

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA            ) Case No. 14 CR 151  
  )  
v.    ) Violations: Title 18, United  
  ) States Code, Sections 922(g),  
JACOBI PICKETT and                    ) 924(c)(1)(A) and 1951(a)(1)  
TYREE CRAIG                            )

**COUNT ONE**

The SPECIAL MARCH 2013 Grand Jury charges:

1.     Beginning in or around October 2013, and continuing until on or about November 30, 2014, in the Northern District of Illinois, Eastern Division, and elsewhere,

JACOBI PICKETT and  
TYREE CRAIG,

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 JACOBI PICKETT and TYREE CRAIG agreed to rob various gas stations and retail stores and businesses in Chicago and surrounding suburbs in the Northern District of Illinois.

3. It was further part of the conspiracy that the defendants:

(a) obtained, possessed, and brandished, a firearm in connection with the commission of armed robberies;

(b) used cellular telephones to communicate with one another while planning and committing armed robberies;

(c) used vehicles for transportation to and from the location of armed robberies;

(d) concealed their identities by wearing hoods, masks and gloves and other items; and

(e) robbed gas stations, convenience stores and other commercial establishments of United States currency and Newport cigarettes at gunpoint.

4. It was further part of the conspiracy that JACOBI PICKETT and TYREE CRAIG 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 MARCH 2013 GRAND JURY further charges:

On or about October 20, 2013, at Lincolnwood, in the Northern District of Illinois, Eastern Division,

JACOBI PICKETT and  
TYREE CRAIG,

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 United States Currency from the person and in the presence of an employee of the Dunkin Donuts store, located at 3910 West Touhy Avenue in Lincolnwood, 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 MARCH 2013 GRAND JURY further charges:

On or about October 21, 2013, at North Chicago, in the Northern District of Illinois, Eastern Division,

JACOBI PICKETT and  
TYREE CRAIG,

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 United States currency and Newport cigarettes from the person and in the presence of an employee of the Phillips 66 gas station, located at 1234 Sheridan Road in North 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 FOUR**

The SPECIAL MARCH 2013 GRAND JURY further charges:

On or about October 21, 2013, at North Chicago, in the Northern District of Illinois, Eastern Division,

JACOBI PICKETT and  
TYREE CRAIG,

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, conspiracy affecting commerce in violation of Title 18, United States Code, Section 1951(a), as charged in Count One of this Indictment, and a robbery affecting commerce in violation of Title 18, United States Code, Section 1951(a), as charged in Count Three of this Indictment;

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

**COUNT FIVE**

The SPECIAL MARCH 2013 GRAND JURY further charges:

On or about October 21, 2013, at Skokie, in the Northern District of Illinois, Eastern Division,

JACOBI PICKETT and  
TYREE CRAIG,

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 United States currency from the person and in the presence of an employee of the Shell gas station, located at 9600 Crawford Avenue in Skokie, 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 SIX**

The SPECIAL MARCH 2013 GRAND JURY further charges:

On or about October 31, 2013, at Arlington Heights, in the Northern District of Illinois, Eastern Division,

JACOBI PICKETT and  
TYREE CRAIG,

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 United States currency and Newport cigarettes from the person and in the presence of an employee of the Shell gas station, located at 3 East Algonquin Road in Arlington Heights, 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 SEVEN**

The SPECIAL MARCH 2013 GRAND JURY further charges:

On or about October 31, 2013, at Glenview, in the Northern District of Illinois, Eastern Division,

JACOBI PICKETT and  
TYREE CRAIG,

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 United States currency and Newport cigarettes from the person and in the presence of an employee of the Marathon gas station, located at 242 Waukegan Road in Glenview, 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 EIGHT**

The SPECIAL MARCH 2013 GRAND JURY further charges:

On or about November 30, 2013, at Skokie, in the Northern District of Illinois, Eastern Division,

JACOBI PICKETT and  
TYREE CRAIG,

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 United States currency from the person and in the presence of an employee of the Shell gas station, located at 5055 Touhy Avenue in Skokie, 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 MARCH 2013 GRAND JURY further charges:

On or about November 30, 2013, at Wilmette, in the Northern District of Illinois, Eastern Division,

JACOBI PICKETT and  
TYREE CRAIG,

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 United States currency and Newport cigarettes from the person and in the presence of an employee of the Seven-Eleven store, located at 500 Skokie Boulevard in Wilmette, 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 TEN**

The SPECIAL MARCH 2013 GRAND JURY further charges:

On or about November 30, 2013, at Wilmette, in the Northern District of Illinois, Eastern Division,

JACOBI PICKETT and  
TYREE CRAIG,

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, conspiracy affecting commerce in violation of Title 18, United States Code, Section 1951(a), as charged in Count One of this Indictment, and a robbery affecting commerce in violation of Title 18, United States Code, Section 1951(a), as charged in Count Nine of this Indictment;

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

**COUNT ELEVEN**

The SPECIAL MARCH 2013 GRAND JURY further charges:

On or about December 13, 2013, at Chicago, in the Northern District of Illinois, Eastern Division,

TYREE CRAIG,

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 jewelry from the person and in the presence of an employee of the Ted’s Jewelers, located at 5334 South Archer 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, Section 1951(a).

**COUNT TWELVE**

The SPECIAL MARCH 2013 GRAND JURY further charges:

On or about February 19, 2014, at Hometown, in the Northern District of Illinois, Eastern Division,

JACOBI PICKETT,

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 jewelry from the person and in the presence of an employee of the EZ Pawn store, located at 4080 Southwest Highway in Hometown, 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 THIRTEEN**

The SPECIAL MARCH 2013 GRAND JURY further charges:

On or about March 27, 2014, at Chicago, in the Northern District of Illinois, Eastern Division,

JACOBI PICKETT,

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 Taurus PT908 9mm semi-automatic handgun, bearing a serial number TMK24495, and associated ammunition, 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 MARCH 2013 GRAND JURY further alleges:

1. The allegations contained in this Indictment are incorporated here 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,

JACOBI PICKETT and  
TYREE CRAIG,

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 property seized on or about March 27, 2014 including: (1) a Taurus PT908 9mm semi-automatic handgun, bearing a serial number TMK24495, and associated ammunition; and (2) a silver metal ring containing small and large translucent stones.

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

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY