

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

JOSE URIOSTEGUI,
aka "PUPPET," and
CHRISTOPHER LEWIS,
aka "GOTTI"

CASE NUMBER

UNDER SEAL

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

On or about February 13, 2008, in Cook County, and elsewhere, in the Northern District of Illinois, and elsewhere, defendants,

knowingly and intentionally conspired to possess with intent to distribute and to distribute 50 grams or more of mixtures and substances containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance,

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

I further state that I am a(n) Special Agent, FBI, and that this complaint is based on the following facts:
Official Title

See Attached Affidavit.

Continued on the attached sheet and made a part hereof: X Yes No

Signature of Complainant

Sworn to before me and subscribed in my presence,

September 22, 2008
Date

at Chicago, Illinois
City and State

Magistrate Judge Maria Valdez
Name & Title of Judicial Officer

Signature of Judicial Officer

STATE OF ILLINOIS)
)
COUNTY OF COOK)

AFFIDAVIT

I. INTRODUCTION

I, Rashead J. Williams, being duly sworn, state as follows:

1. I am a Special Agent employed with the Federal Bureau of Investigation (“FBI”), United States Department of Justice. I have been employed by FBI as a Special Agent for over five years. I have been assigned to the Joint Task Force on Gangs, Chicago Field Division for the past sixteen months. Prior to that, I was assigned to the Southern New Mexico Gang Task Force for approximately three years. As part of my official duties, I investigate criminal violations of the federal narcotics laws, including, but not limited to, Title 21, United States Code, Sections 841, 843 and 846. I have received specialized training in the enforcement of laws concerning controlled substances and gang-related activities. I have been involved in various aspects of both physical and electronic surveillance, analysis of documentary and physical evidence, in the debriefing of defendants, witnesses, and informants, as well as others who have knowledge of the distribution of controlled substances.

2. The following information is based on my personal observations, knowledge and information I received from other Federal Law Enforcement Officers, the Chicago Police Department (“CPD”), as well as from cooperating witnesses who have proven reliable and have provided information which has been independently corroborated, as set forth in part

herein.

3. My understanding and interpretation of conversations set forth in this affidavit are based on my knowledge of the investigation to date, the context of the conversations, consensual audio and video recordings made in this investigation, my training and experience, conversations I have had with other agents and officers experienced in narcotics and gang investigations, and on information provided by a cooperating individual in this investigation.

4. Because this affidavit is being submitted for the limited purpose of establishing probable cause to support a criminal complaint charging JOSE URIOSTEGUI, also known as (“aka”) “PUPPET” (hereinafter referred to as “URIOSTEGUI”) and CHRISTOPHER LEWIS, aka “GOTTI,” with a violation of Title 21, United States Code, Section 846, it does not contain all the information known to law enforcement concerning this investigation.

II. BACKGROUND

5. This is an investigation involving unlawful activities engaged in by members and affiliates of the Latin Kings street gang, including the distribution of crack cocaine. As part of this investigation, law enforcement has worked with several cooperating witnesses, including Cooperating Witness 1 (“CW1”).¹

¹ CW1 has been a member of the 30th and Sawyer Section of the 26th Street Region of the Latin Kings since 1993 and most recently held the position as the “Supreme Regional Enforcer” of the Almighty Latin King Nation (“ALKN”) for the Southside of Chicago. Between August 2007 and January 2008, CW1 held the position of a 26th Street Region “Nation Enforcer.” CW1 has been providing reliable, timely information to the FBI since May 2007. Since that time, FBI agents and CPD Officers have spoken to CW1 in person, or telephonically, on numerous occasions. A substantial portion of CW1’s information regarding the Latin Kings has been corroborated by

JOSE URIOSTEGUI, aka "PUPPET"

6. According to CW1, CW1 met URIOSTEGUI in November 2007. During consensually-recorded conversations with CW1, URIOSTEGUI identified himself to CW1 as the Inca of the 57th and Cicero Section of the Latin Kings street gang and stated that URIOSTEGUI has held that position since October 2007. Specifically, on or about February 13, 2008, in a recorded conversation, URIOSTEGUI identified himself to CW1 as an Inca. URIOSTEGUI stated, "Yeah, this is all our shit right here dog. Austin to Monitor, Monitor to fucken all the way by the tracks, and all the way by the tracks to where fucken, where Austin where you get on the highway at. That's all our shit." URIOSTEGUI also stated, "I just turned Inca dog. I just turned, I've been Inca since fucken October."

independent investigation that includes physical surveillance, interviews of Latin King street gang members in the Little Village area, telephone record analysis, other cooperating witnesses, and CW1's participation in several consensually monitored telephone and non-telephonic conversations with subjects and targets of this investigation.

CW1 has agreed to cooperate with the government thinking that the government may be investigating him/her. Affiant is aware of no additional criminal charges pending against CW1 at this time. CW1 has been arrested over ten times for offenses which include narcotics offenses, firearms offenses, home invasion, and armed robbery. CW1 has two felony convictions. In 1999, CW1 was convicted of a firearms offense and was sentenced to a term of imprisonment and probation. In 2004, CW1 was convicted of possession of a controlled substance and sentenced to a term of probation. CW1 has received payment in the amount of \$42,800 from the FBI for services and \$78,401.30 for expenses incurred (in large measure for relocation expenses for CW1 and multiple family members) in conjunction with this and other criminal matters under investigation by either the FBI or the CPD.

CHRISTOPHER LEWIS, aka "GOTTI"

7. CHRISTOPHER LEWIS is a member of the 57th and Cicero Section of the Latin Kings street gang as reported by URIOSTEGUI during a consensually monitored and recorded conversation. CW1 first met CHRISTOPHER LEWIS during the February 13, 2008 drug transaction as further described below.

III. PROBABLE CAUSE

8. On or about February 13, 2008, law enforcement showed CW1 several CPD photographs, one of which CW1 identified as the individual known to CW1 as "Puppet" or "Jose Uriogosi" and residing at 855 North Drake St, Chicago, Illinois. The photograph was of URIOSTEGUI and appears to Affiant to be the same individual captured in video-recorded meetings with CW1.

9. On or about February 7, 2008, CW1 placed a consensually recorded telephone call to URIOSTEGUI. CW1 recognized URIOSTEGUI's voice from prior conversations. During this call, CW1 and URIOSTEGUI planned a meeting where URIOSTEGUI would provide CW1 with three ounces of crack cocaine. CW1 stated, "You got those three onions (ounces of crack cocaine) or what?"² URIOSTEGUI explained that he would need to first

² The recorded conversations throughout this Affidavit have been summarized, and parentheses have been placed around language that represent my or other agents' understanding of what is being said during the recordings, based on the contents and context of the conversations, my experience as a law enforcement officer, and the experience of other law enforcement officers in this investigation, and information provided by CW1. In addition, language that is quoted from the recorded conversations throughout this Affidavit is based upon law enforcement's review of the recorded conversations. Quoted material is not intended to be a final transcription of the audio recordings from which the quotes are taken.

call another person in order to obtain the drugs and then setup a meeting to orchestrate the drug transaction. During the same conversation, CW1 stated, "I need some crack to crack your back!" URIOSTEGUI responded, "For sure, don't even trip, King." As a result of the conversations with URIOSTEGUI, CW1 agreed to wear concealed recording devices and a transmitter and meet with URIOSTEGUI in an effort to purchase crack cocaine from URIOSTEGUI.

10. On or about February 13, 2008, CW1 agreed to meet with URIOSTEGUI. Before meeting with URIOSTEGUI, law enforcement searched CW1 and CW1's vehicle for the presence of money, firearms, and narcotics. This search was negative. In addition, law enforcement equipped CW1 with concealed video and audio recording devices and a transmitter device, and provided CW1 with \$2,250 in purchase money. Law enforcement conducting surveillance ("surveillance") saw CW1 drive to the vicinity of 855 North Drake, Chicago, Illinois to meet with URIOSTEGUI.

11. During the recorded meeting, CW1 provided URIOSTEGUI with \$2,250 in cash, to pay for the three ounces of crack cocaine. The agreed upon price was \$750 per ounce. CW1 asked URIOSTEGUI, among other things, "How Much? \$2,250?" URIOSTEGUI replied, "Yeah." Later in the conversation, CW1 asked URIOSTEGUI, "How much?" and URIOSTEGUI replied, "\$2,250." Later in the conversation, URIOSTEGUI directed CW1 to travel to a Jiffy Lube located at 215 S. Harlem Avenue, Oak Park, Illinois, to meet with CHRISTOPHER LEWIS aka "GOTTI".

12. Surveillance saw URIOSTEGUI and CW1 travel together to the Jiffy Lube in

CW1's vehicle. Once at that location, "GOTTI" got into CW1's vehicle. CW1 was later shown several CPD photographs, one of which CW1 identified as the individual known to CW1 as "GOTTI." This photograph depicted to CHRISTOPHER LEWIS and appears to Affiant to be the same individual captured in a video-recorded meeting with CW1. LEWIS directed CW1 to park the vehicle near the intersection of Mason Avenue and Filmore Avenue, Chicago, Illinois. Once at that location, CHRISTOPHER LEWIS exited the vehicle. Surveillance saw CHRISTOPHER LEWIS exit the vehicle and meet with an unknown individual wearing a white hooded sweatshirt. While CHRISTOPHER LEWIS was gone, CW1 asked URIOSTEGUI, "Did you give him the money?" URIOSTEGUI replied, "Naw, I'll check...I'll check him out real quick." CW1 then asked URIOSTEGUI, "Do you trust this guy?" URIOSTEGUI replied, "Yeah, he's one of my good nigga's, he's a good nigga dog." URIOSTEGUI then explained to CW1 that CHRISTOPHER LEWIS was in charge of the gang activity in the area. URIOSTEGUI stated, "This is all our shit...from Austin to Monitor, Monitor fuckin' to all the way by the tracks."

13. Shortly thereafter, at approximately 11:14 am, surveillance saw CHRISTOPHER LEWIS return to the vehicle. When CHRISTOPHER LEWIS returned to the passenger-side of the vehicle, law enforcement observed URIOSTEGUI open the door. When CHRISTOPHER LEWIS returned, URIOSTEGUI handed CHRISTOPHER LEWIS the \$2,250 in cash. URIOSTEGUI told CHRISTOPHER LEWIS, "That's \$2250." CHRISTOPHER LEWIS asked, "That's 250?" URIOSTEGUI and CW1 both responded, "That's \$2250!"

14. CHRISTOPHER LEWIS then departed with the cash. Surveillance saw CHRISTOPHER LEWIS walk into an adjacent alley for a short period of time. Minutes later, at approximately 11:21 am, CHRISTOPHER LEWIS returned to CW1's vehicle and provided CW1 with three ounces of crack cocaine. CW1 asked CHRISTOPHER LEWIS if it was three ounces and CHRISTOPHER LEWIS stated, "That's three zones...go weigh it out." URIOSTEGUI added, "Three zones, weigh it." CW1 also asked, "This is crack, right?" URIOSTEGUI replied, "Yeah, that's crack," and CHRISTOPHER LEWIS stated, "Watch, I'm going to open it up, let me show you." CW1 gave the suspected crack cocaine back to CHRISTOPHER LEWIS and CHRISTOPHER LEWIS opened the plastic wrapping to show CW1 the quality of the suspected crack cocaine. CW1 stated, "Looks like re-rock." CHRISTOPHER LEWIS replied, "It looks like re-rock but it's not re-rock. There's a clucker right there if you want him to sample that shit for you." CW1 then drove back to the abovementioned Jiffy Lube and dropped off CHRISTOPHER LEWIS and URIOSTEGUI.

15. CW1 then drove to a predetermined location and met with law enforcement to turn over the drug evidence. In addition, law enforcement searched CW1 for money with negative results. The drug evidence, which appeared to law enforcement agents to have the characteristics of crack cocaine, was received by law enforcement and was later submitted to a Drug Enforcement Administration ("DEA") laboratory for analysis. DEA laboratory tests on the suspected crack cocaine obtained from CHRISTOPHER LEWIS confirmed the presence of sodium bicarbonate and cocaine base with a net weight of 81.9 grams.

16. Based on the foregoing, I believe that probable cause exists that JOSE

URIOSTEGUI, aka "PUPPET," and CHRISTOPHER LEWIS, aka "GOTTI," violated Title 21, United States Code, Section 846, in that they conspired with each other to distribute a controlled substance, namely, in excess of 50 grams of mixtures containing cocaine base, commonly known as "crack cocaine," a Schedule II Narcotic Drug Controlled Substance.

FURTHER AFFIANT SAYETH NOT.

RASHEAD J. WILLIAMS, Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO
this ___ day of September 2008.

HON. MARIA VALDEZ
United States Magistrate Judge