

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No.
)	
v.)	
)	Violations: Title 18, United States
)	Code Sections 922(g), 924(c)(1)(A),
JUAN SANCHEZ, and)	1951(a), and 2.
CARLOS OCHOA)	

COUNT ONE

The SPECIAL JULY 2010 GRAND JURY charges:

1. Beginning on or about October 5, 2010, and continuing until on or about November 17, 2010, at Chicago, Aurora, in the Northern District of Illinois, Eastern Division, and elsewhere,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did conspire with each other to obstruct, delay, and affect commerce by robbery, as “robbery” and “commerce” are defined in Title 18, United States Code, Section 1951, in violation of Title 18, United States Code, Section 1951(a).

2. It was part of the conspiracy that JUAN SANCHEZ and CARLOS OCHOA agreed to rob various retail stores and businesses in Chicago and surrounding areas in the Northern District of Illinois.

3. It was further part of the conspiracy that JUAN SANCHEZ and CARLOS OCHOA identified retail stores and businesses to rob with a firearm, wore sunglasses and hats, and conducted surveillance inside the retail stores and businesses prior to committing the armed robberies; and possessed and displayed firearms while robbing the retail stores and businesses of United States Currency and other property.

4. It was further part of the conspiracy that JUAN SANCHEZ and CARLOS OCHOA would and did conceal and hide, and cause to be concealed and hidden, the purposes of acts done in furtherance of the conspiracy.

5. In furtherance of the conspiracy, JUAN SANCHEZ and CARLOS OCHOA committed the following acts among others:

(a) On or about October 5, 2010, JUAN SANCHEZ and CARLOS OCHOA robbed Freedom Wireless, a Cricket Wireless dealer, located at 5002 S. Archer in Chicago, Illinois, taking approximately \$3,800 from an employee of Dollar Express at gunpoint;

(b) On or about October 13, 2010, JUAN SANCHEZ and CARLOS OCHOA robbed Jazmin Flowers, a flower shop located in Chicago, Illinois, taking approximately \$100 from an employee of Jazmin Flowers at gunpoint;

(c) On or about October 15, 2010, JUAN SANCHEZ and CARLOS OCHOA robbed Supermercado Rivera, a grocery store located in Chicago, Illinois, taking approximately \$175 from an employee of Supermercado Rivera at gunpoint;

(d) On or about October 25, 2010, JUAN SANCHEZ and CARLOS OCHOA robbed La Lupita, a grocery store located in Chicago, Illinois, taking an amount of United States currency from an employee of La Lupita at gunpoint;

(e) On or about October 27, 2010, JUAN SANCHEZ and CARLOS OCHOA robbed Casa Blanca, a grocery store located in Aurora, Illinois, taking an amount of United States currency from an employee of Casa Blanca at gunpoint;

(f) On or about November 7, 2010, JUAN SANCHEZ and CARLOS OCHOA robbed World Communications, a Cricket Wireless dealer located at 3605 N. Western Avenue in Chicago, Illinois, taking an amount of United States currency and two cellular telephones from an employee of World Communication at gunpoint;

(g) On or about November 12, 2010, JUAN SANCHEZ and CARLOS OCHOA robbed New England Pharmacy, a retail drugstore located in Chicago, Illinois, taking an amount of United States currency from an employee of New England Pharmacy at gunpoint; and

(h) On or about November 17, 2010, JUAN SANCHEZ and CARLOS OCHOA robbed Cleartalk Communications LLC, a Cricket Wireless dealer located at 5419 S. Kedzie Avenue in Chicago, Illinois, taking approximately \$200 from an employee of Cleartalk Communications LLC at gunpoint;

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

COUNT TWO

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about October 5, 2010, at Chicago, in the Northern District of Illinois, Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did commit a “robbery” which obstructed, delayed and affected “commerce” and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendants, by means of actual and threatened force, violence, and fear of injury to the person of a store employee, did unlawfully take and obtain from the person and presence of that store employee against her will, United States currency and property belonging to and in the custody, control, and possession of Freedom Wireless, a Cricket Wireless dealer located at 5002 S. Archer Avenue in Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about October 5, 2010, at Chicago, in the Northern District of Illinois, Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did use and carry 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, Sections 924(c)(1)(A) and 2.

COUNT FOUR

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about October 13, 2010, at Chicago, in the Northern District of Illinois, Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did commit a “robbery” which obstructed, delayed and affected “commerce” and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendants, by means of actual and threatened force, violence, and fear of injury to the person of a store employee, did unlawfully take and obtain from the person and presence of that store employee against her will, United States currency and property belonging to and in the custody, control, and possession of Jazmin Flowers located in Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT FIVE

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about October 15, 2010, at Chicago, in the Northern District of Illinois, Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did use and carry 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, Sections 924(c)(1)(A) and 2.

COUNT SIX

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about October 5, 2010, at Chicago, in the Northern District of Illinois, Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did commit a “robbery” which obstructed, delayed and affected “commerce” and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendants, by means of actual and threatened force, violence, and fear of injury to the person of a store owner, did unlawfully take and obtain from the person and presence of that store owner against her will, United States currency and property belonging to and in the custody, control, and possession of Supermercado Rivera located in Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT SEVEN

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about October 15, 2010, at Chicago, in the Northern District of Illinois, Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did use and carry 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, Sections 924(c)(1)(A) and 2.

COUNT EIGHT

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about October 25, 2010, at Chicago, in the Northern District of Illinois, Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did commit a “robbery” which obstructed, delayed and affected “commerce” and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendants, by means of actual and threatened force, violence, and fear of injury to the person of a store employee, did unlawfully take and obtain from the person and presence of that store employee against her will, United States currency and property belonging to and in the custody, control, and possession of La Lupita in Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT NINE

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about October 25, 2010, at Chicago, in the Northern District of Illinois, Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did use and carry 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 Eight of this Indictment;

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

COUNT TEN

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about October 27, 2010, at Aurora, in the Northern District of Illinois, Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did commit a “robbery” which obstructed, delayed and affected “commerce” and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendants, by means of actual and threatened force, violence, and fear of injury to the person of a store employee, did unlawfully take and obtain from the person and presence of that store employee against her will, United States currency and property belonging to and in the custody, control, and possession of Casa Blanca in Aurora, Illinois;

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT ELEVEN

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about October 27, 2010, at Chicago, in the Northern District of Illinois, Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did use and carry 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 Ten of this Indictment;

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

COUNT TWELVE

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about November 7, 2010, at Chicago, in the Northern District of Illinois,
Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did commit a “robbery” which obstructed, delayed and affected “commerce” and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendants, by means of actual and threatened force, violence, and fear of injury to the person of a store employee, did unlawfully take and obtain from the person and presence of that store employee against her will, United States currency and property belonging to and in the custody, control, and possession of World Communications, a Cricket Wireless dealer located at 3605 N. Western Avenue in Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THIRTEEN

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about November 7, 2010, at Chicago, in the Northern District of Illinois,
Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did use and carry 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 Twelve of this Indictment;

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

COUNT FOURTEEN

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about November 12, 2010, at Chicago, in the Northern District of Illinois,
Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did commit a “robbery” which obstructed, delayed and affected “commerce” and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendants, by means of actual and threatened force, violence, and fear of injury to the person of a store employee, did unlawfully take and obtain from the person and presence of that store employee against his will, United States currency and property belonging to and in the custody, control, and possession of New England Pharmacy in Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT FIFTEEN

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about November 12, 2010, at Chicago, in the Northern District of Illinois,
Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did use and carry 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 Fourteen of this Indictment;

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

COUNT SIXTEEN

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about November 17, 2010, at Chicago, in the Northern District of Illinois,
Eastern Division,

JUAN SANCHEZ, and
CARLOS OCHOA,

defendants herein, did commit a “robbery” which obstructed, delayed and affected “commerce” and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendants, by means of actual and threatened force, violence, and fear of injury to the person of a store employee, did unlawfully take and obtain from the person and presence of that store employee against her will, United States currency and property belonging to and in the custody, control, and possession of Cleartalk Communications LLC, a Cricket Wireless dealer located at 5419 S. Kedzie Avenue in Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT SEVENTEEN

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about November 17, 2010, at Chicago, in the Northern District of Illinois,
Eastern Division,

**JUAN SANCHEZ, and
CARLOS OCHOA,**

defendants herein, did use and carry 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 Sixteen of this Indictment;

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

COUNT EIGHTEEN

The SPECIAL JULY 2010 GRAND JURY further charges:

On or about November 22, 2010, at Chicago, in the Northern District of Illinois,
Eastern Division,

JUAN SANCHEZ,

defendant herein, having 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 loaded Davies Industries P380 .38 caliber handgun with an obliterated serial number, which firearm had traveled in interstate commerce prior to the defendant's possession of the firearm;

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

FORFEITURE ALLEGATION

The SPECIAL JULY 2010 GRAND JURY further alleges:

1. The allegation contained in Count Eighteen of this Indictment is realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of his violation of Title 18, United States Code, Section 922(g)(1) as alleged in the foregoing Indictment,

JUAN SANCHEZ,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all right, title, and interest he may have in any property involved in the charged offense.

3. The interest of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) is one Davis Industries P380 .38 caliber handgun with an obliterated serial number and associated ammunition;

All pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY