

**FILED**

SEP 13 2022

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

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DEANDRE NORELS JR.

Violations: Title 18, United States Code,  
Sections 1951(a), 924(c)(1)(A), 924(j)(1),  
and 2

**1:22-cr-00450**

**Judge Thomas M. Durkin**

**Magistrate Judge Beth W. Jantz**

**COUNT ONE**

The SPECIAL MAY 2021 GRAND JURY charges:

1. Beginning on or about October 16, 2021, and continuing until on or about November 11, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DEANDRE NORELS JR.,

defendant herein, did conspire with Individual A to 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).

2. It was part of the conspiracy that defendant, using a social media messaging service, arranged a meeting with Victim A, whom defendant knew was selling marijuana, so that defendant could rob Victim A of Victim A’s marijuana supply and proceeds from the sale of marijuana.

3. It was further part of the conspiracy that defendant and Individual A agreed to use a firearm in order to take property, namely marijuana and proceeds

from the sale of marijuana, from the person and in the presence of Victim A, against Victim A's will, by means of actual and threatened force.

4. It was further part of the conspiracy that defendant and Individual A brought a firearm, namely a Glock 19 Gen 5, 9mm semiautomatic pistol bearing serial number BPD792, to the meeting with Victim A at the location specified by defendant, so that defendant and Individual A could rob Victim A.

5. It was further part of the conspiracy that defendant and Individual A obtained, possessed, brandished, and discharged a firearm to facilitate the taking of Victim A's marijuana.

6. It was further part of the conspiracy that defendant, Individual A, and others known and unknown to the Grand Jury, 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, Sections 1951(a) and 2.

COUNT TWO

The SPECIAL MAY 2021 GRAND JURY further charges:

On or about November 11, 2021, at Chicago, in the Northern District of Illinois,  
Eastern Division,

DEANDRE NORELS JR.,

defendant 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 defendant did unlawfully take and obtain property from the person and in the presence of Victim A, against Victim A’s will, by means of actual and threatened force;

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

**COUNT THREE**

The SPECIAL MAY 2021 GRAND JURY further charges:

On or about November 11, 2021, at Chicago, in the Northern District of Illinois,  
Eastern Division,

DEANDRE NORELS JR.,

defendant herein, and Individual A, did use, carry, brandish, and discharge a firearm,  
namely a Glock 19 Gen 5, 9mm semiautomatic pistol bearing serial number  
BPD792, during and in relation to a crime of violence for which he may be  
prosecuted in a court of the United States, namely robbery, 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 MAY 2021 GRAND JURY further charges:

On or about November 11, 2021, at Chicago, in the Northern District of Illinois,  
Eastern Division,

DEANDRE NORELS JR.,

defendant herein, and Individual A, in the course of a violation of Title 18, United States Code, Section 924(c), as charged in Count Three of this Indictment caused the death of Victim A through the use of the firearm, which killing was murder as defined in Title 18, United States Code, Section 1111(a).

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

### FORFEITURE ALLEGATION

The SPECIAL MAY 2021 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 924(c) and 1951(a), as set forth in this Indictment, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a Glock 19 Gen 5, 9mm semiautomatic pistol bearing serial number BPD792, and associated ammunition.

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY