

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**RECEIVED**

**SEP 13 2022**

UNITED STATES OF AMERICA	)	Case No.	THOMAS G. BRUTON
	)		CLERK, U.S. DISTRICT COURT
v.	)	Violations: Title 18, United States	
	)	Code, Sections 922(g) and 924(c),	
SEAN DWYER and	)	and Title 21, United States Code,	
BRIDGETT MASSEY	)	Sections 841(a)(1) and 846	
	)		
	)	<u>UNDER SEAL</u>	

COUNT ONE

The SPECIAL MAY 2021 GRAND JURY charges:

1. Beginning no later than in or about August of 2022, and continuing until at least on or about August 17, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SEAN DWYER and  
BRIDGETT MASSEY,

defendants herein, did conspire with each other and 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.

4. Before SEAN DWYER committed the offense charged in this count, DWYER had a final conviction for a serious violent felony, namely, a conviction in Case Number 93 CR 1841301 (Circuit Court of Cook County, Illinois) for Attempted

Murder, in violation of 720 ILCS 5/9-1(a)(1), 5/8-4, for which he served more than 12 months of imprisonment, and a conviction in Case Number 93 CR 1721801 (Circuit Court of Cook County, Illinois) for Robbery, in violation of 720 ILCS 5/18-1(a), for which he served more than 12 months of imprisonment.

COUNT TWO

The SPECIAL MAY 2021 GRAND JURY further charges:

1. On or about August 17, 2022, on the 5300 block of South Morgan Street, Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SEAN DWYER and  
BRIDGETT MASSEY,

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, 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.

2. Before SEAN DWYER committed the offense charged in this count, DWYER had a final conviction for a serious violent felony, namely, a conviction in Case Number 93 CR 1841301 (Circuit Court of Cook County, Illinois) for Attempted Murder, in violation of 720 ILCS 5/9-1(a)(1), 5/8-4, for which he served more than 12 months of imprisonment, and a conviction in Case Number 93 CR 1721801 (Circuit Court of Cook County, Illinois) for Robbery, in violation of 720 ILCS 5/18-1(a), for which he served more than 12 months of imprisonment.

**COUNT THREE**

The SPECIAL MAY 2021 GRAND JURY further charges:

1. On or about August 17, 2022, on the 10900 block of South California Avenue, Chicago, in the Northern District of Illinois, Eastern Division,

SEAN DWYER,

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, Section 841(a)(1).

2. Before SEAN DWYER committed the offense charged in this count, SEAN DWYER had a final conviction for a serious violent felony, namely, a conviction in Case Number 93 CR 1841301 (Circuit Court of Cook County, Illinois) for Attempted Murder, in violation of 720 ILCS 5/9-1(a)(1), 5/8-4, for which he served more than 12 months of imprisonment, and a conviction in Case Number 93 CR 1721801 (Circuit Court of Cook County, Illinois) for Robbery, in violation of 720 ILCS 5/18-1(a), for which he served more than 12 months of imprisonment.

**COUNT FOUR**

The SPECIAL MAY 2021 GRAND JURY further charges:

On or about August 17, 2022, at Chicago, in the Northern District of Illinois,  
Eastern Division,

SEAN DWYER,

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 Masterpiece Arms, MPA 930, 9mm semi-automatic pistol, bearing serial number F12805, and a Walther PPK 9mm semi-automatic pistol bearing serial number 160886S, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

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

**COUNT FIVE**

The SPECIAL MAY 2021 GRAND JURY further charges:

On or about August 17, 2022, at Chicago, in the Northern District of Illinois,  
Eastern Division,

**SEAN DWYER,**

defendant herein, did knowingly possess a firearm, namely, a Masterpiece Arms, MPA 930, 9mm semi-automatic pistol, bearing serial number F12805, and a Walther PPK 9mm semi-automatic pistol, bearing serial number 160886S, in furtherance of a drug trafficking crime for which he 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 Three of this Indictment.

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

## FORFEITURE ALLEGATION

The SPECIAL MAY 2021 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846, as set forth in this Indictment, defendant shall forfeit to the United States of America 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 manner and part, to commit and to facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a).

2. In addition, upon conviction of an offense in violation of Title 18, United States Code, Sections 922(g) and 924(c), as set forth in this Indictment, defendant 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).

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

a. a Masterpiece Arms, MPA 930, 9mm semi-automatic pistol, bearing serial number F12805, and associated ammunition;

b. a Walther PPK 9mm semi-automatic pistol bearing serial number 160886S, and associated ammunition;

c. approximately \$85,451 seized by law enforcement on August 17, 2022, from a residence at 10945 S. California Avenue, Chicago, Illinois; and

d. an orange Dodge Challenger Hellcat bearing Illinois registration CG20856.

4. 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:

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FOREPERSON

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Signed by Erika Csicsila on behalf of the  
UNITED STATES ATTORNEY