

FILED

OCT 31 2023

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

UNITED STATES OF AMERICA

v.

CHARLES LAWLER, and
TARANDLE LEE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Oct 31, 2023

23-CR-176

JUDGE GETTLEMAN

MAGISTRATE JUDGE FUENTES

No. 23 CR 176

Violations: Title 18, United States
Code, Sections 1951(a), 2113(a), and 2

SUPERSEDING INDICTMENT

COUNT ONE

The SPECIAL NOVEMBER 2022 GRAND JURY charges:

On or about September 22, 2021, at Naperville, in the Northern District of
Illinois, Eastern Division,

CHARLES LAWLER,

defendant herein, by intimidation, took from the person and presence of a bank
employee, money belonging to and in the care, custody, control, management, and
possession of BMO Harris Bank, located at 1795 S. Washington Street, Suite 101, in
Naperville, Illinois, the deposits of which were then insured by the Federal Deposit
Insurance Corporation;

In violation of Title 18, United States Code, Section 2113(a).

COUNT TWO

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about September 28, 2021, at Lisle, in the Northern District of Illinois,
Eastern Division,

CHARLES LAWLER, and
TARANDLE LEE,

defendants herein, by intimidation, took from the person and presence of a bank employee, money belonging to and in the care, custody, control, management, and possession of Old Second Bank, located at 3101 Ogden Avenue, in Lisle, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Sections 2113(a), and 2.

COUNT THREE

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about October 6, 2021, at Westmont, in the Northern District of Illinois,
Eastern Division,

CHARLES LAWLER, and
TARANDLE LEE,

defendants herein, by intimidation, took from the person and presence of a bank employee, money belonging to and in the care, custody, control, management, and possession of Bank Financial, located at 6301 West Fairview Avenue, in Westmont, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Section 2113(a), and 2.

COUNT FOUR

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about January 3, 2022, at Woodridge, in the Northern District of Illinois,
Eastern Division,

CHARLES LAWLER, and
TARANDLE LEE,

defendants herein, by intimidation, took from the person and presence of a bank employee, money belonging to and in the care, custody, control, management, and possession of BMO Harris Bank, located at 2413 75th Street, in Woodridge, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Sections 2113(a), and 2.

COUNT FIVE

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about April 14, 2022, at Downers Grove, in the Northern District of Illinois, Eastern Division,

CHARLES LAWLER and
TARANDLE LEE,

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 DuPage Credit Union, located at 725 Ogden Avenue, in Downers Grove, Illinois, against the employee’s 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.

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2022 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 1951(a) and 2113(a), as set forth in this Superseding Indictment, defendants shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).
2. The property to be forfeited includes, but is not limited to, a personal money judgment in the amount of approximately \$29,944.
3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code Section 853(p).

A TRUE BILL:

FOREPERSON

signed by Erika L. Csicsila on behalf of the
ACTING UNITED STATES ATTORNEY