

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 12 CR 853
v.)	
)	Violations: Title 18, United States
ROBERT L. BERRIOS, aka "Chazzo,")	Code, Sections 922(g), 924(c)(1)(A), 924(e),
JULIO RODRIGUEZ, aka "Jelly," and)	1951(a), and 2
DAVID REVIS, aka "Red")	

COUNT ONE

The SPECIAL AUGUST 2012 GRAND JURY charges:

1. Beginning on or about January 23, 2012, and continuing until on or about November 6, 2012, at Chicago, Norridge, and Cicero, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROBERT L. BERRIOS, aka "Chazzo,"
JULIO RODRIGUEZ, aka "Jelly," and
DAVID REVIS, aka "Red,"

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, to obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, by robbery, as "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b), in violation of Title 18, United States Code, Section 1951(a).

2. It was part of the conspiracy that the defendants ROBERT L. BERRIOS, aka "Chazzo," JULIO RODRIGUEZ, aka "Jelly," and DAVID REVIS, aka "Red," 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 the defendants:
- (a) identified targets, including currency exchanges, cellular telephone stores, and other commercial establishments, for armed robberies;
 - (b) obtained intelligence on the targeted establishments, before committing armed robberies;
 - (c) obtained, possessed, and brandished, a firearm in connection with the commission of armed robberies;
 - (d) used cellular telephones to communicate with one another while planning and committing armed robberies;
 - (e) used a gold 2004 Hyundai Elantra, a white 1993 Lexus SC300, and a green 1999 BMW 323i for transportation to and from the location of armed robberies, and as a post from which to conduct counter-surveillance during armed robberies;
 - (f) physically restrained some employees of the targeted establishments, in some instances with zip ties, while committing some armed robberies;
 - (g) concealed their identities by wearing masks and gloves and other items; and
 - (h) robbed the retail stores and commercial establishments of United States Currency; and

4. It was further part of the conspiracy that ROBERT L. BERRIOS, aka “Chazzo,” JULIO RODRIGUEZ, aka “Jelly,” and DAVID REVIS, aka “Red,” 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 AUGUST 2012 GRAND JURY further charges:

On or about January 23, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ROBERT L. BERRIOS, aka “Chazzo,”

defendant herein, did obstruct, delay, and affect “commerce,” as defined in Title 18, United States Code, Section 1951(b), and the movement of articles and commodities in commerce, by robbery, in that the defendant did unlawfully take and obtain a quantity of United States currency from the person and in the presence of an employee of a Walgreens store, located at 5140 W. Diversey in Chicago, Illinois, against his 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 AUGUST 2012 GRAND JURY further charges:

On or about July 1, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ROBERT L. BERRIOS, aka “Chazzo,”

defendant herein, did obstruct, delay, and affect “commerce,” as defined in Title 18, United States Code, Section 1951(b), and the movement of articles and commodities in commerce, by robbery, in that the defendant did unlawfully take and obtain a quantity of United States currency from the person and in the presence of an employee of a Walgreens store, located at 5935 W. Addison in Chicago, Illinois, against her 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 FOUR

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about July 28, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ROBERT L. BERRIOS, aka “Chazzo,”

defendant herein, did obstruct, delay, and affect “commerce,” as defined in Title 18, United States Code, Section 1951(b), and the movement of articles and commodities in commerce, by robbery, in that the defendant did unlawfully take and obtain a quantity of United States currency from the person and in the presence of an employee of a Currency Exchange, located at 2753 N. Ashland in Chicago, Illinois, against her 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 AUGUST 2012 GRAND JURY further charges:

On or about August 15, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ROBERT L. BERRIOS, aka "Chazzo," and
DAVID REVIS, aka "Red,

defendants herein, did obstruct, delay, and affect "commerce," as defined in Title 18, United States Code, Section 1951(b), and the movement of articles and commodities in commerce, by robbery, in that the defendants did unlawfully take and obtain a quantity of United States currency from the person and in the presence of an employee of a Currency Exchange, located at 2814 N. Milwaukee Avenue in Chicago, Illinois, against her will, by means of actual and threatened force, and fear of injury to that employee;

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

COUNT SIX

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about August 15, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ROBERT L. BERRIOS, aka "Chazzo," and
DAVID REVIS, aka "Red,"

defendants herein, did use, carry, and brandish a firearm, namely, a .22 caliber Jennings Firearms Model J-22 semi-automatic handgun, bearing serial number 056922, 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 Five of this Indictment;

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

COUNT SEVEN

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about August 15, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ROBERT L. BERRIOS, aka "Chazzo,"

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 .22 caliber Jennings Firearms Model J-22 semi-automatic handgun, bearing serial number 056922, which firearm had traveled in interstate commerce prior to the defendant's possession of the firearm;

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT EIGHT

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about September 2, 2012, at Chicago, in the Northern District of Illinois,
Eastern Division,

ROBERT L. BERRIOS, aka “Chazzo,”

defendant herein, did obstruct, delay, and affect “commerce,” as defined in Title 18, United States Code, Section 1951(b), and the movement of articles and commodities in commerce, by robbery, in that the defendant did unlawfully take and obtain a quantity of United States currency from the person and in the presence of an employee of a T-Mobile store, located at 5355 W. Diversey in Chicago, Illinois, against his 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 NINE

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about September 19, 2012, at Chicago, in the Northern District of Illinois,
Eastern Division,

ROBERT L. BERRIOS, aka “Chazzo,” and
JULIO RODRIGUEZ, aka “Jelly,”

defendants herein, did obstruct, delay, and affect “commerce,” as defined in Title 18, United States Code, Section 1951(b), and the movement of articles and commodities in commerce, by robbery, in that the defendants did unlawfully take and obtain a quantity of United States currency from the person and in the presence of an employee of a T-Mobile store, located at 1552 W. Chicago Avenue in Chicago, Illinois, against his will, by means of actual and threatened force, and fear of injury to that employee;

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

COUNT TEN

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about September 28, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ROBERT L. BERRIOS, aka "Chazzo,"

defendant herein, did obstruct, delay, and affect "commerce," as defined in Title 18, United States Code, Section 1951(b), and the movement of articles and commodities in commerce, by robbery, in that the defendant did unlawfully take and obtain a quantity of United States currency from the person and in the presence of an employee of a T-Mobile store, located at 1958 W. Irving Park in Chicago, Illinois, against his 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 ELEVEN

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about October 2, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ROBERT L. BERRIOS, aka "Chazzo," and
DAVID REVIS, aka "Red,

defendants herein, did obstruct, delay, and affect "commerce," as defined in Title 18, United States Code, Section 1951(b), and the movement of articles and commodities in commerce, by robbery, in that the defendants did unlawfully take and obtain a quantity of United States currency from the person and in the presence of an employee of a T-Mobile store, located at 4000 W. Fullerton in Chicago, Illinois, against his will, by means of actual and threatened force, and fear of injury to that employee;

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

COUNT TWELVE

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about October 13, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ROBERT L. BERRIOS, aka "Chazzo," and
JULIO RODRIGUEZ, aka "Jelly,"

defendants herein, did obstruct, delay, and affect "commerce," as defined in Title 18, United States Code, Section 1951(b), and the movement of articles and commodities in commerce, by robbery, in that the defendants did unlawfully take and obtain a quantity of United States currency from the person and in the presence of an employee of a T-Mobile store, located at 3951 N. Kimball in Chicago, Illinois, against her will, by means of actual and threatened force, and fear of injury to that employee;

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

COUNT THIRTEEN

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about October 13, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

JULIO RODRIGUEZ, aka "Jelly,"

defendant herein, did use, carry, and brandish a firearm, namely, a .22 caliber Jennings Firearms Model J-22 semi-automatic handgun, bearing serial number 056922, 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, Section 924(c)(1)(A).

COUNT FOURTEEN

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about October 13, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

JULIO RODRIGUEZ, aka "Jelly,"

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 .22 caliber Jennings Firearms Model J-22 semi-automatic handgun, bearing serial number 056922, 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).

COUNT FIFTEEN

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about October 16, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ROBERT L. BERRIOS, aka "Chazzo," and
JULIO RODRIGUEZ, aka "Jelly,"

defendants herein, did obstruct, delay, and affect "commerce," as defined in Title 18, United States Code, Section 1951(b), and the movement of articles and commodities in commerce, by robbery, in that the defendants did unlawfully take and obtain a quantity of United States currency from the person and in the presence of an employee of a Cricket store, located at 3200 W. Armitage in Chicago, Illinois, against his will, by means of actual and threatened force, and fear of injury to that employee;

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

COUNT SIXTEEN

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about October 22, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ROBERT L. BERRIOS, aka "Chazzo," and
JULIO RODRIGUEZ, aka "Jelly,"

defendants herein, did obstruct, delay, and affect "commerce," as defined in Title 18, United States Code, Section 1951(b), and the movement of articles and commodities in commerce, by robbery, in that the defendants did unlawfully take and obtain a quantity of United States currency from the person and in the presence of an employee of a AT&T store, located at 3935 W. Belmont in Chicago, Illinois, against his will, by means of actual and threatened force, and fear of injury to that employee;

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

COUNT SEVENTEEN

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about October 27, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ROBERT L. BERRIOS, aka “Chazzo,”

defendant herein, did obstruct, delay, and affect “commerce,” as defined in Title 18, United States Code, Section 1951(b), and the movement of articles and commodities in commerce, by robbery, in that the defendant did unlawfully take and obtain a quantity of United States currency from the person and in the presence of an employee of a T-Mobile store, located at 5355 W. Diversey in Chicago, Illinois, against his 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 EIGHTEEN

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about November 6, 2012, at Cicero, in the Northern District of Illinois, Eastern Division,

DAVID REVIS, aka "Red,"

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 .22 caliber Jennings Firearms Model J-22 semi-automatic handgun, bearing serial number 056922, which firearm had traveled in interstate commerce prior to the defendant's possession of the firearm;

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT NINETEEN

The SPECIAL AUGUST 2012 GRAND JURY further charges:

On or about December 17, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

JULIO RODRIGUEZ, aka "Jelly,"

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 ammunition, namely, 94 rounds of Blazer Ammunition, 22 Long Rifle, which ammunition 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 AUGUST 2012 GRAND JURY further alleges:

1. The allegations contained in this Indictment are 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 their violations of Title 18, United States Code, Section 922(g)(1), 924(c), and 1951(a) as alleged in the foregoing Indictment,

ROBERT L. BERRIOS, aka "Chazzo,"
JULIO RODRIGUEZ, aka "Jelly," and
DAVID REVIS, aka "Red,"

defendants 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 they 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) includes, but is not limited to (1) a .22 caliber Jennings Firearms Model J-22 semi-automatic handgun, bearing serial number 056922, and (2) 94 rounds of Blazer Ammunition, 22 Long Rifle;

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

ACTING UNITED STATES ATTORNEY