

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA) Case No.: 14 CR 97
)
v.) Violations: Title 18, United
) States Code, Sections 922(g),
TYREE CRAIG and) 924(c)(1)(A) and 1951(a)(1)
JARRYL WILLIAMS)

COUNT ONE

The SPECIAL MARCH 2013 Grand Jury charges:

1. Beginning in or around January 2014, and continuing until on or about January 10, 2014, at Chicago and Berwyn, in the Northern District of Illinois, Eastern Division, and elsewhere,

TYREE CRAIG and
JARRYL WILLIAMS,

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 TYREE CRAIG,

JARRYL WILLIAMS and others agreed to rob a jewelry store in Berwyn located in the Northern District of Illinois.

3. It was further part of the conspiracy that the defendants:
 - (a) identified a jewelry store for the armed robbery;
 - (b) obtained intelligence on the targeted jewelry store before attempting to commit an armed robbery;
 - (c) obtained a sledge hammer in connection with the commission of the attempted armed robbery;
 - (d) obtained, possessed, and brandished, a firearm in connection with the commission of the attempted armed robbery;
 - (e) used cellular telephones to communicate with one another and with others while planning and attempting to commit the armed robbery;
 - (f) used a 2004 Pontiac Grand Prix for transportation to and from the location of the attempted armed robbery, and as a post from which to conduct counter surveillance during the attempted armed robbery;
 - (g) concealed their identities by wearing hoods, masks, gloves and other items; and
 - (h) attempted to rob the jewelry store of jewelry, watches and other items at gunpoint;

4. It was further part of the conspiracy that TYREE CRAIG and JARRYL WILLIAMS 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 January 10, 2014, at Berwyn, in the Northern District of Illinois, Eastern Division,

**TYREE CRAIG and
JARRYL WILLIAMS,**

defendants herein, did attempt to 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 attempt to take and obtain jewelry from the person and in the presence of an employee of the James and Williams Jewelers, located at 7020 West Cermak Road in Berwyn, 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 January 10, 2014, at Berwyn, in the Northern District of Illinois, Eastern Division,

TYREE CRAIG and
JARRYL WILLIAMS,

did use, carry, and brandish a firearm, namely, a Hi-Point .40 caliber Smith & Wesson semi-automatic handgun, bearing a partially obliterated serial number, 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 an attempted 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 MARCH 2013 GRAND JURY further charges:

On or about January 10, 2014, at Berwyn, in the Northern District of Illinois, Eastern Division,

JARRYL WILLIAMS,

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 Hi-Point .40 caliber Smith & Wesson semi-automatic handgun, bearing a partially 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 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,

TYREE CRAIG and
JARRYL WILLIAMS

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 Hi-Point .40 caliber Smith & Wesson semi-automatic handgun, bearing a partially obliterated serial number;

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