 846, 841(a)(1) and 843(b), as alleged in Counts 1 through 28, 30 through 35, and 38 through 47 of this Indictment,

JOHNNY HERNDON,  
aka "Goo,"  
CHRISTOPHER HARRIS,  
JOHNATHAN GREEN,  
aka "Whiteboy" and "Whitey"  
FABIAN REDMOND,  
aka "Mook,"  
JOHN L. O'LEARY, IV,  
aka "JB,"  
ANTWAION EDWARDS,  
aka "Fee,"  
MARCUS LONGSTREET,  
aka "Chico,"  
MANUEL MEEKS,  
aka "Big Shorty,"  
CAURIECE HERNDON,  
aka "C" and "G,"  
DESHAWN RICHARDSON,  
aka "Lil Lord," "Shawn" and "D,"  
ANDREW JONES,  
aka "Crowbar,"  
PATRCIA NEAL,  
aka "Trish,"  
EDUARDO ZAMUDIO,  
aka "Lalo," and  
ROBERT RUSSELL,  
aka "Hurk,"

defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853(a)(1) and (2): (1) any and all property constituting, and derived from, any proceeds obtained, directly and indirectly, as a result of the violations; and (2) any and all property used, or intended to be used, to commit, or to facilitate the commission of, the violations.

3. The interests of defendants subject to forfeiture pursuant to Title 21, United States Code, Section 853 include, but are not limited to approximately \$8,600,000 and the following property:

- (a) funds in the amount of \$48,043 seized from Christopher Harris on or about August 7, 2014; and
- (b) funds in the amount of \$20,233 seized from Johnny Herndon on or about August 7, 2014.

4. If any of the property described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853(a), as a result of any act or omission of the defendants,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property belonging to the defendants under the provisions of Title 21, United States Code, Section 853(p), including but not limited to the following properties:

- a. the real property located at 716 S. Kostner, Chicago, Illinois, legally described as:

LOT 33 IN BLOCK 1 IN THE SUBDIVISION OF THAT PART OF THE EAST  $\frac{1}{2}$  OF THE SOUTHWEST  $\frac{1}{4}$  OF SECITON 15, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 16-15-307-040-0000;

- b. the real property located at 13250 S. Riverdale, Chicago, Illinois, legally described as:

LOT 9 EXCEPT THE NORTHERLY 25.1 FEET THEREOF) IN BLOCK 8 IN GOLDEN GATE SUBDIVISION BEING A SUBDIVISION OF PART OF THE EAST  $\frac{1}{2}$  OF THE NORTHWEST  $\frac{1}{4}$  OF SECTION 34, TOWNSHIP 37 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN IN COOK COUNTY, ILLINOIS.

PIN: 25-34-113-034-0000;

- c. the real property located at 7437 S. Eggleston Ave., Chicago, Illinois legally described as:

THE NORTH  $\frac{1}{2}$  OF LOT 8 IN BLOCK 2 IN AUBURN PARK SUBDIVISION IN SECTION 28, TOWNSHIP 38 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 20-28-125-009-0000;

- d. the real property located at 7200-7202 S. Indiana Ave. and 129-131 E. 72nd St., Chicago, Illinois legally described as:

LOTS 1 AND 2 IN BLOCK 6 IN D.B. SCULLY'S SUBDIVISION OF THE NORTHWEST  $\frac{1}{4}$  OF NORTHWEST  $\frac{1}{4}$  OF SECTION 27, TOWNSHIP 38 NORTH, RANGE 14, LYING EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 20-27-108-020-0000;

- e. the real property located at 6107-6111 S. St. Lawrence, Chicago, Illinois, legally described as:

THE NORTH 20 FEET OF LOT 22 AND THE SOUTH 40 FEET OF LOT 23 IN BLOCK 7 IN THE RESUBDIVISION OF THE WASHINGTON PARK CLUB ADDITION TO CHICAGO, A SUBDIVISION OF THE SOUTH  $\frac{1}{2}$  OF THE

SOUTHEAST  $\frac{1}{4}$  OF SECTION 15, TOWNSHIP 38 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 20-15-412-002-0000;

- f. the real property located at 5426-28 W. Harrison, Chicago, Illinois, legally described as:

LOTS 39, 40 AND THE EAST  $\frac{1}{2}$  OF LOT 41 IN DAVIS AND SON'S SUBDIVISION OF LOTS 113 AND 114 IN THE SCHOOL TRUSTEE'S SUBDIVISION OF THE NORTH PART OF SECTION 16, TOWNSHIP 39 NORTH, RANGE 12, EAST OF THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 16-16-121-039, 16-16-121-040 and 16-16-121-041;

- g. the real property located at 1309 E. 75th St. Apt. H, Chicago, Illinois, legally described as:

LOT 7, 8 AND THE WEST  $\frac{1}{2}$  OF LOT 6 (EXCEPT THE NORTH 91 FEET 8 INCHES AND EXCEPT THE SOUTH 19  $\frac{1}{2}$  FEET AND SAID LOTS IN BLOCK 40 IN CORNELL BEING A SUBDIVISION OF THE WEST  $\frac{1}{2}$  OF SECTION 26, THE SOUTHEAST  $\frac{1}{4}$  OF SECTION 16 (EXCEPT THE EAST  $\frac{1}{2}$  OF THE NORTHEAST  $\frac{1}{4}$  OF SAID SOUTHEAST  $\frac{1}{4}$ ; THE NORTH  $\frac{1}{2}$  OF THE NORTHWEST  $\frac{1}{4}$  OF THE SOUTH  $\frac{1}{2}$  OF THE NORTHWEST  $\frac{1}{4}$  OF THE SOUTH  $\frac{1}{2}$  OF THE NORTHWEST  $\frac{1}{4}$  LYING WEST OF THE ILLINOIS CENTRAL RAILROAD AND THE NORTHWEST  $\frac{1}{4}$  OF THE NORTHEAST  $\frac{1}{4}$  OF SECTION 16, TOWNSHIP 38 NORTH, RANGE 14, EAST OF THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS. ALSO, THE SOUTH 19  $\frac{1}{2}$  FEET (EXCEPT THE WEST 4 FEET 3 INCHES THEREOF) OF THE WEST  $\frac{1}{2}$  OF LOT 6 IN BLOCK 40 IN CORNELL AFORESAID.

PIN: 20-26-401-051-0000;

- h. the real property located at 110-114 N. Long, Chicago, Illinois, legally described as:

PARCEL ONE: THE SOUTH 23 FEET OF LOT 20 AND THE NORTH 10 FEET OF LOT 21 IN BLOCK 1 I HOLLEY AND SMITH'S SUBDIVISION OF THE EAST  $7\frac{1}{2}$  ACRES OF THE SOUTH  $43\frac{3}{4}$  ACRES OF THE WEST  $\frac{1}{2}$  OF THE SOUTH WEST  $\frac{1}{4}$  IN SECTION 9, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THIRD PRINCIPAL MERIDIAN PARCEL TWO: LOT 1 IN LARSEN'S SUBDIVISION OF THE SOUTH 15 FEET OF LOT 21 AND ALL OF LOTS 22 TO 26 INCLUSIVE IN BLOCK 1 OF HOLLEY AND SMITH'S SUBDIVISION OF THE EAST  $7\frac{1}{2}$  ACRES OF THE SOUTH  $43\frac{3}{4}$  ACRES OF THE WEST  $\frac{1}{2}$  OF THE SOUTH WEST  $\frac{1}{4}$  OF

SECTION 9, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 16-09-316-043-0000;

- i. the real property located at 2926 Nottingham, Markham, Illinois, legally described as:

LOT 35 IN BLOCK 2 IN CANTERBURY GARDENS UNIT NO. 1, BEING A SUBDIVISION OF PART OF THE NORTHWEST  $\frac{1}{4}$  OF SECTION 24, TOWNSHIP 36 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 28-24-102-054-0000;

- j. the real property located at 2436 W. Lithuanian Plaza Ct./2436 W. 69th St., Chicago, Illinois, legally described as:

LOT 20 IN BLOCK 2 IN ROBERT C. GIVENS SUBDIVISION OF THE SOUTH  $\frac{1}{2}$  OF THE NORTHEAST  $\frac{1}{4}$  OF THE SOUTHEAST  $\frac{1}{4}$  OF SECTION 24, TOWNSHIP 38 NORTH, RANGE 13, EAST OF THE PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 19-24-411-041-0000;

- k. the real property located at 14032 Lincoln, Dolton, Illinois, legally described as:

THAT PART OF LOT 7 AND THE SOUTHEASTERLY 40 FEET OF LOT 8, TAKEN AS A TRACT, IN BLOCK 1 IN DOLTON, LYING NORTHEASTERLY OF A LINE 115 FEET SOUTHWESTERLY AND PARALLEL TO THE NORTHEASTERLY LINE OF SAID LOTS IN THE EAST  $\frac{1}{2}$  OF THE EAST  $\frac{1}{2}$  OF THE NORTHWEST  $\frac{1}{4}$  OF SECTION 3, TOWNSHIP 36 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN IN COOK COUNTY, ILLINOIS.

PIN: 29-03-110-033-0000;

- l. the real property located at 4531 W. Jackson, Chicago, Illinois, legally described as:

LOT 13 IN BLOCK 2 IN COUNSELMAN'S SUBDIVISION OF THE NORTH  $\frac{1}{2}$  OF THE SOUTHEAST  $\frac{1}{4}$  OF THE NORTHWEST  $\frac{1}{4}$  OF SECTION 15, TOWNSHIP 39 NORTH, RANGE 13, (EXCEPT THE WEST 33 FEET THEREOF), EAST OF THE THIRD PRINCIPAL MERIDIAN IN COOK COUNTY, ILLINOIS.



PIN: 16-15-119-004-0000;

- m. the real property located at 1315 Ellsworth Pl., Gary, Indiana, legally described as:

THE NORTH 5 FEET OF LOT 42, BLOCK 3, ALL OF LOT 43, BLOCK 3 AND THE SOUTH 5 FEET OF LOT 44, BLOCK 3, SOUTH BEND AND GARY LAND COMPANY'S SUBDIVISION IN THE CITY OF GARY, AS SHOWN IN PLAT BOOK 8, PAGE 12 IN THE OFFICE OF THE RECORDER OF LAKE COUNTY, INDIANA.

PNN: 25-47-0057-0046;

- n. the real property located at 1125 Pierce St., Gary, Indiana, legally described as:

LOT 43, IN BLOCK 5, IN GARY LAND COMPANY'S ELEVENTH SUBDIVISION IN THE CITY OF GARY, AS SHOWN IN PLAT BOOK 13, PAGE 25, LAKE COUNTY, INDIANA.

PNN: 25-44-0297-0045;

- o. the real property located at 1308 Ellsworth Pl., Gary, Indiana, legally described as:

THE SOUTH 15 FEET OF LOT NUMBERED 2 AND NORTH 20 FEET OF LOT 3, IN BLOCK 4 AS SHOWN ON THE RECORDED PLAT OF SOUTH BEND OF GARY LAND'S COMPANY'S SUBDIVISION, IN THE CITY OF GARY, AS PER PLAT THEREOF, RECORDED IN PLAT BOOK 8, PAGE 12, IN THE OFFICE OF THE RECORDER OF LAKE COUNTY, INDIANA.

PNN: 25-47-0058-0002;

- p. the real property located at 1316 Ellsworth Pl., Gary Indiana, legally described as:

THE SOUTH 5 FEET OF LOT 3, ALL OF LOT 4 AND THE NORTH 5 FEET OF LOT 5, IN BLOCK 4, IN THE SOUTH BEND AND GARY LAND'S COMPANY'S SUBDIVISION, IN THE CITY OF GARY, AS PER PLAT THEREOF, RECORDED IN PLAT BOOK 8, PAGE 12, IN THE OFFICE OF THE RECORDER OF LAKE COUNTY, INDIANA.

PNN: 25-47-0058-0003;

- q. the real property located at 5030 W. Erie, Chicago, Illinois, legally described as:

LOT 4 IN THE RESUBDIVISION OF LOTS 84 TO 88 BOTH INCLUSIVE IN THE SUBDIVISION OF THE NORTH  $\frac{1}{2}$  OF THE EAST  $\frac{1}{2}$  OF THE WEST  $\frac{1}{2}$  OF THE NORTHEAST  $\frac{1}{4}$  OF SECTION 9, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN (EXCEPT THE NORTH 379.75 FEET THEREOF) IN COOK COUNTY, ILLINOIS.

PIN: 16-09-210-030-0000;

- r. the real property located at 423 N. Leamington, Chicago, Illinois, legally described as:

THE NORTH 1 FOOT OF LOT 31, ALL OF LOT 32 AND LOT 33 (EXCEPT THE NORTH 19 FEET) IN BLOCK 4 IN WALLER'S SUBDIVISION OF THE WEST  $\frac{1}{2}$  OF THE WEST  $\frac{1}{2}$  OF THE NORTHEAST  $\frac{1}{4}$  (EXCEPT THE NORTH 22 ACRES) OF SECTION 9, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 16-09-225-009-0000;

- s. the real property located at 5718 S. Hoyne, Chicago, Illinois, legally described as:

THE NORTH 13 FEET OF LOT 47 AND THE SOUTH 17 FEET OF LOT 48 IN BLOCK 11 IN DEWEY'S SUBDIVISION OF PART OF THE EAST  $\frac{1}{2}$  OF THE NORTHWEST  $\frac{1}{4}$  OF SECTION 18, TOWNSHIP 38 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 20-18-116-023-0000;

- t. the real property located at 4901 W. Erie, Chicago, Illinois, legally described as:

LOT 1 IN THE SUBDIVISION OF LOTS 1 TO 4 IN BLOCK 11 IN GEORGE C. CAMPBELL'S SUBDIVISION OF THE NORTHEAST  $\frac{1}{4}$  OF THE NORTHEAST  $\frac{1}{4}$  OF SECTION 9, AND THE SOUTH  $\frac{1}{2}$  OF THE SOUTHEAST  $\frac{1}{4}$  OF THE SOUTHEAST  $\frac{1}{4}$  OF SECTION 4, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 16-09-214-019-0000;

- u. the real property located at 3918 Adams St., Bellwood, Illinois, legally described as:

LOT 177 IN MADISON STREET WESTCHESTER "L" SUBDIVISION IN THE NORTHWEST  $\frac{1}{4}$  OF THE NORTHWEST  $\frac{1}{4}$  OF SECTION 16, TOWNSHIP 39 NORTH, RANGE 12, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 15-16-108-017-0000;

- v. the real property located at 1443 S. Komensky, Chicago, Illinois, legally described as:

LOT 20 IN BLOCK 1 IN OUR HOME ADDITION TO CHICAGO, BEING A SUBDIVISION OF THE EAST  $\frac{1}{2}$  OF THE NORTHEAST  $\frac{1}{4}$  OF SECTION 22, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN (EXCEPT THE NORTH 50 ACRES THEREOF) IN COOK COUNTY, ILLINOIS.

PIN: 16-22-222-017-0000;

- w. the real property located at 4216 W. Gladys, Chicago, Illinois, legally described as:

LOT 18 IN A.F. DORENU'S SUBDIVISION OF LOT 2 IN THE COMMISSIONER'S PARTITION OF THE EAST  $\frac{1}{2}$  OF THE SOUTHWEST  $\frac{1}{4}$  OF THE NORTHEAST  $\frac{1}{4}$  OF SECTION 15, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN IN COOK COUNTY, ILLINOIS.

PIN: 16-15-217-039-0000;

- x. the real property located at 4539 W. Jackson, Chicago, Illinois, legally described as:

LOT 19 IN BLOCK 1 (EXCEPT THAT PORTION OF LOT 19, IF ANY, UPON WHICH THE BUILDING TO THE EAST OF SAID LOT IS LOCATED) IN BOYNTON'S SUBDIVISION OF THE WEST  $\frac{1}{2}$  OF THE WEST  $\frac{1}{2}$  OF THE NORTHEAST  $\frac{1}{4}$  OF THE NORTHWEST  $\frac{1}{4}$  (EXCEPT THE WEST 33 FEET THEREOF) IN SECTION 15, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN IN COOK COUNTY, ILLINOIS.

PIN: 16-15-119-001-0000;

- y. the real property located at 4538 W. Jackson, Chicago, Illinois, legally described as:

LOT 21 IN BLOCK 1 IN BOYNTON'S SUBDIVISION OF THE WEST ½ OF THE WEST ½ OF THE NORTHEAST ¼ OF THE NORTHWEST ¼ (EXCEPT THE WEST 33 FEET) IN SECTION 15, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN IN COOK COUNTY, ILLINOIS.

PIN: 16-15-114-019-0000;

- z. the real property located at 4537-4539 W. Congress Parkway, Chicago, Illinois, legally described as:

LOTS 22 AND 23 IN BLOCK 4 IN COUSELMAN'S SUBDIVISION OF THE SOUTH ½ OF THE SOUTHEAST ¼ OF THE NORTHWEST ¼ OF SECTION 15, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 16-15-131-032-0000.

- aa. the real property located at 247 S. 19<sup>th</sup> Avenue, Maywood, Illinois, legally described as:

LOTS 23 AND 24 IN BLOCK 24 IN PROVISO LAND ASSOCIATION ADDITION TO MAYWOOD IN SECTION 10, TOWNSHIP 39 NORTH, RANGE 12, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PIN: 15-10-306-017; and

- bb. the real property located at 4542 W. Jackson, Chicago, Illinois, legally described as:

LOT 19 IN BLOCK 1 (EXCEPT THAT PORTION OF LOT 19, IF ANY, UPON WHICH THE BUILDING TO THE EAST OF SAID LOT IS LOCATED) IN BOYNTON'S SUBDIVISION OF THE WEST ½ OF THE WEST ½ OF THE NORTHEAST ¼ OF THE NORTHWEST ¼ (EXCEPT THE WEST 33 FEET THEREOF) IN SECTION 15, TOWNSHIP 39 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN IN COOK COUNTY, ILLINOIS.

PIN: 16-15-114-017-0000.

All pursuant to Title 21, United States Code, Section 853.

**FORFEITURE ALLEGATION TWO**

1. The allegations of Counts 29, 36, 37, 48, and 49 of this Indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of their violations of Title 18, United States Code, Section 922(g)(1), as alleged in Counts 29, 36, 37, 48, and 49 of this Indictment,

CHRISTOPHER HARRIS,  
JOHNATHAN GREEN,  
aka "Whiteboy" and "Whitey,"  
JOHN L. O'LEARY, IV,  
aka "JB," and  
MARCUS LONGSTREET,  
aka "Chico,"

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any and all property used, or intended to be used, to commit, or to facilitate the commission of, the violations.

3. The interests of defendants subject to forfeiture pursuant to Title 21, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), include, but are not limited to the following:

- a. a Ruger .22 caliber Model MK-II semi-automatic pistol, bearing serial number 222-52408;
- b. a CZ 9mm Model 27 .32 caliber semi-automatic pistol, bearing serial number 203702;
- c. a loaded silver Rossi, Amadeo & Co. .357 caliber revolver bearing serial number F063110;

- d. AMT .380 caliber Model Backup pistol, bearing serial number DA29458; and
- e. 54 rounds of assorted ammunition, including Federal American Eagle .40 S&W 155 Grain Full Metal Jacket Pistol Cartridges (AE40R2) LOT NO P48X435.

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

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY