

FILED
4/17/2025
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JAMARI EDWARDS

No. 24 CR 186

Judge Lindsay C. Jenkins

PLEA AGREEMENT

1. This Plea Agreement between the United States Attorney for the Northern District of Illinois, ANDREW S. BOUTROS, and defendant JAMARI EDWARDS, and his attorney, CHRISTOPHER HOTALING, is made pursuant to Rule 11 of the Federal Rules of Criminal Procedure and is governed in part by Rule 11(c)(1)(A), as more fully set forth below. The parties to this Agreement have agreed upon the following:

Charges in This Case

2. The indictment in this case charges defendant with carjacking, in violation of Title 18, United States Code, Section 2119 (Counts 1, 3, and 5); using, brandishing, and discharging a firearm during and in relation to a crime of violence, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i) (Count 2); and using and brandishing a firearm during and in relation to a crime of violence, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i) (Counts 4 and 6).

3. Defendant has read the charges against him contained in the indictment, and those charges have been fully explained to him by his attorney.

4. Defendant fully understands the nature and elements of the crimes with which he has been charged.

Charges to Which Defendant Is Pleading Guilty

5. By this Plea Agreement, defendant agrees to enter a voluntary plea of guilty to the following counts of the indictment: Count 1, which charges defendant with carjacking, in violation of Title 18, United States Code, Section 2119; Count 2, which charges defendant with discharging a firearm during and in relation to a crime of violence, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i); Count 3, which charges defendant with carjacking, in violation of Title 18, United States Code, Section 2119; Count 4, which charges defendant with brandishing a firearm during and in relation to a crime of violence, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i); and Count 5, which charges defendant with carjacking, in violation of Title 18, United States Code, Section 2119.

Factual Basis

6. Defendant will plead guilty because he is in fact guilty of the charges contained in Counts 1, 2, 3, 4, and 5 of the indictment. In pleading guilty, defendant admits the following facts and that those facts establish his guilt beyond a reasonable doubt:

With respect to Counts 1 and 2:

On or about August 6, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, defendant with intent to cause death and serious bodily harm, took

a motor vehicle, namely, a 2013 Honda Civic, that had been transported, shipped, and received in interstate and foreign commerce from the person and presence of Victim A by force, violence, and intimidation, in violation of Title 18, United States Code, Section 2119.

On or about August 6, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, defendant did use, carry, brandish, and discharge 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, carjacking, in violation of Title 18, United States Code, Section 924(c)(1)(A).

Specifically, on August 6, 2022, while Victim A was seated in the driver's seat of his 2013 Honda Civic in a drive thru of a coffee shop in the 7100 block of South Ashland Avenue, defendant entered the car from the front passenger side, pointed a firearm at Victim A, forced Victim A out of his car at gunpoint, and got into the driver's seat. As Victim A started walking away, defendant asked Victim A why he was not scared, and then shot Victim A in the leg. Defendant acknowledges Victim A sustained serious bodily injury, which involved extreme physical pain and resulted in Victim A's hospitalization, from the gunshot wound to his leg. After defendant shot Victim A, defendant started pulling away in Victim A's car, stopped, got out of the car, ran toward Victim A with the gun still in his hand, and frisked Victim A. Defendant took Victim A's phone and wallet, got back in Victim A's car and drove away.

Defendant acknowledges that the 2013 Honda Civic had been transported, shipped, and received, in interstate commerce prior to defendant taking it.

With respect to Counts 3 and 4:

On or about August 8, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, defendant with intent to cause death and serious bodily harm, took a motor vehicle, namely, a 2020 Dodge Journey Crossroad, that had been transported, shipped, and received in interstate and foreign commerce from the person and presence of Victim B by force, violence, and intimidation, in violation of Title 18, United States Code, Section 2119.

On or about August 8, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, defendant 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, carjacking, in violation of Title 18, United States Code, Section 924(c)(1)(A).

Specifically, on August 8, 2022, Victim B parked his 2020 Dodge Journey Crossroad in front of a convenience store at a gas station, located in the 1500 block of West 71st Street, and went inside. As Victim B was on his way back to his car, defendant ran towards Victim B with a gun pointed at Victim B. Defendant frisked Victim B's pockets looking for his keys, and stole Victim B's phone and wallet. Defendant could not find the keys, so he grabbed Victim B by his shirt and pulled him

to the car to look for them. Defendant found them on the ground, got in Victim B's car, and drove away.

Defendant acknowledges that the 2020 Dodge Journey Crossroad had been transported, shipped, and received, in interstate commerce prior to defendant taking it.

With respect to Count 5:

On or about August 13, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, defendant with intent to cause death and serious bodily harm, took a motor vehicle, namely, a 2015 Jeep Cherokee, that had been transported, shipped, and received in interstate and foreign commerce from the person and presence of Victim C by force, violence, and intimidation.

Specifically, on August 13, 2022, Victim C parked in front of a convenience store at a gas station, located in the 1500 block of West 71st Street, and sat in the car while the passenger went into the store. While Victim C was seated in her car, defendant and Individual 1 approached her car. Defendant went to the driver's side and Individual 1 opened up the front passenger door. Defendant pointed a gun at of Victim C's head. Victim C pushed the gun away, and defendant pointed the gun back at Victim C's head and said words to the effect of, "get out of the fucking car before I blow your brains out." Defendant was yelling at Victim C to get out of the car, but Victim C did not get out of the car, so defendant pulled Victim C out of the car by her

necklace, breaking the necklace Defendant stole Victim C's necklace, purse, wallet, phone, and drove away in her car.

Defendant acknowledges that the 2015 Jeep Cherokee had been transported, shipped, and received, in interstate commerce prior to defendant taking it.

Maximum Statutory Penalties

7. Defendant understands that the charges to which he is pleading guilty carry the following statutory penalties:

a. Counts 1, 3, and 5 each carry a maximum sentence of 15 years' imprisonment. Counts 1, 3, and 5 also carry a maximum fine of \$250,000. Defendant further understands that, with respect to Counts 1, 3, and 5, the judge also may impose a term of supervised release of not more than three years.

b. Count 2 carries a maximum sentence of life imprisonment, and a statutory mandatory minimum sentence of 10 years. The sentence of imprisonment on Count 2 is required to be consecutive to any other sentence imposed. Pursuant to Title 18, United States Code, Section 3561, defendant may not be sentenced to a term of probation on this count. Count 2 also carries a maximum fine of \$250,000. Defendant further understands that with respect to Count 2, the judge also may impose a term of supervised release of not more than five years.

c. Count 4 carries a maximum sentence of life imprisonment, and a statutory mandatory minimum sentence of 7 years. The sentence of imprisonment on Count 2 is required to be consecutive to any other sentence imposed. Pursuant to Title

18, United States Code, Section 3561, defendant may not be sentenced to a term of probation on this count. Count 4 also carries a maximum fine of \$250,000. Defendant further understands that with respect to Count 4, the judge also may impose a term of supervised release of not more than five years.

d. Defendant further understands that the Court must order restitution to the victims of the offense in an amount determined by the Court.

e. Pursuant to Title 18, United States Code, Section 3013, defendant will be assessed \$100 on each count to which he has pled guilty, in addition to any other penalty or restitution imposed.

f. Therefore, under the counts to which defendant is pleading guilty, the total maximum sentence is life imprisonment, and the minimum sentence is 17 years' imprisonment. In addition, defendant is subject to a total maximum fine of \$1,250,000, a period of supervised release, and special assessments totaling \$500, in addition to any restitution ordered by the Court.

Sentencing Guidelines Calculations

8. Defendant understands that, in determining a sentence, the Court is obligated to calculate the applicable Sentencing Guidelines range, and to consider that range, possible departures under the Sentencing Guidelines, and other sentencing factors under 18 U.S.C. § 3553(a), which include: (i) the nature and circumstances of the offense and the history and characteristics of the defendant; (ii) the need for the sentence imposed to reflect the seriousness of the offense, promote

respect for the law, provide just punishment for the offense, afford adequate deterrence to criminal conduct, protect the public from further crimes of the defendant, and provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner; (iii) the kinds of sentences available; (iv) the need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct; and (v) the need to provide restitution to any victim of the offense.

9. For purposes of calculating the Sentencing Guidelines, the parties agree on the following points:

a. **Applicable Guidelines.** The Sentencing Guidelines to be considered in this case are those in effect at the time of sentencing. The following statements regarding the calculation of the Sentencing Guidelines are based on the Guidelines Manual currently in effect, namely the 2023 Guidelines Manual.

b. **Offense Level Calculations.**

Count One

i. The base offense level is 20, pursuant to Guideline § 2B3.1(a).

ii. Pursuant to Application Note 4 to Guideline § 2K2.4, the 7-level enhancement specified at § 2B3.1(b)(2)(A) does not apply.

iii. The offense level is increased by 4 because a victim sustained serious bodily injury, pursuant to Guideline § 2B3.1(b)(3)(B).

iv. The offense level is increased by 2 because the offense involved carjacking.

v. Accordingly, the offense level for this count is 26.

Count Two

vi. Pursuant to Guideline § 2K2.4(b), the guideline sentence for this count is ten years.

Count Three

vii. The base offense level is 20, pursuant to Guideline § 2B3.1(a).

viii. Pursuant to Application Note 4 to Guideline § 2K2.4, the 6-level enhancement specified at § 2B3.1(b)(2)(B) does not apply.

ix.

x. The offense level is increased by 2 because the offense involved carjacking.

xi. Accordingly, the offense level for this count is 22.

Count Four

xii. Pursuant to Guideline § 2K2.4(b), the guideline sentence for this count is seven years.

Count Five

xiii. The base offense level is 20, pursuant to Guideline § 2B3.1(a).

xiv. The offense level is increased by 6, pursuant to Guideline § 2B3.1(b)(2)(B) because a firearm was otherwise used.

xv. The offense level is increased by 2 because the offense involved carjacking.

xvi. Accordingly, the offense level for this count is 28.

Grouping

xvii. Pursuant to Guideline § 3D1.2(d), Counts 1, 3, and 5 are not grouped together and each offense is a separate group. Pursuant to Guideline § 2K2.4(b), Counts 2 and 4 are excluded from grouping.

Combined Offense Level

xviii. Count Five has an offense level of 28. This group is assigned 1 Unit pursuant to Guideline § 3D1.4(a).

xix. Count One is 1 to 4 levels less serious than Count Five. Therefore, pursuant to Guideline § 3D1.4(a), Count One is assigned 1 Unit.

xx. Count Three is 5 to 8 levels less serious than Count Five. Therefore, pursuant to Guideline § 3D1.4(b), Count Three is assigned 1/2 Unit.

xxi. Pursuant to Guideline § 3D1.4, because there are 2 1/2 Units, the combined offense level is determined by adding three levels to the Group with the highest offense level, which is Count Five, offense level 28. Therefore, the combined offense level is 31.

xxii. Defendant has clearly demonstrated a recognition and affirmative acceptance of personal responsibility for his criminal conduct. If the government does not receive additional evidence in conflict with this provision, and if defendant continues to accept responsibility for his actions within the meaning of Guideline § 3E1.1(a), including by furnishing the United States Attorney's Office and the Probation Office with all requested financial information relevant to his ability to satisfy any fine or restitution that may be imposed in this case, a two-level reduction in the offense level is appropriate.

xxiii. In accord with Guideline § 3E1.1(b), defendant has timely notified the government of his intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and permitting the Court to allocate its resources efficiently. Therefore, as provided by Guideline § 3E1.1(b), if the Court determines the offense level to be 16 or greater prior to determining that defendant is entitled to a two-level reduction for acceptance of responsibility, the government will move for an additional one-level reduction in the offense level.

c. **Criminal History Category.** With regard to determining defendant's criminal history points and criminal history category, based on the facts now known to the government, defendant's criminal history points equal zero and defendant's criminal history category is I.

d. **Anticipated Advisory Sentencing Guidelines Range.** Therefore, based on the facts now known to the government, the anticipated offense

level is 28 which, when combined with the anticipated criminal history category of I, results in an anticipated advisory sentencing guidelines range of 78 to 97 months' imprisonment, in addition to any supervised release, fine, and restitution the Court may impose. Defendant also acknowledges that he is subject to a statutory minimum sentence of 10 years' imprisonment on Count Two, which must be imposed consecutively to all other counts, and a statutory minimum sentence of 7 years' imprisonment on Count Four, which must be imposed consecutively to all other counts.

e. Defendant and his attorney and the government acknowledge that the above guidelines calculations are preliminary in nature and are non-binding predictions upon which neither party is entitled to rely. Defendant understands that further review of the facts or applicable legal principles may lead the government to conclude that different or additional guidelines provisions apply in this case. Defendant understands that the Probation Office will conduct its own investigation and that the Court ultimately determines the facts and law relevant to sentencing, and that the Court's determinations govern the final guideline calculation. Accordingly, the validity of this Agreement is not contingent upon the probation officer's or the Court's concurrence with the above calculations, and defendant shall not have a right to withdraw his plea on the basis of the Court's rejection of these calculations.

10. Both parties expressly acknowledge that this Agreement is not governed by Fed. R. Crim. P. 11(c)(1)(B), and that errors in applying or interpreting any of the sentencing guidelines may be corrected by either party prior to sentencing. The parties may correct these errors either by stipulation or by a statement to the Probation Office or the Court, setting forth the disagreement regarding the applicable provisions of the guidelines. The validity of this Agreement will not be affected by such corrections, and defendant shall not have a right to withdraw his plea, nor the government the right to vacate this Agreement, on the basis of such corrections.

Agreements Relating to Sentencing

11. Each party is free to recommend whatever sentence it deems appropriate.

12. It is understood by the parties that the sentencing judge is neither a party to nor bound by this Agreement and may impose a sentence up to the maximum penalties as set forth above. Defendant further acknowledges that if the Court does not accept the sentencing recommendation of the parties, defendant will have no right to withdraw his guilty plea.

13. Regarding restitution, defendant acknowledges that pursuant to Title 18, United States Code, Section 3663A, the Court must order defendant to make full restitution to the victims of the offenses in an amount to be determined by the Court at sentencing, which amount shall reflect credit for any funds repaid prior to sentencing.

14. Restitution shall be due immediately and paid pursuant to a schedule to be set by the Court at sentencing. Defendant acknowledges that pursuant to Title 18, United States Code, Section 3664(k), he is required to notify the Court and the United States Attorney's Office of any material change in economic circumstances that might affect his ability to pay restitution.

15. Defendant agrees to pay the special assessment of \$500 at the time of sentencing with a cashier's check or money order payable to the Clerk of the U.S. District Court.

16. Defendant agrees that the United States may enforce collection of any fine or restitution imposed in this case pursuant to Title 18, United States Code, Sections 3572, 3613, and 3664(m), and Title 31, United States Code, Sections 3711, 3716, and 3728, notwithstanding any payment schedule set by the Court. In the event of the death or dissolution of, or the government's inability to locate the named recipient(s) of restitution in the Judgment and Commitment Order, the defendant agrees to not oppose efforts by the government to obtain an order substituting as payee a representative of the victim's estate, another family member, or any other person or successor entity appointed as suitable by the court, or the Crime Victims Fund.

17. After sentence has been imposed on the counts to which defendant pleads guilty as agreed herein, the government will move to dismiss the remaining count of the indictment as to defendant.

Acknowledgments and Waivers Regarding Plea of Guilty

Nature of Agreement

18. This Agreement is entirely voluntary and represents the entire agreement between the United States Attorney and defendant regarding defendant's criminal liability in case 24 CR 186.

19. This Agreement concerns criminal liability only. Except as expressly set forth in this Agreement, nothing herein shall constitute a limitation, waiver, or release by the United States or any of its agencies of any administrative or judicial civil claim, demand, or cause of action it may have against defendant or any other person or entity. The obligations of this Agreement are limited to the United States Attorney's Office for the Northern District of Illinois and cannot bind any other federal, state, or local prosecuting, administrative, or regulatory authorities, except as expressly set forth in this Agreement.

Waiver of Rights

20. Defendant understands that, by pleading guilty, he surrenders certain rights, including the following:

a. **Trial rights.** Defendant has the right to persist in a plea of not guilty to the charges against him, and if he does, he would have the right to a public and speedy trial.

i. The trial could be either a jury trial or a trial by the judge sitting without a jury. However, in order that the trial be conducted by the judge

sitting without a jury, defendant, the government, and the judge all must agree that the trial be conducted by the judge without a jury.

ii. If the trial is a jury trial, the jury would be composed of twelve citizens from the district, selected at random. Defendant and his attorney would participate in choosing the jury by requesting that the Court remove prospective jurors for cause where actual bias or other disqualification is shown, or by removing prospective jurors without cause by exercising peremptory challenges.

iii. If the trial is a jury trial, the jury would be instructed that defendant is presumed innocent, that the government has the burden of proving defendant guilty beyond a reasonable doubt, and that the jury could not convict him unless, after hearing all the evidence, it was persuaded of his guilt beyond a reasonable doubt and that it was to consider each count of the indictment separately. The jury would have to agree unanimously as to each count before it could return a verdict of guilty or not guilty as to that count.

iv. If the trial is held by the judge without a jury, the judge would find the facts and determine, after hearing all the evidence, and considering each count separately, whether or not the judge was persuaded that the government had established defendant's guilt beyond a reasonable doubt.

v. At a trial, whether by a jury or a judge, the government would be required to present its witnesses and other evidence against defendant.

Defendant would be able to confront those government witnesses and his attorney would be able to cross-examine them.

vi. At a trial, defendant could present witnesses and other evidence in his own behalf. If the witnesses for defendant would not appear voluntarily, he could require their attendance through the subpoena power of the Court. A defendant is not required to present any evidence.

vii. At a trial, defendant would have a privilege against self-incrimination so that he could decline to testify, and no inference of guilt could be drawn from his refusal to testify. If defendant desired to do so, he could testify in his own behalf.

b. **Appellate rights.** Defendant further understands he is waiving all appellate issues that might have been available if he had exercised his right to trial, and may only appeal the validity of this plea of guilty and the sentence imposed. Defendant understands that any appeal must be filed within 14 calendar days of the entry of the judgment of conviction.

21. Defendant understands that, by pleading guilty, he is waiving all the rights set forth in the prior paragraphs, with the exception of the appellate rights specifically preserved above. Defendant's attorney has explained those rights to him, and the consequences of his waiver of those rights.

Presentence Investigation Report/Post-Sentence Supervision

22. Defendant understands that the United States Attorney's Office in its submission to the Probation Office as part of the Pre-Sentence Report and at sentencing shall fully apprise the District Court and the Probation Office of the nature, scope, and extent of defendant's conduct regarding the charges against him, and related matters. The government will make known all matters in aggravation and mitigation relevant to sentencing.

23. Defendant agrees to truthfully and completely execute a Financial Statement (with supporting documentation) prior to sentencing, to be provided to and shared among the Court, the Probation Office, and the United States Attorney's Office regarding all details of his financial circumstances, including his recent income tax returns as specified by the probation officer. Defendant understands that providing false or incomplete information, or refusing to provide this information, may be used as a basis for denial of a reduction for acceptance of responsibility pursuant to Guideline § 3E1.1 and enhancement of his sentence for obstruction of justice under Guideline § 3C1.1, and may be prosecuted as a violation of Title 18, United States Code, Section 1001 or as a contempt of the Court.

24. For the purpose of monitoring defendant's compliance with his obligations to pay a fine and restitution during any term of supervised release or probation to which defendant is sentenced, defendant further consents to the disclosure by the IRS to the Probation Office and the United States Attorney's Office

of defendant's individual income tax returns (together with extensions, correspondence, and other tax information) filed subsequent to defendant's sentencing, to and including the final year of any period of supervised release or probation to which defendant is sentenced. Defendant also agrees that a certified copy of this Agreement shall be sufficient evidence of defendant's request to the IRS to disclose the returns and return information, as provided for in Title 26, United States Code, Section 6103(b).

Other Terms

25. Defendant agrees to cooperate with the United States Attorney's Office in collecting any ordered fine and restitution for which defendant is liable, including providing financial statements and supporting records as requested by the United States Attorney's Office.

26. Defendant understands that, if convicted, a defendant who is not a United States citizen may be removed from the United States, denied citizenship, and denied admission to the United States in the future.

Conclusion

27. Defendant understands that this Agreement will be filed with the Court, will become a matter of public record, and may be disclosed to any person.

28. Defendant understands that his compliance with each part of this Agreement extends throughout the period of his sentence, and failure to abide by any term of the Agreement is a violation of the Agreement. Defendant further

understands that in the event he violates this Agreement, the government, at its option, may move to vacate the Agreement, rendering it null and void, and thereafter prosecute defendant not subject to any of the limits set forth in this Agreement, or may move to resentence defendant or require defendant's specific performance of this Agreement. Defendant understands and agrees that in the event that the Court permits defendant to withdraw from this Agreement, or defendant breaches any of its terms and the government elects to void the Agreement and prosecute defendant, any prosecutions that are not time-barred by the applicable statute of limitations on the date of the signing of this Agreement may be commenced against defendant in accordance with this paragraph, notwithstanding the expiration of the statute of limitations between the signing of this Agreement and the commencement of such prosecutions.

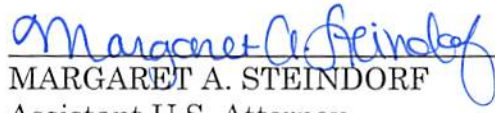
29. Should the judge refuse to accept defendant's plea of guilty, this Agreement shall become null and void and neither party will be bound to it.

30. Defendant and his attorney acknowledge that no threats, promises, or representations have been made, nor agreements reached, other than those set forth in this Agreement, to cause defendant to plead guilty.

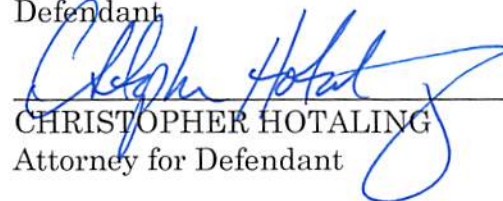
31. Defendant acknowledges that he has read this Agreement and carefully reviewed each provision with his attorney. Defendant further acknowledges that he understands and voluntarily accepts each and every term and condition of this Agreement.

AGREED THIS DATE: 4/17/2025


ANDREW S. BOUTROS
United States Attorney


MARGARET A. STEINDORF
Assistant U.S. Attorney


JAMARI EDWARDS
Defendant


CHRISTOPHER HOTALING
Attorney for Defendant