

FILED

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DANNY ROLAND,
BRYCE JONES,
CHANDLER WILLIAMS,
DAQUAN BENS, and
TRISTIAN MILLER

Violations: Title 18, United States Code,
Sections 371 and 2113(b)

UNDER SEAL

1:22-cr-00622

Judge Joan H. Lefkow

Judge Jeffrey Cole

Cat. 2

COUNT ONE

The SPECIAL MAY 2022 GRAND JURY charges:

1. On or about March 12, 2022, the Federal Deposit Insurance Corporation insured the deposits of First Source Bank, which owned and operated an automated teller machine (“ATM”) located at 3395 Willowcreek Road, Portage, Indiana (the “First Source Bank ATM”).
2. On or about March 23, 2022, the Federal Deposit Insurance Corporation insured the deposits of Inland Bank, which owned and operated an ATM located at 5456 South LaGrange Road, Countryside, Illinois (the “Inland Bank ATM”).
3. On or about March 25, 2022, the Federal Deposit Insurance Corporation insured the deposits of Parkway Bank, which owned and operated an ATM located at 22W555 Butterfield Road, in Glen Ellyn, Illinois (the “Parkway Bank ATM”).
4. On or about March 30, 2022, the Federal Deposit Insurance Corporation insured the deposits of Grundy National Bank, which owned and operated an ATM

located at 103 East Center Street in Conrad, Iowa (the “Grundy National Bank ATM”).

5. On or about April 1, 2022, the Federal Deposit Insurance Corporation insured the deposits of First State Bank, which owned and operated an ATM located at 413 East Street in Lynnville, Iowa (the “First State Bank ATM”).

6. On or about April 1, 2022, the Federal Deposit Insurance Corporation insured the deposits of First Central State Bank, which owned and operated an ATM located at 1291 Eagle Ridge Road in LeClaire, Iowa (the “First Central State Bank ATM”).

7. On or about April 2, 2022, the Federal Deposit Insurance Corporation insured the deposits of Solon State Bank, which owned and operated an ATM located at 444 East State Street in Tiffin, Iowa (the “Solon State Bank ATM”).

8. On or about April 3, 2022, the Federal Deposit Insurance Corporation insured the deposits of Resource Bank, which owned and operated an ATM located at 280 East Lincoln Avenue in Hinckley, Iowa (the “Resource Bank ATM”).

9. Beginning on or around March 10, 2022 and continuing through on or about April 3, 2022, in the Northern District of Illinois and elsewhere,

DANNY ROLAND,
BRYCE JONES,
CHANDLER WILLIAMS,
DAQUAN BENS, and
TRISTIAN MILLER,

defendants herein, did knowingly conspire to take and carry away, with intent to steal or purloin, property and money having a value exceeding \$1,000 belonging to,

and in the care, custody, control, management, and possession of a bank, in violation of Title 18, United States Code, Section 2113(b).

Overview of the Conspiracy

10. It was part of the conspiracy that defendants ROLAND and JONES agreed with each other, and at times with WILLIAMS, BENS, and MILLER, to break into ATM machines in order to steal United States currency stored in the ATM, including the First Source Bank ATM, the Inland Bank ATM, the Parkway Bank ATM, the Grundy National Bank ATM, the First State Bank ATM, the First Central Bank ATM, the Solon State Bank ATM, and the Resource Bank ATM.

11. It was further part of the conspiracy that defendants ROLAND, JONES, WILLIAMS, BENS, and MILLER attempted to and did conceal and hide the existence, purposes, and acts done in furtherance of the conspiracy.

Overt Acts

12. In furtherance of, and to effect the object of, the conspiracy, defendants committed and caused to be committed the following overt acts, among others, in the Northern District of Illinois and elsewhere:

a. On or about March 12, 2022, defendants ROLAND, JONES, and WILLIAMS traveled to a car dealership in Portage, Indiana, to steal a pick-up truck to use in the robbery.

b. On or about March 12, 2022, defendants ROLAND and JONES stole a pick-up truck from a car dealership in Portage, Indiana.

c. On or about March 12, 2022, defendants ROLAND and JONES used a chain connected to a stolen pick-up truck and attached to the First Source Bank ATM to break into the ATM and steal the United States currency stored in the ATM.

d. On or about March 12, 2022, defendant WILLIAMS met defendants ROLAND and JONES near the First Source Bank ATM to drive away from an abandoned, stolen pick-up truck.

e. On or about March 21, 2022, defendant JONES obtained materials to break into an ATM, including a 20 foot chain and 36 inch bolt cutters, from Hardware Store A in Chicago, Illinois.

f. On or about March 23, 2022, defendants ROLAND and JONES used a chain connected to a stolen pick-up truck and attached to the Inland Bank ATM to break into the ATM and steal the United States currency stored in the ATM.

g. On or about March 23, 2022, defendant BENS met defendants ROLAND and JONES near the Inland Bank ATM to drive away from an abandoned, stolen pick-up truck.

h. On or about March 24, 2022, defendant ROLAND obtained materials to break into an ATM, including a 20 foot chain, from Hardware Store A in Burbank, Illinois.

i. On or about March 25, 2022, defendants ROLAND and JONES used a chain connected to a stolen pick-up truck and attached to the Parkway Bank ATM to break into the ATM and steal the United States currency stored in the ATM.

j. On or about March 25, 2022, defendant MILLER met defendants ROLAND and JONES near the Parkway Bank ATM to drive defendants away from an abandoned, stolen pick-up truck.

k. On or about March 30, defendant ROLAND obtained materials to break into an ATM, including a 20 foot chain, from Hardware Store A in Burbank.

l. On or about March 30, 2022, defendants ROLAND and JONES used a chain connected to a stolen pick-up truck and attached to the Grundy National Bank ATM to attempt to break into the ATM and steal the United States currency stored in the ATM.

m. On or about March 30, 2022, defendant MILLER met defendants ROLAND and JONES near the Grundy National Bank ATM to drive away from an abandoned, stolen pick-up truck.

n. On or about March 31, defendant JONES obtained materials to break into an ATM, including a 20 foot chain, from Hardware Store A in Burbank.

o. On or about April 1, 2022, defendants ROLAND and JONES used a chain connected to a stolen pick-up truck and attached to the First State Bank ATM to break into the ATM and steal the United States currency stored in the ATM.

p. On or about April 1, 2022, defendant MILLER met defendants ROLAND and JONES near the First State Bank ATM to drive away from an abandoned, stolen pick-up truck.

q. On or about April 1, 2022, defendants ROLAND and JONES used a chain connected to a stolen pick-up truck and attached to the First Central State

Bank ATM to attempt to break into the ATM and steal the United States currency stored in the ATM.

r. On or about April 1, 2022, defendant MILLER met defendants ROLAND and JONES near the First Central State Bank ATM to drive away from an abandoned, stolen pick-up truck.

s. On or about April 1, defendant ROLAND obtained materials to break into an ATM, including crowbars, from Hardware Store B in Moline, Illinois.

t. On or about April 2, 2022, defendants ROLAND and JONES used a chain connected to a stolen pick-up truck and attached to the Solon State Bank ATM to attempt to break into the ATM and steal the United States currency stored in the ATM.

u. On or about April 2, 2022, defendant MILLER met defendants ROLAND and JONES near the Solon State Bank ATM to drive away from an abandoned, stolen pick-up truck.

v. On or about April 2, 2022, defendant ROLAND obtained materials to break into an ATM, including crowbars, from Hardware Store B in Yorkville, Illinois.

w. On or about April 3, 2022, defendants ROLAND and JONES used a chain connected to a stolen pick-up truck and attached to the Resource Bank ATM to attempt to break into the ATM and steal the United States currency stored in the ATM.

13. On or about April 1, 2022, defendant MILLER met defendants ROLAND and JONES near the Resource Bank ATM to drive away from an abandoned, stolen pick-up truck;

In violation of Title 18, United States Code, Section 371.

COUNT TWO

The SPECIAL MAY 2022 GRAND JURY further charges:

On or about March 23, 2022, at Countryside, in the Northern District of Illinois,

DANNY ROLAND,
BRYCE JONES, and
DAQUAN BENS,

defendants herein, did take and carry away, with intent to steal and purloin, United States currency having a value exceeding \$1,000 belonging to and in the care, custody, control, management, and possession of Inland Bank, 5456 South LaGrange Road, Countryside, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

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

COUNT THREE

The SPECIAL MAY 2022 GRAND JURY further charges:

On or about March 25, 2022, at Glen Ellyn, in the Northern District of Illinois,

DANNY ROLAND,
BRYCE JONES, and
TRISTIAN MILLER,

defendants herein, did take and carry away, with intent to steal and purloin, United States currency having a value exceeding \$1,000 belonging to and in the care, custody, control, management, and possession of Parkway Bank, 22W555 Butterfield Road, Glen Ellyn, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

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

FORFEITURE ALLEGATION

The SPECIAL MAY 2022 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 371 and 2113(b), as set forth in this Indictment, defendants shall forfeit to the United States of America any property of which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Sections 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.
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

Erika L. Csicsila on behalf of the
UNITED STATES ATTORNEY