

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	
)	No. 13 CR 952
ERIC ROGERS,)	
also known as "E," "Big E," "the G,")	Violations: Title 18, United
ERIC CURTIS,)	States Code, Sections 922(g)(1),
also known as "Little E," "Lil E,")	924(c)(1)(A), and 1951(a)
MARCUS HARRIS,)	
DANIEL WRIGHT,)	
ANDRE WADLINGTON-ANTHONY,)	
TONY JOHNSON, and)	
LAVELL HUGHES)	

COUNT ONE

The SPECIAL JULY 2013 GRAND JURY charges:

1. Beginning in or around January 2013, and continuing until on or about December 14, 2013, at Addison, Norridge, Deerfield, Woodridge, in the Northern District of Illinois, Eastern Division, and elsewhere,

ERIC ROGERS, also known as "E," "Big E," "the G," and
ERIC CURTIS, also known as "Little E," "Lil E,"

defendants herein, did conspire with each other and with Ryan Rogers, Marcus Harris, Daniel Wright, Andre Wadlington-Anthony, Tony Johnson, Lavell Hughes, and others known and unknown to the Grand Jury, to obstruct, delay, and affect commerce by robbery, as "robbery" and "commerce" are defined in Title 18, United States Code, Section 1951.

2. It was part of the conspiracy that defendants ERIC ROGERS and ERIC

CURTIS identified cellular telephone stores to target for armed robberies, and selected, equipped, and paid other individuals, such as Marcus Harris, Daniel Wright, Andre Wadlington-Anthony, Tony Johnson, and Lavell Hughes to commit the armed robberies at their direction.

3. It was further part of the conspiracy that defendants ERIC ROGERS and ERIC CURTIS supplied co-conspirators, such as Marcus Harris, Daniel Wright, Andre Wadlington-Anthony, and Tony Johnson, with firearms and other equipment to commit the armed robberies.

4. It was further part of the conspiracy that defendants ERIC ROGERS and ERIC CURTIS directed and traveled with co-conspirators, such as Marcus Harris, Daniel Wright, Andre Wadlington-Anthony, Tony Johnson, and Lavell Hughes to the robbery locations, and conducted surveillance and communicated with the co-conspirators by cellular telephone while the robberies were ongoing.

5. It was further part of the conspiracy that co-conspirators, such as Marcus Harris, Daniel Wright, Andre Wadlington-Anthony, and Tony Johnson, at the direction of defendants ERIC ROGERS and ERIC CURTIS, entered cellular telephone stores while brandishing firearms in order to steal cellular telephones and tablet computers from the person and presence of store employees.

6. It was further part of the conspiracy that, after the robberies had been completed, defendants ERIC ROGERS and ERIC CURTIS directed co-conspirators,

such as Marcus Harris, Daniel Wright, Andre Wadlington-Anthony, and Tony Johnson, to deliver the stolen cellular telephones and tablet computers to defendants ERIC ROGERS and ERIC CURTIS.

7. It was further part of the conspiracy that defendants ERIC ROGERS and ERIC CURTIS paid co-conspirators such as Marcus Harris, Daniel Wright, Andre Wadlington-Anthony, and Tony Johnson, to commit armed robberies at their direction.

8. It was further part of the conspiracy that:

(a) on or about January 31, 2013, defendant ERIC ROGERS, Daniel Wright, and Marcus Harris robbed a Sprint store located at 1323 West Lake Street, Addison, Illinois, taking cellular telephones, tablet computers, and United States currency from employees at gunpoint;

(b) on or about February 4, 2013, defendant ERIC ROGERS, Daniel Wright, and Marcus Harris, robbed an AT&T store located at 113 J Street, LaPorte, Indiana, taking cellular telephones from employees at gunpoint;

(c) on or about March 19, 2013, defendants ERIC ROGERS, ERIC CURTIS, and Andre Wadlington-Anthony robbed an AT&T store located at 4155½ North Harlem Avenue, Norridge, Illinois, taking cellular telephones from employees at gunpoint;

(d) on or about April 4, 2013, defendant ERIC CURTIS, Andre

Wadlington-Anthony, and Tony Johnson robbed a Sprint store located at 101 River Road, East Peoria, Illinois, taking cellular telephones and tablet computers from employees at gunpoint;

(e) on or about April 8, 2013, defendant ERIC CURTIS, Andre Wadlington-Anthony, Tony Johnson, and Lavell Hughes robbed a T-Mobile store located at 110 South Waukegan, Deerfield, Illinois, taking cellular telephones from employees at gunpoint; and

(f) on or about December 14, 2013, defendants ERIC CURTIS, ERIC ROGERS, and others robbed a T-Mobile store located at 1001 West 75th Street, Woodridge, Illinois, taking cellular telephones and tablet computers from employees at gunpoint.

9. It was further part of the conspiracy that ERIC ROGERS, ERIC CURTIS, Marcus Harris, Daniel Wright, Andre Wadlington-Anthony, and Tony Johnson, and Lavell Hughes, would and did conceal and hide, and cause to be concealed and hidden, the purposes of acts done in furtherance of the conspiracy;

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

The SPECIAL JULY 2013 GRAND JURY further charges:

On or about January 31, 2013, at Addison, in the Northern District of Illinois,
Eastern Division,

ERIC ROGERS, also known as “E,” “Big E,” and “the G,”
MARCUS HARRIS, and
DANIEL WRIGHT,

defendants herein, did obstruct, delay, and affect “commerce,” and the movement of articles and commodities in commerce, by “robbery,” as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain cellular telephones, tablet computers, and United States currency from the person and in the presence of an employee of a Sprint store located at 1323 West Lake Street, Addison, Illinois, against the employee’s will, by means of actual and threatened force, and fear of injury to that employee;

In violation of Title 18, United States Code, Section 1951(a).

COUNT THREE

The SPECIAL JULY 2013 GRAND JURY further charges:

On or about January 31, 2013, at Addison, in the Northern District of Illinois,
Eastern Division,

ERIC ROGERS, also known as “E,” “Big E,” and “the G,”
MARCUS HARRIS, and
DANIEL WRIGHT,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, a robbery affecting commerce in violation of Title 18, United States Code, Section 1951(a), as charged in Count Two of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A) and 2.

COUNT FOUR

The SPECIAL JULY 2013 GRAND JURY further charges:

On or about March 19, 2013, at Norridge, in the Northern District of Illinois,
Eastern Division,

ERIC ROGERS, also known as “E,” “Big E,” and “the G,”
ERIC CURTIS, also known as “Little E,” “Lil E”, and
ANDRE WADLINGTON-ANTHONY,

defendants herein, did obstruct, delay, and affect “commerce,” and the movement of articles and commodities in commerce, by “robbery,” as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain cellular telephones from the person and in the presence of an employee of an AT&T Store located at 4155 ½ North Harlem Avenue, Norridge, Illinois, against the employee’s will, by means of actual and threatened force, and fear of injury to that employee;

In violation of Title 18, United States Code, Section 1951(a).

COUNT FIVE

The SPECIAL JULY 2013 GRAND JURY further charges:

On or about March 19, 2013, at Norridge, in the Northern District of Illinois,
Eastern Division,

ERIC ROGERS, also known as “E,” “Big E,” and “the G,”
ERIC CURTIS, also known as “Little E,” “Lil E”, and
ANDRE WADLINGTON-ANTHONY,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, a robbery affecting commerce in violation of Title 18, United States Code, Section 1951(a), as charged in Count Four of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A) and 2.

COUNT SIX

The SPECIAL JULY 2013 GRAND JURY further charges:

On or about April 8, 2013, at Deerfield, in the Northern District of Illinois,
Eastern Division,

ERIC CURTIS, also known as "Little E," "Lil E",
TONY JOHNSON,
ANDRE WADLINGTON-ANTHONY, and
LAVELL HUGHES,

defendants herein, did obstruct, delay, and affect "commerce," and the movement of articles and commodities in commerce, by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain cellular telephones from the person and in the presence of an employee of a T-Mobile Store located at 110 South Waukegan, Deerfield, Illinois, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

In violation of Title 18, United States Code, Section 1951(a).

COUNT SEVEN

The SPECIAL JULY 2013 GRAND JURY further charges:

On or about April 8, 2013, at Deerfield, in the Northern District of Illinois,
Eastern Division,

ERIC CURTIS, also known as "Little E," "Lil E,"
TONY JOHNSON,
ANDRE WADLINGTON-ANTHONY, and
LAVELL HUGHES,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, a robbery affecting commerce in violation of Title 18, United States Code, Section 1951(a), as charged in Count Six of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A) and 2.

COUNT EIGHT

The SPECIAL JULY 2013 GRAND JURY further charges:

On or about April 8, 2013, at Deerfield, in the Northern District of Illinois, Eastern Division, and elsewhere,

ERIC CURTIS, also known as “Little E,” “Lil E,”

defendant herein, previously having 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 loaded Ruger, Intratec Cat. 9, 9mm semi-automatic pistol, bearing serial number 09157, 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 NINE

The SPECIAL JULY 2013 GRAND JURY further charges:

On or about December 14, 2013, at Woodridge, in the Northern District of Illinois, Eastern Division,

ERIC ROGERS, also known as “E,” “Big E,” and “the G,” and
ERIC CURTIS, also known as “Little E,” “Lil E,”

defendants herein did obstruct, delay, and affect “commerce,” and the movement of articles and commodities in commerce, by “robbery,” as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain cellular telephones and tablet computers from the person and in the presence of an employee of a T-Mobile Store located at 1001 West 75th Street, Woodridge, Illinois, against the employee’s will, by means of actual and threatened force, and fear of injury to that employee;

In violation of Title 18, United States Code, Section 1951(a).

FORFEITURE ALLEGATION

The SPECIAL JULY 2013 GRAND JURY alleges:

1. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1951(a), as set forth in this Indictment, the defendants shall forfeit to the United States of America any property which constitutes or is derived from proceeds of the offenses, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. In addition, the defendants shall forfeit to the United States of America, any firearms or ammunition:

a. involved in or 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); and

b. found in the possession or under the immediate control of the defendant at the time of arrest, as provided in 18 U.S.C. § 3665, upon conviction of any offense for committing or attempting to commit any felony involving the use of threats, force, or violence or perpetrated in whole or in part by the use of firearms.

3. The property to be forfeited includes, but is not limited to, a Ruger, Intratec Cat. 9, 9mm semi-automatic pistol, bearing serial number 09157 and associated ammunition.

4. If any of the property described above, as a result of any act or omission by the defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; 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 subdivided without difficulty; the United States of America shall be entitled to forfeiture of substitute property, as provided by Title 21, United States Code Section 853(p).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY