

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	No.
	)	
v.	)	Violations: Title 18, United States
	)	Code, Sections 371, 922(a)(1)(A),
	)	(a)(3), (g)(1), 924(a)(1)(D), (n)
	)	
WINSTON GERALDS,	)	
also known as "Worm,"	)	
MAURICE STRICKLAND,	)	
also known as "Reese"	)	

**COUNT ONE**

The SPECIAL MARCH 2013 GRAND JURY charges:

1. Beginning no later than in or around April 21, 2012, and continuing to on or about April 23, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

WINSTON GERALDS,  
also known as "Worm",

defendant herein, not being a licensed importer, manufacturer, or dealer, conspired with David Lewisbey and others known and unknown to commit an offense against the United States, namely, to willfully engage in the business of dealing in firearms, in violation of Section 922(a)(1)(A).

**The Manner and Means Used to Carry Out the Conspiracy**

2. It was part of the conspiracy that GERALDS and Lewisbey traveled to gun shows in Indiana in order to purchase firearms for re-sale in Chicago, Illinois.

3. It was further part of the conspiracy that GERALDS and Lewisbey arranged to sell the guns that were purchased in Indiana to individuals in Chicago, Illinois.

4. It was further part of the conspiracy that GERALDS and Lewisbey did sell guns

that were purchased in Indiana to individuals in Chicago, Illinois.

5. It was further part of the conspiracy that in order to avoid detection, GERALDS and Lewisbey did not complete paperwork to document the sale of the firearms to the customers in Chicago, Illinois.

6. It was further part of the conspiracy that GERALDS and others concealed and hid, and caused to be concealed and hidden, the existence of and acts done in furtherance of the conspiracy.

7. In furtherance of the conspiracy and to accomplish the objectives of the conspiracy, GERALDS and his co-conspirators committed the following overt acts, among others, in the Northern District of Illinois, and elsewhere:

(a) On or about April 21, 2012, GERALDS and Lewisbey traveled to Crown Point, Indiana and purchased guns.

(b) On or about April 21, 2012, GERALDS and Lewisbey traveled from Crown Point, Indiana, to Chicago, Illinois, with the guns that were purchased in Indiana.

(c) On or about April 22, 2012, GERALDS and Lewisbey traveled to Crown Point, Indiana, and then to Indianapolis, Indiana where they purchased guns.

(d) On or about April 22, 2012, GERALDS and Lewisbey traveled to Crown Point, Indiana, and back to Chicago, Illinois for a second time where they purchased more guns.

(e) On or about April 22, 2012, GERALDS and Lewisbey sold the guns they had purchased in Indiana to customers in Chicago, Illinois.

(f) On or about April 23, 2012, GERALDS and Lewisbey traveled to Indianapolis, Indiana, and purchased additional guns.

(g) On or about April 23, 2012, GERALDS and Lewisbey sold those guns to a

customer in Chicago, Illinois.

(h) From approximately April 21, 2012, to April 23, 2012, GERALDS and Lewisbey sold no fewer than 43 firearms in Chicago, Illinois.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

The SPECIAL MARCH 2013 GRAND JURY further charges:

Beginning no later than in or around April 21, 2012, and continuing until on or about April 23, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

WINSTON GERALDS,  
also known as "Worm",

defendant herein, not being a licensed importer, manufacturer, or dealer, did willfully engage in the business of dealing in firearms;

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

**COUNT THREE**

The SPECIAL MARCH 2013 GRAND JURY further charges:

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

WINSTON GERALDS,  
also known as “Worm”,

defendant herein, not being a licensed importer, manufacturer, dealer, or collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, willfully did transport into the State of Illinois, where he then resided, firearms having been purchased by the defendant outside of the State of Illinois;

In violation of Title 18, United States Code, Sections 922(a)(3), 924(a)(1)(D) and 2.

**COUNT FOUR**

The SPECIAL MARCH 2013 GRAND JURY further charges:

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

WINSTON GERALDS,  
also known as “Worm”,

defendant herein, did travel from Illinois to Indiana, with the intent to engage in the unlicensed dealing of firearms in violation of Title 18, United States Code, Section 922(a)(1)(A), and did acquire firearms in Indiana in furtherance of such purpose;

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

**COUNT FIVE**

The SPECIAL MARCH 2013 GRAND JURY further charges:

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

MAURICE STRICKLAND,  
also known as "Reese,"

defendant herein, previously having been convicted of a crime punishable by imprisonment for a  
term exceeding one year, did knowingly possess in and affecting commerce, a firearm, which  
had traveled in interstate commerce prior to defendant's possession of the firearm;

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

**COUNT SIX**

The SPECIAL MARCH 2013 GRAND JURY further charges:

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

WINSTON GERALDS,  
also known as "Worm,"

defendant herein, not being a licensed importer, manufacturer, dealer, or collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, willfully did transport into the State of Illinois, where he then resided, firearms having been purchased by the defendant outside of the State of Illinois;

In violation of Title 18, United States Code, Sections 922(a)(3), 924(a)(1)(D) and 2.

**COUNT SEVEN**

The SPECIAL MARCH 2013 GRAND JURY further charges:

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

WINSTON GERALDS,  
also known as "Worm,"

defendant herein, did travel from Illinois to Indiana, with the intent to engage in the unlicensed dealing of firearms in violation of Title 18, United States Code, Section 922(a)(1)(A), and did acquire firearms in Indiana in furtherance of such purpose;

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

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
UNITED STATES ATTORNEY