

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ANEES USMANI, a/k/a “Ace,”
NAFEES USMANI,
ALFONSO TROTTER, a/k/a “Alfons,”
“Fonze,” and “Fonzie,”
JUAN BAUTISTA DOMINGUEZ, a/k/a
“Juanito,” and “Diablo,”
RONALD ALLEN,
MUHAMMAD SABIH, a/k/a
“Muhammad Iqbal” and “Sabih
Nawab,”
KENNETH SLAUGHTER,
NEAL BOWENS, a/k/a “Unc,”
MUHAMMAD BILAL KHAN,
AHMED FATAH KHAN MALIK,
ODEH ALSHOBAKI,
AHMED HUSSEIN YOUSEF
ALSAWALHI,
WESAM ABDEL FATTAH, and
LISA USMANI

Case No.

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

COUNT ONE

The SPECIAL JULY 2018 GRAND JURY charges:

1. Beginning no later than in or about October 2017, and continuing until at least on or about March 12, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere:

ANEES USMANI, a/k/a “Ace,”
NAFEES USMANI,
ALFONSO TROTTER, a/k/a “Alfons,”
“Fonze,” and “Fonzie,”
JUAN BAUTISTA DOMINGUEZ, a/k/a “Juanito” and “Diablo,”

RONALD ALLEN,
MUHAMMAD SABIH, a/k/a “Muhammad Iqbal” and “Sabih Nawab,”
MUHAMMAD BILAL KHAN,
AHMED FATAH KHAN MALIK,
ODEH ALSHOBAKI,
AHMED HUSSEIN YOUSEF
ALSAWALHI,
WESAM ABDEL FATTAH, and
LISA USMANI,

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, 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.

COUNT TWO

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about February 1, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

ANEES USMANI, a/k/a "Ace,"
KENNETH SLAUGHTER, and
NEAL BOWENS, a/k/a "Unc,"

defendants 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) and Title 18,
United States Code, Section 2.

COUNT THREE

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about March 9, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

ANEES USMANI, a/k/a "Ace," and
WESAM ABDEL FATTAH,

defendants 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, Section 841(a)(1) and Title 18,
United States Code, Section 2.

FORFEITURE ALLEGATION

The SPECIAL JULY 2018 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) and 846, as set forth in this Indictment, defendant ANEES USMANI, a/k/a “Ace,” shall forfeit to the United States, any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any matter and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a).

2. The property to be forfeited includes, but is not limited to:

- a. A personal money judgment in the amount of approximately \$247,700, and
- b. a 2014 Mercedes G63 bearing VIN WDCYC7DF7EK226353.

If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21,

United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY