
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER:

LORENZO TRUJILLO

UNDER SEAL

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief: On or about December 22, 2011, in the Northern District of Illinois, Eastern Division and elsewhere, LORENZO TRUJILLO, defendant herein:

did knowingly and intentionally conspire to 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, Section 841(a)(1),

in violation of Title 21, United States Code, Section 846. I further state that I am a Special Agent with the Drug Enforcement Administration, and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.

Signature of Complainant
MICHAEL J. STONE
Special Agent, Drug Enforcement Administration

Sworn to before me and subscribed in my presence,

September 18, 2012 at Chicago, Illinois
Date City and State

MARIA VALDEZ, U.S. Magistrate Judge
Name & Title of Judicial Officer

Signature of Judicial Officer

conversations; (f) physical surveillance conducted by law enforcement agents and officers, which I have either participated in or has been reported to me either directly or indirectly; (g) my review and analyses of telephone toll records, pen register and trap and trace data and cell site information; (h) my review of information derived from law enforcement and commercial database records; (i) my review of information derived from criminal history records maintained by the Chicago Police Department, Illinois State Police and National Crime Information Center; (j) my review of drivers' license and automobile registration records from various states, including records of the Illinois Secretary of State; (k) my review of information provided by cooperating sources, witnesses and other individuals; and (l) laboratory analysis reports.

3. This affidavit is submitted in support of a criminal complaint alleging that on or about December 22, 2011, LORENZO TRUJILLO did knowingly and intentionally conspire to possess with intent to distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(a)(1), all in violation of Title 21, United States Code, Section 846. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that TRUJILLO committed the offenses alleged in the complaint.

II. Background

4. Beginning in 2010, DEA agents have received information from a confidential source (“CS-1”)¹ regarding the drug trafficking and money laundering activities of a Mexican based drug trafficking organization (“the DTO”). According to CS-1, since at least 2010 until on or about July 2012,² a high ranking member of the DTO who was located in Mexico (the “Mexican SOS”) oversaw, on behalf of the DTO, the distribution of large quantities of cocaine and heroin and the collection of large quantities of drug proceeds in multiple locations in the United States, including Chicago, Illinois, Atlanta, Georgia and elsewhere.

5. According to CS-1, in 2011, the Mexican SOS contacted CS-1 and asked CS-1 to further drug trafficking and money laundering operations on behalf of the DTO in the Chicago area. The Mexican SOS advised that CS-1 would be responsible for the collection, counting and disbursement of monies derived from the sale of cocaine by the DTO in Chicago. CS-1 agreed and worked for the DTO in Chicago, while under the supervision of DEA, from approximately December 2011 to January 2012.

6. As set forth in greater detail below, the information provided by CS-1 has been corroborated by independent investigation, including physical surveillance, consensually recorded telephone calls and text messages, meetings between CS-1 and members of the DTO, including TRUJILLO, controlled narcotics transactions with members of the DTO, including TRUJILLO, and field and laboratory tests indicating the presence of cocaine.

¹ According to a criminal history database check, CS-1 has no prior arrests or convictions. CS-1 is currently cooperating with DEA for monetary compensation. To date, CS-1 has been paid approximately \$23,000.

² According to CS-1 and Mexican media sources, in approximately July 2012, the Mexican SOS was killed in Mexico.

7. At various times between December 6, 2011 and February, 2012, DEA intercepted all consensual wire and electronic communications over Subject Phone 1, Subject Phone 2, Subject Phone 3 and Subject Phone 5, all of which were used by CS-1, pursuant to interception orders signed by the Chief Judge or Acting Chief Judge for the United States District Court for the Northern District of Illinois.³

8. As set forth in further detail below, based on: (a) the court authorized consensually intercepted telephone calls and electronic communications, (b) physical surveillance, (c) analysis of pen register and trap and trace data, (d) analysis of information provided by CS-1, (e) meetings between TRUJILLO and CS-1, (f) a controlled cocaine transaction with TRUJILLO on December 21, 2011, (g) a meeting with CS-1 on December 23, 2011, during which TRUJILLO provided narcotics proceeds to CS-1, and (h) a meeting on December 31, 2011, during which TRUJILLO provided narcotics proceeds to CS-1, DEA agents identified TRUJILLO as a narcotics distributor and money courier in the United States for the DTO.

³ The call summaries in this affidavit that include a “session” number refer to telephone calls that were intercepted pursuant to one of the above-referenced court orders.

III. Facts Establishing Probable Cause

9. In summary, TRUJILLO⁴, after a series of consensually recorded telephone calls, obtained one kilogram of cocaine from CS-1 on December 22, 2011, under the direction and control of the DEA. Subsequent to the December 22 transaction, TRUJILLO arranged to deliver the proceeds from the cocaine sales to CS-1 on December 23 and December 31, 2011, which were then turned over to DEA.

A. TRUJILLO Obtained One Kilogram of Cocaine from CS-1 on December 22, 2011

10. On December 21, 2011, at approximately 1:34 p.m., CS-1 received a call on Subject Phone 3 from the Mexican SOS using push to talk number 92*784XXXXX (hereinafter, “the Mexican SOS Phone 1”) (Call # 244).⁵ During the call, the Mexican SOS said, “[Individual A] will

⁴ The identification of TRUJILLO and TRUJILLO’s voice in this Affidavit is based on the following: First, surveillance agents observed TRUJILLO meet with CS-1 in person on December 22, December 23, and December 31, 2011. Agents compared a booking photograph of TRUJILLO to the individual they observed on December 22, December 23, and December 31, 2011, and determined that TRUJILLO was the person that met with CS-1. Second, CS-1 identified a photograph of TRUJILLO following CS-1’s meetings with TRUJILLO on December 22, December 23, and December 31, 2011. Third, CS-1 compared the voice on the recorded telephone conversations between CS-1 and TRUJILLO described in this affidavit to the in-person conversation with TRUJILLO and determined they were the same voice. Third, during recorded conversations, TRUJILLO arranged to personally meet with CS-1 to complete narcotics and currency transactions on December 22, December 23 and December 31, 2011, and subsequently met with CS-1 on those dates.

⁵ Some of the consensually-recorded and intercepted conversations (hereinafter “recorded conversations”) have been summarized in this Affidavit. The language that is quoted from the recorded conversations throughout this Affidavit is based upon a preliminary review of the recorded conversations, and not on final transcripts of the recorded conversations. The times listed for the recorded conversations are approximate. The summaries do not include all statements or topics covered during the course of the recorded conversations. At various points in the Affidavit I have included in brackets my interpretation of words and phrases used in the recorded conversations. My interpretations are based on information received from CS-1, the contents and context of the recorded conversations, events occurring before and after the conversations, my knowledge of the investigation as a whole, my experience and training, and the experience and training of other law enforcement agents in this investigation. Unless otherwise noted, the intercepted conversations contained herein are all in the Spanish language. For these interceptions, I have at time relied on draft - not final - English translations of conversations in Spanish done by DEA agents and/or interpreters contracted

be going right now. He's going to pick up a file [kilogram of cocaine] right now. He's going to pick up a file [kilogram of cocaine] and he'll give you the application of the file [payment for the cocaine], right now." CS-1 stated, "Okay, so only one file? All set. Do you know the application number [price for the cocaine]?" The Mexican SOS said, "It's document zero, twenty-six [\$26,000]."

11. At approximately 6:23 p.m., CS-1 received a call on Subject Phone 3 from Individual A using push to talk telephone number 62*11*XXXXX (hereinafter "Individual A Phone 1") (Call #251). During the call, Individual A stated, "I'm going to give you the number of a guy, his name is Lorenzo. He's going to go see you in the morning." CS-1 stated, "He's going to come see me, around what time?" Individual A said, "Early, what's the earliest they can go." CS-1 told Individual A that the earliest was around 8 a.m. Individual A stated, "Well, they can do it early, very early, but you're saying 8:00 and I like it more around 5:00 or 6:00."

12. At approximately 8:26 p.m., CS-1 received a call on Subject Phone 3 using Individual A Phone 1 (Call#258). During the call, Individual A said, "Hey, my son is Lorenzo [TRUJILLO], he's going to call you in the morning between 5:45 and 6:00 so you said Foster and what else?" CS-1 provided the address to his/her residence.

13. On December 22, 2011, at approximately 4:10 a.m., DEA agents met with CS-1. DEA agents provided CS-1 with three separately packaged kilograms of cocaine⁶ in a Hollister shopping bag. DEA agents searched CS-1 for any other contraband or excess money with negative

by DEA. Italicized words appearing in such summaries were spoken in English.

⁶ On December 21, 2011, Individual B supplied CS-1 with three rectangular-shaped packages wrapped in black tape and covered in a greasy substance. The packages contained a white, powdery substance, which later field tested positive for the presence of cocaine. DEA took custody of the three packages of cocaine.

results.

14. Later that day, at approximately 6:02 a.m., CS-1, using Subject Phone 3, received an incoming call (Call #260) from TRUJILLO, who was using Target Phone 4.⁷ During this call, TRUJILLO said, “This is [Individual A]’s son, we’re on our way.” CS-1 said, “Okay, I’ll wait for you guys here [CS-1’s residence].”

15. At approximately 6:33 a.m., DEA agents conducting surveillance observed a gray Chevrolet Suburban, bearing Illinois registration K53XXXX (“the gray Suburban”)⁸ and a green Chrysler van (“the green van”) arrive at the residence of CS-1. Surveillance observed TRUJILLO exit the gray Suburban and enter the residence of CS-1. Surveillance further observed Individual C exit the green van and enter the residence of CS-1. This meeting was not recorded.

16. According to CS-1, while TRUJILLO and Individual C were inside the residence of CS-1, CS-1 provided TRUJILLO a plastic bag that contained one kilogram of cocaine. CS-1 then observed TRUJILLO hand the plastic bag to Individual C, who then hid the plastic bag under a jacket he was carrying. TRUJILLO handed CS-1 three bundles of United States currency and told CS-1 that the bundles totaled \$7,000.

17. At approximately 6:48 a.m., surveillance observed TRUJILLO exit the residence of CS-1 and re-enter the gray Suburban. Surveillance further observed Individual C exit the residence of CS-1 and enter the green van. Both vehicles departed the area. Surveillance observed both vehicles drive in tandem, with little space between the vehicles, consistent with counter-surveillance

⁷ Target Phone 4 was intercepted from March 2, 2012 to on or about March 9, 2012, pursuant to an order signed by the Chief Judge. On or about March 9, 2012, Target Phone 4 became inactive.

⁸ The grey suburban is registered to Individual A, at an address on the 2400 block of W. Jarvis Street, Chicago, Illinois.

techniques. Surveillance then observed the gray Suburban enter a Shell gas station located on the 190th block of Oakton Street, Evanston, Illinois, to conduct a U-turn. The green van drove to the parking lot, located on the 600 block of Pitner Avenue, Evanston, Illinois (“the parking lot on Pitner”).

18. At approximately 7:22 a.m., surveillance observed the gray Suburban arrive at the parking lot on Pitner.

19. At approximately 7:50 a.m., DEA agents met with CS-1 and recovered the bundles of cash provided to CS-1 by TRUJILLO and the two excess kilograms of cocaine provided to CS-1 by DEA agents. The cash provided to CS-1 by TRUJILLO totaled approximately \$7,000. DEA agents searched CS-1 for excess money and contraband with negative results.

B. TRUJILLO Made a Partial Payment for Cocaine to CS-1 on December 23, 2011

20. On December 23, 2011, at approximately 2:40 p.m., CS-1 received a call on Subject Phone 3 from Individual A using PTT 72*9*XXXXX (hereinafter, “Individual A Phone 2”) (Call#304). During the call, Individual A stated, “Hey, I’m calling you because the guy [TRUJILLO] is going to go over there right now. He’s going to bring you some money [payment for cocaine]. I wasn’t able to complete it. But I’ll call the guy who takes care of me here [Individual A’s supplier], because he’s waiting...he [Individual A’s supplier] told me to give you whatever I’ve got right now because we don’t want him to think that we’re acting stupid [trying to avoid payment] so he’s [TRUJILLO] going to bring you that and later on or tomorrow morning.”

21. As the call continued, Individual A said, “He’s [TRUJILLO] going to try to bring you everything because not a whole lot went out today [sales of cocaine were slow]...so, uh... my son [TRUJILLO] is going to bring you that and they are going to send 1,000 to the guy down there [a

partial payment of \$1,000 to the supplier]...well, 1,500 [\$1,500]... but 500 I'm going to give the man [Individual A's supplier]. And the other man [unidentified individual] asked me to send him 1,000 [\$1,000] so then the total that I'm going to be giving you is going to be 6,000 [\$6,000] the 1,000 [\$1,000] for the guy [to the supplier] and the 5,000 [\$5,000] my son [TRUJILLO] is going to take to you."

22. As the call continued, Individual A stated, "Well, the thing is that I told him [Individual A's supplier] I was going to bring 14 [\$14,000] but the man [unidentified individual] just left and he's going to be a while, so it's just better to bring you whatever they [unidentified individuals] have there. And in the morning...when my son [TRUJILLO] is back he'll bring you the rest, so he doesn't think I'm playing or something. Because you know during these days it's not very good, it's very slow [cocaine sales were slow]." CS-1 replied, "Okay, then sounds good, is your son [TRUJILLO] coming already or around what time he'll be here? Because I'm out. I had nothing to do and I went out." Individual A stated, "Yeah, he's headed there already. Let me see where he's at."

23. At approximately 3:16 p.m., CS-1 received a call on Subject Phone 3 from TRUJILLO who was using Target Phone 4 (Call #318). During the call, TRUJILLO said, "Ma'am, I'm on my way already, I'm on Harlem." CS-1 stated, "I'm here at the shopping center that's on Lawrence . . . I'm at a Thai restaurant, call me to let me know if you want me to come out or if you're coming in." TRUJILLO said, "It's better if I just pick you up."

24. Later that day, at approximately 3:20 p.m., DEA agents searched CS-1 for contraband and excess money with negative results. DEA agents maintained continuous surveillance as CS-1 walked to the area near a shopping center located near the intersection of Lawrence Avenue and

Oketo Avenue in Harwood Heights, Illinois (“the shopping center”).

25. Beginning at approximately 3:40 p.m., surveillance observed the following: (a) TRUJILLO arrive in the gray Suburban at the parking lot of the shopping center; and (b) CS-1 enter the gray Suburban. This meeting was not recorded.

26. According to CS-1, while inside the gray Suburban, TRUJILLO handed CS-1 United States currency and told CS-1 that TRUJILLO would contact CS-1 the following day about another cash payment. TRUJILLO told CS-1 to count the money that he had provided CS-1 and CS-1 told TRUJILLO that he/she would count it later.

27. At approximately 3:43 p.m., surveillance observed CS-1 exit the gray Suburban.

28. At approximately 3:47 p.m., CS-1 met with agents at a pre-determined meeting location. CS-1 provided DEA agents with the cash that, according to CS-1, had been provided to CS-1 by TRUJILLO, which totaled \$4,960. CS-1 was searched for contraband and excess money, with negative results.

C. TRUJILLO Made Another Partial Payment for Cocaine to CS-1 on December 31, 2011

29. On December 31, 2011, at approximately 4:29 p.m., CS-1 received a call on Subject Phone 3 from Individual A, who was using Individual A Phone 1 (Call #422). During the call, Individual A said, “If you have something to do, go ahead, and how about at 6:00 to 6:30 to see if I can give you all of it once and for all [remaining payment for the kilogram of cocaine supplied to TRUJILLO and Individual A on December 22, 2011]. He [TRUJILLO] has 3500 [\$3,500] right now and I’m calling the other guy [a cocaine customer] that and he [the cocaine customer] says to give him an hour to see if I could give you all of it. But I have 3500 [\$3,500] for sure. He [TRUJILLO] said he is in traffic and he is coming from the south side and he says the highway is jammed so he

thinks he'll make it to the shop in like 45 minutes so how about 6:00. Please don't feel bad but I can't get rid of the work. [the sales of cocaine were slow]." CS-1 stated, "Don't worry about it, so we'll agree on 6:00 so there won't be any problems, it doesn't matter."

30. As the call continued, Individual A stated, "Let's leave it for 6:00 to see if I can give you everything all of the money. I owe you 6880 plus 40 bucks [\$6,920]. I owe you 6920 [\$6,920]. So we'll do it like that. That's what I owe you. He [unknown individual, possibly TRUJILLO] has 3500 [\$3,500] and hopefully the man gives me 3 or 4000 bucks to finish paying you guys off [a customer was going to pay Individual A \$3000-\$4000, which Individual A was going to use to pay CS-1]. I want to pay you to be done in this situation. I won't have money until Tuesday." CS-1 stated, "That's fine I'll wait for you until 6:00 to 6:30 to see if he [TRUJILLO] can hopefully bring me the rest." Individual A stated, "That's fine I'll wait for you until 6:00 to 6:30 to see if he can hopefully bring me the rest [the remaining payment due for the kilogram of cocaine supplied to TRUJILLO on December 22, 2011]."

31. On December 31, 2011, at approximately 5:10 p.m., CS-1 received a call on Subject Phone 3 from TRUJILLO who was using Target Phone 4 (Call #424). During the call, TRUJILLO said, "I'm on my way to you already." CS-1 stated, "Okay. So I'll head to the office. I'm here at the house. I'll go to where we agreed to meet. Where I met you the last time." TRUJILLO said, "Very well, I already understood. Alright then. I'll call you once I'm there."

32. Later that day, at approximately 5:15 p.m., DEA agents searched CS-1 and CS-1's vehicle for any contraband and excess money with negative results. CS-1 drove to the meet location and agents maintained surveillance on the CS vehicle. The meeting was not recorded.

33. At approximately 5:55, surveillance observed the TRUJILLO arrive in the gray

Suburban at the parking lot of a shopping center located near the intersection of Lawrence Avenue and Oketo Avenue in Harwood Heights, Illinois.

34. At approximately 5:56 p.m., surveillance observed CS-1 enter the gray Suburban.

35. According to CS-1, while inside the gray Suburban TRUJILLO gave CS-1 a bundle of United States currency. TRUJILLO also told CS-1 that after his meeting with CS-1, TRUJILLO was going to wire transfer \$1,000 to an individual in Mexico.

36. At approximately 5:58 p.m., surveillance observed CS-1 exit the gray Suburban and return to CS-1's vehicle and depart the area.

37. At approximately 6:04 p.m., DEA agents met with CS-1 at a pre-determined meeting location. CS-1 provided DEA agents with the cash provided to CS-1 by TRUJILLO, which totaled \$2,670 in United States currency. CS-1 was searched for contraband and excess money, with negative results.

IV. Conclusion

38. Based on the foregoing, I respectfully submit that there is probable cause to believe that: on or about December 22, 2011, TRUJILLO did knowingly and intentionally conspire to possess with intent to distribute a controlled substance, namely, 500 grams or more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(a)(1), all in violation of Title 21, United States Code, Section 846.

FURTHER AFFIANT SAYETH NOT.

MICHAEL J. STONE
Special Agent, Drug Enforcement Administration

SUBSCRIBED AND SWORN to before me on _____, 2012.

Maria Valdez
United States Magistrate Judge