

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JAYLAN WILLIAMS and
BRANDON CUNNINGHAM

Case No. 23 CR 554

Violations: Title 18, United States Code,
Sections 1951(a), 924(c)(1)(A), 924(j)(1),
and 922(g)(1)

Superseding Indictment

COUNT ONE

The SPECIAL NOVEMBER 2022 GRAND JURY charges:

1. Between on or about September 10, 2022 and continuing until on or about September 13, 2022, at Chicago, in the Northern District of Illinois, Eastern Division,

JAYLAN WILLIAMS and
BRANDON CUNNINGHAM,

defendants herein, did conspire with each other to obstruct, delay, and affect “commerce,” and the movement of articles and commodities in commerce, by “robbery,” that is, the robbery of Anthony Oliver, 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 defendants:

(a) identified Anthony Oliver as an individual whom they would rob;

- (b) obtained, purchased, possessed, brandished, and discharged a firearm in connection with the commission of the armed robbery;
- (c) utilized cellular telephones to communicate with one another while planning and committing the armed robbery; and
- (d) lured and forcibly detained Anthony Oliver for the purpose of robbing him;
- (e) robbed Anthony Oliver of property, including United States currency; and
- (f) during the course of the robbery, murdered Anthony Oliver.

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

COUNT TWO

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about September 13, 2022, at Chicago, in the Northern District of Illinois, Eastern Division,

JAYLAN WILLIAMS and
BRANDON CUNNINGHAM,

defendants herein, did 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 that the defendants did unlawfully take and obtain property from the person and in the presence of Anthony Oliver, against Anthony Oliver’s will, by means of actual and threatened force;

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

COUNT THREE

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about September 13, 2022, at Chicago, in the Northern District of Illinois, Eastern Division,

JAYLAN WILLIAMS and
BRANDON CUNNINGHAM,

defendants herein, did knowingly use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely robbery, 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 NOVEMBER 2022 GRAND JURY further charges:

On or about September 13, 2022, at Chicago, in the Northern District of Illinois, Eastern Division,

JAYLAN WILLIAMS and
BRANDON CUNNINGHAM,

defendants herein, in the course of a violation of Title 18, United States Code, Section 924(c), as charged in Count Three of this Indictment, caused the death of Anthony Oliver through the use of the firearm, which killing was murder, as defined in Title 18, United States Code, Section 1111(a);

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

COUNT FIVE

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about September 13, 2022, at Chicago, in the Northern District of Illinois, Eastern Division,

JAYLAN WILLIAMS,

defendant herein, knowing that he had 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 and ammunition, namely, a Glock model 31, bearing serial number LKN173, and three rounds of .357 caliber ammunition bearing the headstamp “X-TREME”, which firearm and ammunition had traveled in interstate and foreign commerce prior to defendant’s possession of the firearm and ammunition;

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

NOTICE OF SPECIAL FINDINGS

1. The allegations set forth in Counts Three and Four are incorporated here.
2. The defendants JAYLAN WILLIAMS and BRANDON CUNNINGHAM:
 - a. Were eighteen years of age or older at the time of the offense (Title 18, United States Code, Section 3591(a)(2));
 - b. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D)); and
 - c. Committed the offense in the expectation of the receipt of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(8)).

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY