

FILED
12/9/2024
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT
MEN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

KAHD AFFIE GREEN,
JAHJUAN GREEN,
CHAQWON BIRDEN, and
MARQUISE RAMYYEH

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

1:24-cr-00566
Judge Rebecca R. Pallmeyer
Magistrate Judge Jeffrey Cole
RANDOM / CAT.4

COUNT ONE

The SPECIAL NOVEMBER 2023 GRAND JURY charges:

1. On or about December 6, 2023, in the Northern District of Illinois,
Eastern Division, and elsewhere,

KAHD AFFIE GREEN,
JAHJUAN GREEN,
CHAQWON BIRDEN, and
MARQUISE RAMYYEH,

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 the defendants KAHD AFFIE GREEN,
JAHJUAN GREEN, CHAQWON BIRDEN, and MARQUISE RAMYYEH, and others
known and unknown to the Grand Jury, agreed to rob employees of Meade Electrical

Company located at approximately East 97th Street and South Doctor Martin Luther King Junior Drive in the Northern District of Illinois.

3. It was further part of the conspiracy that the defendants:
 - a. identified a location for the armed robbery and conducted surveillance of the targeted location;
 - b. conducted internet searches to determine the resale value of electrical equipment;
 - c. obtained, possessed and brandished firearms in connection with the commission of the armed robbery;
 - d. used cellular telephones to communicate with one another while planning the robbery;
 - e. used a vehicle for transportation to and from the location of the robbery, including a 2014 Jeep Grand Cherokee;
 - f. concealed their identities by wearing hoods, ski masks and other items; and
 - g. robbed Meade Electric Company employees of a RIDGID camera and a Digitrak locator box at gunpoint.

4. It was further part of the conspiracy that KAHDAFFIE GREEN, JAHJUAN GREEN, CHAQWON BIRDEN, and MARQUISE RAMYYEH would and did conceal and hide, and cause to be concealed and hidden, the purposes of acts done in furtherance of the conspiracy.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about December 6, 2023, at Chicago, in the Northern District of Illinois, Eastern Division and elsewhere,

KAHDAFFIE GREEN,
JAHJUAN GREEN,
CHAQWON BIRDEN, and
MARQUISE RAMYYEH,

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 a RIDGID camera and a Digitrak locator box from the person and in the presence of an employee of Meade Electric Company, in the vicinity of of East 97th Street and South Doctor Martin Luther King Junior Drive in Chicago, Illinois, against his will, by means of an actual and threatened force, and fear of injury to that employee;

In violation of Title 18, United States Code, Section 1951(a).

COUNT THREE

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about December 6, 2023, at Chicago, in the Northern District of Illinois,
Eastern Division and elsewhere,

KAHDAFFIE GREEN,
JAHJUAN GREEN,
CHAQWON BIRDEN, and
MARQUISE RAMYYEH,

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 Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FOUR

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about December 6, 2023, at Chicago, in the Northern District of Illinois, Eastern Division and elsewhere,

KAHDAFFIE GREEN,

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 and foreign commerce, a firearm that had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT FIVE

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about December 6, 2023, at Chicago, in the Northern District of Illinois, Eastern Division and elsewhere,

MARQUISE RAMYYEH,

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 and foreign commerce, a firearm that had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2023 GRAND JURY further alleges:

1. The allegations contained in this 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 922(g)(1), 924(c)(1)(A), and 1951(a) as alleged in the foregoing Indictment,

KAHD AFFIE GREEN,
JAHJUAN GREEN,
CHAQWON BIRDEN, and
MARQUISE RAMYYEH,

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 2461(c), includes but is not limited to property seized on or about December 6, 2023, including:

- a. a Smith & Wesson Model M&P-15 semiautomatic rifle, bearing serial number TT26491, and associated ammunition;
- b. a Glock Model 26 Gen 5 semiautomatic pistol, bearing serial number AHLA201, and associated ammunition; and

- c. a Glock Model 30 Gen 4 semiautomatic pistol, bearing serial number BMBW587, and associated ammunition.

A TRUE BILL:

FOREPERSON

Acting UNITED STATES ATTORNEY