

FILED

DB

**JUDGE NORGLÉ
MAGISTRATE JUDGE COX**

2/14/2022

**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA

v.

**JEROME BOYKIN,
ROBERT NARUP,
RODOLFO ORTEGA, and
ROGELIO MANCERA**

Case No. 21 CR 636

**Violations: Title 18, United States Code,
Sections 922(a)(1)(A), 922(g)(1), 924(c),
and 2, and Title 21, United States Code,
Section 841(a)(1)**

SUPERSEDING INDICTMENT

COUNT ONE

The SPECIAL NOVEMBER 2020 GRAND JURY charges:

**Beginning no later than October 2020, and continuing until in or around
October 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and
elsewhere,**

**JEROME BOYKIN and
ROBERT NARUP,**

**defendants herein, not being a licensed dealer within the meaning of Chapter 44,
Title 18, United States Code, did willfully engage in the business of dealing in
firearms;**

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

COUNT TWO

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

Beginning no later than March 2021, and continuing until in or around October 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

**ROGELIO MANCERA and
RODOLFO ORTEGA,**

defendants herein, not being a licensed dealer within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, including, but not limited to, by selling firearms MANCERA received from JEROME BOYKIN;

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

COUNT THREE

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about October 5, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

RODOLFO ORTEGA,

defendant herein, knowing he had previously 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 Glock 19, semiautomatic 9mm pistol, bearing serial number BUAY576, and a Glock 17, semiautomatic 9mm pistol, bearing serial number BNXM715, 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 FOUR

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about October 8, 2021, at Joliet, in the Northern District of Illinois, Eastern Division,

JEROME BOYKIN

defendant herein, did knowingly possess a firearm, namely a .40 caliber Glock 22 pistol bearing serial number MIA1502; a .40 caliber Glock 22 pistol bearing serial number MIA1472; a .40 caliber Glock 22GEN4 pistol bearing serial number MIA2459; a .40 caliber Glock 22GEN4 pistol bearing serial number MIA2501; a .40 caliber Glock 22GEN4 pistol bearing serial number MIA2459; a .40 caliber Glock 22GEN4 pistol bearing serial number MIA2054; a .40 caliber Glock 22GEN4 pistol bearing serial number MIA2627; a .40 caliber Glock 22 pistol bearing serial number MIA1536; a .40 caliber Glock 22 pistol bearing serial number BHX777; a .40 caliber Glock 22 pistol bearing serial number BDV500; a .40 caliber Glock 22 pistol bearing serial number MIA1460; a .40 caliber Glock 22 pistol bearing serial number HBD237; a 9 millimeter Glock 17 pistol bearing serial number AFKC235; a 9 millimeter Glock 17 pistol bearing serial number BSVN668; a 9 millimeter Glock 19GEN5 pistol bearing serial number BRYF969; a .45 caliber Glock 21GEN4 pistol bearing serial number AFNP192; a 9 millimeter Glock 43 pistol bearing serial number ABUW748; a 9 millimeter Glock 43X pistol bearing serial number BUHX346; a 9 millimeter Glock 48 pistol bearing serial number AFPW474; a 9 millimeter Hellcat pistol bearing serial number BA312074; a 9 millimeter Ceska Zbrojovka CZ 10 pistol bearing serial

number C439067; a 9 millimeter Ceska Zbrojovka CZ P-09 pistol bearing serial number C574763; and a 9 millimeter Glock 26GEN5 pistol bearing serial number AEZU946, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a court of the United States, namely attempted possession with intent to distribute a controlled substance, more specifically an attempt to possess a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1);

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FIVE

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about October 19, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

ROGELIO MANCERA,

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely a mixture and substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, and 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 SIX

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about October 19, 2021, at a residence in Schaumburg, in the Northern District of Illinois, Eastern Division,

ROGELIO MANCERA,

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely a mixture and substance containing a detectable amount of marijuana, a Schedule I Controlled Substance;

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

COUNT SEVEN

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about October 19, 2021, at Schaumburg, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROGELIO MANCERA,

defendant herein, did knowingly possess a firearm, namely a loaded multicaliber GGP Grey Ghost Precision pistol bearing serial number GGPC3169; a loaded multicaliber Spike's Tactical LLC ST15 pistol bearing serial number SBR-37187; a loaded 9 millimeter Glock 26GEN5 bearing serial number ADYV451; and a 5.7 millimeter FN semiautomatic pistol bearing serial number 386178427, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a court of the United States, namely possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Five and Count Six of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2020 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841, as set forth in this Indictment, defendants shall forfeit to the United States of America any property used, and intended to be used, in any manner and part, to commit and to facilitate commission of the offense, as provided in Title 21, United States Code, Sections 853(a)(2).

2. In addition, defendants shall forfeit to the United States of America, any firearm and ammunition involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c). The property to be forfeited includes, but is not limited to:

a. A 38 caliber Smith & Wesson revolver bearing serial number DJJ4149BG38;

b. A 9 millimeter CZ75 Compact Ceska Zbrojovka pistol bearing serial number C078613;

c. A Parker Brothers rifle bearing serial number 235507;

d. A 9 millimeter Beretta, Pietro S.P.A. 92FS pistol bearing serial number A120904Z;

e. A 9 millimeter CZ85 B Ceska Zbrojovka pistol bearing serial number A236305;

f. A .40 caliber SP-01 Tactical Ceska Zbrojovka pistol bearing serial number B697088;

- g. A .44 caliber Super Blackhawk Ruger revolver bearing serial number 87-46528;
- h. Assorted ammunition seized by law enforcement on October 15, 2021;
- i. A 5.7 millimeter FN semiautomatic pistol bearing serial number 386178427;
- j. A multicaliber GGP Grey Ghost Precision pistol bearing serial number GGPC3169;
- k. A multicaliber Spike's Tactical LLC ST15 pistol bearing serial number SBR-37187;
- l. A ZZ caliber silencer;
- m. A 12-gauge Beretta 1301 Tactical shotgun bearing serial number TA022544;
- n. A multicaliber Aero Precision X15rifle bearing serial number X303055;
- o. A 9 millimeter FNH USA 509 pistol bearing serial number GKS0174725;
- p. A 9 millimeter Glock 19X pistol bearing serial number BHWZ522;
- q. A 9 millimeter Glock 19X pistol bearing serial number BKKU936;
- r. A .45 caliber Glock 30S pistol bearing serial number WLB763;
- s. A 9 millimeter Glock 19X pistol bearing serial number BPNM326;
- t. A 9 millimeter Glock 19X pistol bearing serial number BPMY398;

- u. A 9 millimeter Glock 19 pistol bearing serial number ZCW089;
- v. A .40 caliber Glock 23GEN5 pistol bearing serial number BTHV499;
- w. A 9 millimeter Glock 26 pistol bearing serial number ACFY517;
- x. A 9 millimeter Glock 19 pistol bearing serial number AEMZ971;
- y. A 9 millimeter Glock 26GEN5 bearing serial number ADYV451;
- z. A .40 caliber Glock 22 pistol bearing serial number AZP679;
- aa. A 10 millimeter Glock 20GEN4 pistol bearing serial number BTRX748;
- bb. A .40 caliber Glock 23 pistol bearing serial number KMN258;
- cc. A 9 millimeter FNH USA FNS-9C bearing serial number CSU0037340;
- dd. A 9 millimeter FNH USA 509 pistol bearing serial number GKS0157983;
- ee. A 9 millimeter FNH USA FNS-9C pistol bearing serial number CSU0039901;
- ff. A .45 caliber FNH USA FNX-45 Tactical pistol bearing serial number FX3U032100;
- gg. A 5.7 millimeter FN semiautomatic pistol bearing serial number 386202895;
- hh. A .357 caliber FNH USA FNP357 pistol bearing serial number 61EMR10184;

- ii. A 9 millimeter FNH USA FNX-9 pistol bearing serial number FX1U031509;
- jj. A .45 caliber FNH USA FNX-45 pistol bearing serial number FX3U004033;
- kk. A .45 caliber FNH USA FNX-45 pistol bearing serial number FX3U018389;
- ll. A 9 millimeter Wilson Combat Hackathorn Special pistol bearing serial number WC17561;
- mm. Assorted ammunition seized by law enforcement on October 19, 2021; and
- nn. A 2018 black Ford Edge bearing license plate CR16812 seized by agents on October 19, 2021.

TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY