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Judge Robert W. Gettleman Magistrate Judge Jeffrey Cole CAT. 3

THOMAS G. BRUTON CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

KSR

UNITED STATES OF AMERICA

DARRELL SINGLETON a/k/a "Bay

ELIJAH SINGLETON a/k/a "LilBlast,"

ANTHONY WILSON a/k/a "Ba," AVEON WILSON a/k/a "Av."

BRIAN SNYDER a/k/a "BJ" and

and WILLIAM COCHRAN a/k/a "Lil

JUSTIN CAIN a/k/a "JusBlo," PERRY MAPLE a/k/a "Mook,"

v.

DEVONTE DAVIS a/k/a "6."

Bay" and "Spank," CORRIE SINGLETON,

"Drills,"

Will"

Case No. 22-CR-574

Violations: Title 18, United States Code, Sections 1951(a)(1), 2119, and 924(c)(1)(A)

SECOND SUPERSEDING INDICTMENT

UNDER SEAL

COUNT ONE

The SPECIAL JANUARY 2023 GRAND JURY charges:

1. Beginning on or about October 31, 2022 and continuing until on or about

November 17, 2023, in the Northern District of Illinois, Eastern Division,

DEVONTE DAVIS a/k/a "6," DARRELL SINGLETON a/k/a "Bay Bay" or "Spank," CORRIE SINGLETON, ELIJAH SINGLETON a/k/a "LilBlast," ANTHONY WILSON a/k/a "Ba," AVEON WILSON a/k/a "Av," BRIAN SNYDER a/k/a "BJ" or "Drills," JUSTIN CAIN a/k/a "JusBlo," PERRY MAPLE a/k/a "Mook," and WILLIAM COCHRAN a/k/a "Lil Will"

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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 defendants DEVONTE DAVIS, DARRELL SINGLETON, CORRIE SINGLETON, ELIJAH SINGLETON, ANTHONY WILSON, AVEON WILSON, BRIAN SNYDER, JUSTIN CAIN, PERRY MAPLE, and WILLIAM COCHRAN, and others known and unknown to the Grand Jury, agreed to rob armored trucks and ATM technicians at multiple locations in the Northern District of Illinois resulting in the loss of at least \$3,815,964 in U.S. currency.

3. It was part of the conspiracy that defendants DEVONTE DAVIS, DARRELL SINGLETON, CORRIE SINGLETON, ELIJAH SINGLETON, ANTHONY WILSON, AVEON WILSON, BRIAN SNYDER, JUSTIN CAIN, PERRY MAPLE, and WILLIAM COCHRAN, and others known and unknown to the Grand Jury, obtained, possessed, and brandished firearms in connection with the robberies.

4. It was further part of the conspiracy that defendants committed the robberies and attempted robbery identified in Counts 2, 4, 6, 8, 10, 12, 14, 16, 18, 20, and 23 in furtherance of the conspiracy.

5. It was further part of the conspiracy that, on October 2, 2023, in order to facilitate escape from the October 2, 2023, attempted armed robbery of a Loomis

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employee, as charged in Count Twenty, defendants ELIJAH SINGLETON and COCHRAN committed an armed carjacking, as charged in Count Twenty-One.

6. It was further part of the conspiracy that defendants, and others known and unknown to the Grand Jury, committed armed robberies on December 29, 2022 in Country Club Hills, Illinois and on March 27, 2023 in Calumet City, Illinois.

7. It was further part of the conspiracy that defendants DEVONTE DAVIS, DARRELL SINGLETON, CORRIE SINGLETON, ELIJAH SINGLETON, ANTHONY WILSON, AVEON WILSON, BRIAN SNYDER, JUSTIN CAIN, PERRY MAPLE, and WILLIAM COCHRAN, and others known and unknown to the Grand Jury, did conceal and hide, and cause to be concealed and hidden, the purposes of acts done in furtherance of the conspiracy.

COUNT TWO

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about October 31, 2022, in Lansing, in the Northern District of Illinois, Eastern Division, and elsewhere,

CORRIE SINGLETON and DARRELL SINGLETON,

defendants herein, and others known and unknown to the Grand Jury, 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 cash from the person and in the presence of an employee of Brink's, while that employee was located at approximately 16767 Torrence Avenue, in Lansing, Illinois, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT THREE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about October 31, 2022, in Lansing, in the Northern District of Illinois, Eastern Division, and elsewhere,

CORRIE SINGLETON and DARRELL SINGLETON,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Two of this Second Superseding Indictment;

COUNT FOUR

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about February 5, 2023, in Country Club Hills, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRIAN SNYDER and ELIJAH SINGLETON,

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 cash from the person and in the presence of an employee of GardaWorld, while that person was located at approximately 4200 W 167th Street in Country Club Hills, Illinois, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT FIVE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about February 5, 2023, in Country Club Hills, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRIAN SNYDER and ELIJAH SINGLETON,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Four of this Second Superseding Indictment;

COUNT SIX

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about February 24, 2023, in Calumet City, in the Northern District of Illinois, Eastern Division, and elsewhere,

PERRY MAPLE,

defendant 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 defendant did unlawfully take and obtain cash from the person and in the presence of an ATM service technician, while that technician was located at approximately 1779 River Oaks Drive, in Calumet City, Illinois, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT SEVEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about February 24, 2023, in Calumet City, in the Northern District of Illinois, Eastern Division, and elsewhere,

PERRY MAPLE,

defendant herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Six of this Second Superseding Indictment;

COUNT EIGHT

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about March 4, 2023, in Orland Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

PERRY MAPLE and AVEON WILSON,

defendants herein, and others known and unknown to the Grand Jury, 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 cash from the person and in the presence of an ATM service technician, while that technician was located at approximately 14225 95th Avenue, in Orland Park, Illinois, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT NINE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about March 4, 2023, in Orland Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

PERRY MAPLE and AVEON WILSON,

defendants herein, and others known and unknown to the Grand Jury, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Eight of this Second Superseding Indictment;

COUNT TEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about April 12, 2023, in Calumet City, in the Northern District of Illinois, Eastern Division, and elsewhere,

ANTHONY WILSON and DARRELL SINGLETON,

defendants herein, and others known and unknown to the Grand Jury, 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 cash from the person and in the presence of an employee of Brink's, while that employee was located at 1968 Sibley Boulevard in Calumet City, Illinois, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT ELEVEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about April 12, 2023, in Calumet City, in the Northern District of Illinois, Eastern Division, and elsewhere,

ANTHONY WILSON and DARRELL SINGLETON,

defendant herein, and others known and unknown to the Grand Jury, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Ten of this Second Superseding Indictment;

COUNT TWELVE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about April 12, 2023, in Lansing, in the Northern District of Illinois, Eastern Division, and elsewhere,

ANTHONY WILSON and DARRELL SINGLETON,

defendants herein, and others known and unknown to the Grand Jury, 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 cash from the person and in the presence of an employee of Loomis, while that employee was located in the 2300 block of 173rd Street in Lansing, Illinois, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT THIRTEEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about April 12, 2023, in Lansing, in the Northern District of Illinois, Eastern Division, and elsewhere,

ANTHONY WILSON and DARRELL SINGLETON,

defendants herein, and others known and unknown to the Grand Jury, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Twelve of this Second Superseding Indictment;

COUNT FOURTEEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about May 2, 2023, in Homewood, in the Northern District of Illinois, Eastern Division, and elsewhere,

DEVONTE DAVIS and DARRELL SINGLETON,

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 cash from the person and in the presence of an employee of Brink's, while that employee was located at 3153 183rd Street in Homewood, Illinois, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT FIFTEEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about May 2, 2023, in Homewood, in the Northern District of Illinois, Eastern Division, and elsewhere,

DEVONTE DAVIS and DARRELL SINGLETON,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Fourteen of this Second Superseding Indictment;

COUNT SIXTEEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about August 23, 2023, in Blue Island, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRIAN SNYDER and JUSTIN CAIN,

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 cash from the person and in the presence of an ATM technician, while that employee was located at 11960 Western Avenue in Blue Island, Illinois, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT SEVENTEEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about August 23, 2023, in Blue Island, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRIAN SNYDER and JUSTIN CAIN,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Sixteen of this Second Superseding Indictment;

COUNT EIGHTEEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about September 19, 2023, in Chicago Heights, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRIAN SNYDER, ANTHONY WILSON, and JUSTIN CAIN,

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 cash from the person and in the presence of an employee of Loomis, while that employee was located at 1333 Western Avenue in Chicago Heights, Illinois, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT NINETEEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about September 19, 2023, in Chicago Heights, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRIAN SNYDER, ANTHONY WILSON, and JUSTIN CAIN,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Eighteen of this Second Superseding Indictment;

COUNT TWENTY

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about October 2, 2023, in Country Club Hills, in the Northern District of Illinois, Eastern Division, and elsewhere,

ELIJAH SINGLETON and WILLIAM COCHRAN

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 defendant did unlawfully attempt to take and obtain cash from the person and in the presence of an employee of Loomis, while that employee was located at 4005 W 167th Street in Country Club Hills, Illinois, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT TWENTY-ONE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about October 2, 2023, in Country Club Hills, in the Northern District of Illinois, Eastern Division, and elsewhere,

ELIJAH SINGLETON and WILLIAM COCHRAN

defendants herein, and others known and unknown to the Grand Jury, with intent to cause death and serious bodily harm, took a motor vehicle, namely, a 2016 Chevy Impala, that had been transported, shipped, and received in interstate commerce, from the person and presence of Victim A by force, violence, and intimidation;

COUNT TWENTY-TWO

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about October 2, 2023, in Country Club Hills, in the Northern District of Illinois, Eastern Division, and elsewhere,

ELIJAH SINGLETON and WILLIAM COCHRAN

defendants herein, and others known and unknown to the Grand Jury, did use, carry, and brandish 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, carjacking, in violation of Title 18, United States Code, Section 2119, as charged in Count Twenty-One of this Second Superseding Indictment;

COUNT TWENTY-THREE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about November 17, 2023, in Chicago Heights, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRIAN SNYDER,

defendant herein, and others known and unknown to the Grand Jury, 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 cash from the person and in the presence of an employee of Loomis, while that employee was located at 1333 Western Avenue in Chicago Heights, Illinois, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

COUNT TWENTY-FOUR

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about November 17, 2023, in Chicago Heights, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRIAN SNYDER,

defendant herein, and others known and unknown to the Grand Jury, did use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Twenty-Three of this Second Superseding Indictment;

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2023 GRAND JURY further alleges:

1. The allegations contained in this Second Superseding 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, Sections 924(c)(1)(A), 2119, 1951(a), as alleged in the foregoing Second Superseding Indictment,

DEVONTE DAVIS DARRELL SINGLETON, CORRIE SINGLETON, ELIJAH SINGLETON, ANTHONY WILSON, AVEON WILSON, BRIAN SNYDER, JUSTIN CAIN, PERRY MAPLE, and WILLIAM COCHRAN

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 defendants subject to forfeiture pursuant to Title 18 United States Code, Section 924(d)(1) and Title 28, United States Code, Section

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2461(c), includes but is not limited to property seized on or about April 14, 2023, June 8, 2023, September 21, 2023, and December 6, 2023, including:

- a. A Smith & Wesson 9 mm pistol bearing serial number RFD5732 and associated ammunition;
- b. An FN 509 pistol bearing serial number BUS15732 and associated ammunition;
- c. A Glock 43 pistol bearing serial number ADZZ847 and associated ammunition;
- d. A Century Arms pistol bearing serial number SV7085796 and associated ammunition;
- e. A Sig Saur P320 pistol bearing serial number M18A006934 and associated ammunition;
- f. A Glock 19 Gen 5 9 mm pistol bearing serial number G131184 and associated ammunition;
- g. A Glock 20 Gen 4 10 mm pistol bearing serial number BXZM956 and associated ammunition;
- h. An Anderson AM-15 rifle bearing serial number 21442879 and associated ammunition;
- i. An AK-style .22 caliber rifle bearing serial number RA0035187 and associated ammunition;
- j. A Glock 19X pistol bearing serial number BUYZ692 and associated ammunition;

- k. A Glock 17 Gen 5 pistol bearing serial number BVGE344 and associated ammunition;
- A Glock 17 C pistol bearing serial number AHPH012 and associated ammunition;
- m. A miniature Draco pistol bearing serial number ROA23PMD-42743 and associated ammunition;
- n. An AM-15 rifle bearing serial number 20388614 and associated ammunition;
- o. A Diamondback 15 5.56 mm rifle bearing serial number DB2900043 and associated ammunition;
- p. A Glock 19 pistol bearing serial number BXGF514 and associated ammunition;
- q. A Glock 17 pistol bearing serial number BWPZ327 and associated ammunition;
- r. A sealed bag of Georgia Arms .357 Sig 125 ammunition;
- s. Two boxes of federal .45 caliber ammunition;
- t. Three boxes of Magtech .40 caliber Smith & Wesson ammunition;
- u. One box of Ammo Incorporated .40 caliber Smith & Wesson ammunition;

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY