

FILED
8/14/2024

KSR

Judge Steven C. Seeger
Magistrate Judge Heather K. McShain
RANDOM/CAT. 3

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CHRISTOPHER YATES

Case No. 24 CR 357

Violations: Title 18, United States Code,
Sections 924(h) and 1958(a)

COUNT ONE

The SPECIAL APRIL 2024 GRAND JURY charges:

From on or about July 5, 2024 through on or about July 30, 2024, at Oak Lawn,
in the Northern District of Illinois, Eastern Division, and elsewhere,

CHRISTOPHER YATES,

defendant herein, knowingly used and caused another to use a facility of interstate commerce, namely, a cellular telephone, a 2019 black Dodge Charger automobile bearing Illinois license plate EJ21443, and WhatsApp instant messaging service, with intent that a murder be committed, in violation of the laws of the State of Illinois, namely, the murder of Individual A, which murder was to be committed as consideration for a promise and agreement to pay anything of pecuniary value;

In violation of Title 18, United States Code, Section 1958(a).

COUNT TWO

The SPECIAL APRIL 2024 GRAND JURY further charges:

From on or about July 5, 2024 through on or about July 30, 2024, at Oak Lawn, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHRISTOPHER YATES,

defendant herein, knowingly used and caused another to use a facility of interstate commerce, namely, a cellular telephone, a 2019 black Dodge Charger automobile bearing Illinois license plate EJ21443, and WhatsApp instant messaging service, with intent that a murder be committed, in violation of the laws of the State of Illinois, namely, the murder of Individual B, which murder was to be committed as consideration for a promise and agreement to pay anything of pecuniary value;

In violation of Title 18, United States Code, Section 1958(a).

COUNT THREE

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about July 9, 2024, at Oak Lawn, in the Northern District of Illinois,
Eastern Division,

CHRISTOPHER YATES,

defendant herein, knowingly transferred a firearm and ammunition, namely a Smith
& Wesson .38 caliber revolver, bearing serial number BEF6088 and 5 rounds of
Hornady .38 caliber special ammunition, knowing and having reasonable cause to
believe that such firearm and ammunition would be used to commit a felony, namely,
murder, in violation of the laws of the State of Illinois;

In violation of Title 18, United States Code, Section 924(h).

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY