

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 22 CR 395
v.)	
)	
EDSON RESENDEZ, aka "Savage,")	Violation: Title 18, United States
MAVERICK CELA, aka "G Reckless," and)	Code, Sections 371, 2119,
PREZILA APREZA)	924(c)(1)(A), 1959, 1962 and 2
)	
)	<u>Second Superseding Indictment</u>

COUNT ONE

The SPECIAL APRIL 2024 GRAND JURY charges:

THE ENTERPRISE

At all times material to this indictment:

1. The defendants, and others known and unknown to the Grand Jury, were members and associates of the "Drake and Ainslie Section" of the "Spanish Gangster Disciples" street gang, a criminal organization whose members and associates engaged in acts of violence, including but not limited to acts involving murder, robbery (including vehicular hijacking), and arson, and which operated on the Northwest Side of Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere.

2. The "Drake and Ainslie Section" of the "Spanish Gangster Disciples" street gang, including its leaders, members, and associates, constituted an "enterprise," as defined in Title 18, United States Code, Section 1961(4) (hereinafter,

“the SGD Enterprise”), that is, a group of individuals associated in fact, which enterprise engaged in, and the activities of which affected, interstate and foreign commerce.

3. The SGD Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

4. Defendants EDSON RESENDEZ, aka “Savage,” MAVERICK CELA, aka “G Reckless,” and PREZILA APREZA, and others known and unknown to the Grand Jury, were leaders, members, and associates of the SGD Enterprise who carried out and directed other members of the SGD Enterprise in carrying out unlawful and other activities in furtherance of the conduct of the SGD Enterprise’s affairs.

5. The SGD Enterprise had been engaged in a feud with several rival street gangs, including, “Latin Brothers,” “La Familia Stones,” “Latin Kings,” “Four Corner Hustlers,” and “Conservative Vice Lords,” among others. Over the course of these conflicts, SGD Enterprise members and associates committed acts of violence against their rivals, inside rival areas, and in areas rivals were perceived to be.

6. Certain members and associates enjoyed significant power and respect within the SGD Enterprise. Defendant MAVERICK CELA, aka “G Reckless” was among the SGD Enterprise’s leaders.

PURPOSES OF THE ENTERPRISE

7. The purposes of the SGD Enterprise included, but were not limited to, the following:

- a. Acquiring, preserving, and protecting power, territory, operations and proceeds for the enterprise through the use of threats, intimidation, and violence, including but not limited to, acts involving murder, robbery (including vehicular hijacking), and other acts of violence and threats of violence;
- b. Promoting and enhancing the enterprise and its members' and associates' activities;
- c. Increasing the status of the enterprise through the use of social media platforms;
- d. Keeping rival gang members in fear of the enterprise and its leaders, members, and associates through acts of violence; and
- e. Taking steps designed to prevent law enforcement's detection of the enterprise's criminal activities.

ROLES IN THE ENTERPRISE

8. At all times material to this indictment:
- a. MAVERICK CELA, aka "G Reckless," was a leader and member of the SGD Enterprise, holding the role of "Chief of Shorties." CELA oversaw, directed, guided, and participated in the illegal activities of the enterprise, including,

but not limited to, acts involving murder, robbery (vehicular hijacking), arson, and other acts of violence.

b. EDSON RESENDEZ, aka “Savage,” was a member of the SGD Enterprise. RESENDEZ served the enterprise by, among other things, directing and participating in the illegal activities of the enterprise, including, but not limited to, acts involving murder, robbery (including vehicular hijacking), and other acts of violence.

c. PREZILA APREZA was an associate of the SGD Enterprise. APREZA served the enterprise by, among other things, participating in the illegal activities of the enterprise, including, but not limited to, acts involving murder, robbery (including vehicular hijacking), and other acts of violence.

MEANS AND METHODS OF THE ENTERPRISE

9. Among the means and methods by which the defendants and other members and associates of the SGD Enterprise conducted and participated in the conduct of the affairs of the enterprise included, but were not limited to, the following:

a. Members of the enterprise initiated members through the practice of causing them to endure physical assaults conducted by members of the enterprise at various gang-related gatherings;

b. Members and associates of the enterprise employed and used gang-related terminology, symbols, and gestures;

c. Members of the enterprise adopted a leadership structure where certain members were given titles and responsibilities to oversee the actions of other members and associates of the enterprise;

d. Members and associates of the enterprise promoted the enterprise on social media sites, including Facebook and Snapchat. For example, SGD members and associates distributed messages, photographs, and videos on the social media sites during which they, among other things, proclaimed their membership in, or association with, the enterprise and boasted about illegal activities, including multiple acts involving murder and robbery (including vehicular hijackings);

e. Members and associates of the enterprise attended meetings, referred to as “juntas,” at which they discussed and planned criminal activity;

f. Members of the enterprise paid dues to the organization. Those dues were used to advance the purposes of the organization by paying attorney fees for enterprise members, funding commissary accounts of incarcerated members, funding bond payments for members, paying for member funerals, and purchasing firearms;

g. Members of the enterprise enforced discipline and rules of the enterprise, by enforcing a system of “violations,” in which members of the enterprise physically assaulted those individuals who violated the rules, including but not limited to acting in a manner to leave the enterprise’s territory unprotected;

h. To perpetuate the enterprise and to maintain and extend its power, members and associates of the enterprise committed illegal acts, including, but not limited to, multiple acts involving murder against individuals who posed a threat to the enterprise or jeopardized its operations, including rival gang members;

i. To perpetuate the enterprise and to maintain and extend its power, members and associates of the enterprise hijacked and stole cars, which they used to drive through the neighborhoods of rival gang members, shoot at rival gang members, and sell drugs;

j. Members and associates of the enterprise utilized Facebook and Snapchat to communicate with one another concerning and during the commission of the enterprise's illegal activities;

k. Members and associates of the enterprise obtained, used, carried, possessed, brandished, and discharged firearms in connection with the enterprise's illegal activities, including, but not limited to, acts involving murder and robbery (including vehicular hijacking);

l. Members and associates of the enterprise managed the procurement, transfer, use, maintenance, concealment, and disposal of firearms and dangerous weapons within the enterprise to protect their territory, personnel and operations, and to deter, eliminate, and retaliate against competitors and rival criminal organizations and persons;

m. Members and associates of the enterprise concealed and hid, and caused to be concealed and hidden, acts done in furtherance of the enterprise, and used coded language and other techniques and other means to avoid detection and apprehension by law enforcement and otherwise to provide security to members and associates of the enterprise;

n. Members and associates of the enterprise disposed of evidence of acts done in furtherance of the enterprise, including by using arson to dispose of vehicles used to commit violent acts in furtherance of the enterprise;

o. Members and associates of the enterprise monitored law enforcement radio frequencies in order to detect and avoid law enforcement inquiry into their illegal activities; and

p. Members and associates of the enterprise possessed, distributed, and possessed with intent to distribute controlled substances in the conduct of the affairs of the enterprise.

RACKETEERING CONSPIRACY

10. Beginning no later than in or around October 2019 and continuing through in or around October 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

EDSON RESENDEZ, aka “Savage,”
MAVERICK CELA, aka “G Reckless,” and
PREZILA APREZA,

defendants herein, and others known and unknown to the Grand Jury, each being a

person employed by and associated with the SGD Enterprise, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly conspired to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the SGD enterprise through a pattern of racketeering activity, which pattern of racketeering activity consisted of:

a. multiple acts involving murder, chargeable under Chapter 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-1, 5/8-2, 5/8-4, and 5/9-1;

b. multiple acts involving robbery, chargeable under Chapter 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-1, 5/8-2, 5/8-4, 5/18-1 and 5/18-3; and

c. multiple acts involving arson, chargeable under Chapter 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-1, 5/8-2, 5/8-4 and 5/20-1.

11. It was further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

Overt Acts

12. In furtherance of the racketeering conspiracy, and to effect the object thereof, the defendants and others known and unknown to the Grand Jury, committed or caused to be committed the following acts, among others, in the Northern District of Illinois and elsewhere:

- a. On or about September 11, 2020, EDSON RESENDEZ, MAVERICK CELA, and members and associates of SGD robbed Victim A of personal property, including Victim A's 2014 Chevrolet Sonic.
- b. On or about September 13, 2020, EDSON RESENDEZ, MAVERICK CELA, and other members and associates of SGD robbed Victim B of personal property, including Victim B's 2014 Lexus GS350.
- c. On or about September 14, 2020, MAVERICK CELA, and other members and associates of SGD committed arson by setting fire to Victim A's 2014 Chevrolet Sonic.
- d. On or about September 16, 2020, EDSON RESENDEZ, MAVERICK CELA, PREZILA APREZA, and other members and associates of SGD robbed Victim E of personal property, including Victim E's 2016 Mercedes C300.
- e. On or about September 16, 2020, MAVERICK CELA and PREZILA APREZA murdered Victim Adam Lique.
- f. On or about September 21, 2020, EDSON RESENDEZ, MAVERICK CELA, and PREZILA APREZA, and other members of SGD attempted to murder Victim F.
- g. On or about September 21, 2020, EDSON RESENDEZ, MAVERICK CELA, PREZILA APREZA, and other members of SGD attempted to rob Victim Nabil Marhouar of personal property, including Victim Nabil Marhouar's 2014 Volkswagen CC.

h. On or about September 21, 2020, EDSON RESENDEZ, MAVERICK CELA, PREZILA APREZA, and other members of SGD murdered Victim Nabil Marhouar.

i. On or about September 21, 2020, EDSON RESENDEZ, MAVERICK CELA, PREZILA APREZA, and other members of SGD murdered Victim Eduardo Triano.

j. On or about September 21, 2020, EDSON RESENDEZ, MAVERICK CELA, PREZILA APREZA, and other members of SGD attempted to murder Victim G.

k. On or about September 21, 2020, EDSON RESENDEZ, MAVERICK CELA, and PREZILA APREZA robbed Victim H of personal property, including by taking Victim H's 2020 Chevrolet Equinox.

Special Sentencing Factors as to Count One

As part of their agreement to conduct and participate in the conduct of the affairs of the SGD Enterprise through a pattern of racketeering activity, the following defendants committed the following acts:

1. On or about September 16, 2020, within the Northern District of Illinois, the defendants MAVERICK CELA and PREZILA APREZA killed Adam Lique without lawful justification, and in performing acts which caused the death of Adam Lique: (a) intended to kill and do great bodily harm to Adam Lique and knew that such acts would cause the death of Adam Lique or another; and (b) knew that such acts created a strong probability of death and great bodily harm to Adam Lique or another; in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(a)(1) and (a)(2), 5/5-1, and 5/5-2.

a. MAVERICK CELA and PREZILA APREZA were each over 18 years of age at the time of the murder of Adam Lique, pursuant to Chapter 720, Illinois Compiled Statutes, 5/9-1(b);

b. As to defendant MAVERICK CELA, the murder was accompanied by exceptionally brutal and heinous behavior indicative of wanton cruelty, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(b);

c. As to defendant MAVERICK CELA, the murder was committed in a cold, calculated and premeditated manner pursuant to a preconceived plan, scheme, and design to take a human life by unlawful means, and the conduct of the

named defendant created a reasonable expectation that the death of a human being would result therefrom; in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(b) and Chapter 720, Illinois Compiled Statutes, 5/9-1(b)(11);

d. As to defendant MAVERICK CELA, the murder was committed as a result of the intentional discharge of a firearm by the named defendant from a motor vehicle and the victim was not present within the motor vehicle; in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(b) and Chapter 720, Illinois Compiled Statutes, 5/9-1(b)(15);

e. MAVERICK CELA personally discharged a firearm that proximately caused great bodily harm and death to another person; in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(d)(iii); and

f. MAVERICK CELA and PREZILA APREZA each murdered more than one victim, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(c)(ii).

2. On or about September 21, 2020, within the Northern District of Illinois, the defendants MAVERICK CELA, EDSON RESENDEZ, and PREZILA APREZA killed Nabil Marhouar without lawful justification, and in performing acts which caused the death of Nabil Marhouar: (a) intended to kill and do great bodily harm to Nabil Marhouar and knew that such acts would cause the death of Nabil Marhouar or another; and (b) knew that such acts created a strong probability of death and great bodily harm to Nabil Marhouar or another; and (c) committed and attempted

to commit a forcible felony other than second degree murder, in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(a), 5/5-1, and 5/5-2.

a. MAVERICK CELA, EDSON RESENDEZ, and PREZILA APREZA were each over 18 years of age at the time of the murder of Nabil Marhouar, pursuant to Chapter 720, Illinois Compiled Statutes, 5/9-1(b);

b. As to defendants MAVERICK CELA and EDSON RESENDEZ, the murder was accompanied by exceptionally brutal and heinous behavior indicative of wanton cruelty, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(b);

c. As to defendant EDSON RESENDEZ, (a) the victim, Nabil Marhouar, was (i) actually killed by EDSON RESENDEZ, and (ii) received physical injuries personally inflicted by EDSON RESENDEZ substantially contemporaneously with physical injuries caused by a person for whose conduct EDSON RESENDEZ was legally accountable, and the physical injuries inflicted by the defendant and the other person for whose conduct he is legally accountable caused the death of Nabil Marhouar; and (b) in performing the acts which caused the death of Nabil Marhouar and which resulted in physical injuries personally inflicted by EDSON RESENDEZ on Nabil Marhouar under the circumstances of the robbery of Nabil Marhouar, EDSON RESENDEZ acted with the intent to kill Nabil Marhouar and with the knowledge that his acts created a strong probability of death and great bodily harm to Nabil Marhouar or another; and (c) the robbery of Nabil Marhouar

was an inherently violent crime and the attempt to commit an inherently violent crime, including robbery; in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(b)(6) and Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(b);

d. As to defendants MAVERICK CELA, EDSON RESENDEZ, and PREZILA APREZA, the murder was committed in a cold, calculated, and premeditated manner pursuant to a preconceived plan, scheme, and design to take a human life by unlawful means; and the conduct of the named defendant created a reasonable expectation that the death of a human being would result therefrom; in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(b) and Chapter 720, Illinois Compiled Statutes, 5/9-1(b)(11); and

e. MAVERICK CELA, EDSON RESENDEZ, and PREZILA APREZA each murdered more than one victim, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(c)(ii).

3. On or about September 21, 2020, within the Northern District of Illinois, the defendants MAVERICK CELA, EDSON RESENDEZ, and PREZILA APREZA killed Eduardo Triano without lawful justification, and in performing acts which caused the death of Eduardo Triano: (a) intended to kill and do great bodily harm to Eduardo Triano and knew that such acts would cause the death of Eduardo Triano or another; and (b) knew that such acts created a strong probability of death and

great bodily harm to Eduardo Triano or another; in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(a), 5/5-1, and 5/5-2.

a. MAVERICK CELA, EDSON RESENDEZ, and PREZILA APREZA were each over 18 years of age at the time of the murder of Eduardo Triano pursuant to Chapter 720, Illinois Compiled Statutes, 5/9-1(b);

b. As to defendants MAVERICK CELA and EDSON RESENDEZ, the murder was accompanied by exceptionally brutal and heinous behavior indicative of wanton cruelty, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(b);

c. As to defendants MAVERICK CELA, EDSON RESENDEZ, and PREZILA APREZA, the murder was committed in a cold, calculated, and premeditated manner pursuant to a preconceived plan, scheme, and design to take a human life by unlawful means, and the conduct of the named defendants created a reasonable expectation that the death of a human being would result therefrom; in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(b) and Chapter 720, Illinois Compiled Statutes, 5/9-1(b)(11);

d. MAVERICK CELA personally discharged a firearm that proximately caused great bodily harm and death to another person; in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(d)(iii); and

e. EDSON RESENDEZ, MAVERICK CELA, and PREZILA APREZA each murdered more than one victim, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(c)(ii).

All in violation of Title 18, United States Code, Section 1962(d).

COUNT TWO

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. Beginning no later than on or about September 11, 2020, and continuing until on or about September 21, 2020, in Cook County, in the Northern District of Illinois, Eastern Division, and elsewhere,

EDSON RESENDEZ, aka "Savage,"
MAVERICK CELA, aka "G Reckless," and
PREZILA APREZA,

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, to take a motor vehicle from the presence of another person by force and violence and by intimidation, with intent to cause death and serious bodily harm, which vehicle had been transported, shipped, and received in interstate commerce, in violation of Title 18, United States Code, Section 2119;

2. It was part of the conspiracy that defendants sought to obtain motor vehicles for the purpose of committing other crimes, including murders, attempted murders, additional vehicular hijackings, and obtaining property from the vehicular hijacking victims, including credit and debit cards.

3. It was further part of the conspiracy that defendants EDSON RESENDEZ, MAVERICK CELA, and PREZILA APREZA, and others known and unknown to the Grand Jury, used a firearm in order to take motor vehicles from the presence of another person by force and violence and by intimidation.

4. It was further part of the conspiracy that defendants obtained, possessed, brandished, and discharged a firearm in connection with the taking of a motor vehicle.

5. It was further part of the conspiracy that defendants EDSON RESENDEZ, MAVERICK CELA, and PREZILA APREZA, 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.

OVERT ACTS

6. In furtherance of the conspiracy and to accomplish the objectives of the conspiracy, defendants committed one or more overt acts in the Northern District of Illinois, and elsewhere, which overt acts included but were not limited to the following:

- (a) On or before September 11, 2020, defendant EDSON RESENDEZ obtained a firearm;
- (b) On or about September 11, 2020, in Morton Grove, Illinois, defendants EDSON RESENDEZ, MAVERICK CELA, and others known and unknown to the Grand Jury, took Victim A's 2014 Chevrolet Sonic from the person and presence of Victim A by force, violence, and intimidation;
- (c) On or about September 11, 2020, in Skokie, Illinois, defendants EDSON RESENDEZ and MAVERICK CELA drove the stolen 2014 Chevrolet Sonic

to a Burger King and used Victim A's credit card to purchase food from Burger King;

- (d) On or about September 12, 2020, defendants EDSON RESENDEZ and MAVERICK CELA, and others known and unknown to the Grand Jury, obtained a license plate from a stolen 2013 Chevy and affixed it to the stolen 2014 Chevy Sonic;
- (e) On or about September 13, 2020, defendants EDSON RESENDEZ and MAVERICK CELA, and others known and unknown to the Grand Jury, drove the stolen 2014 Chevy Sonic to Skokie, Illinois to obtain another vehicle;
- (f) On or about September 13, 2020, in Skokie, Illinois, defendant MAVERICK CELA drove the stolen 2014 Chevy Sonic in front of the driveway containing Victim B's 2014 Lexus GS350;
- (g) On or about September 13, 2020, in Skokie, Illinois, defendant EDSON RESENDEZ brandished a firearm at Victim B;
- (h) On or about September 13, 2020, in Skokie, Illinois, defendants EDSON RESENDEZ and MAVERICK CELA, and others known and unknown to the Grand Jury, took Victim B's 2014 Lexus GS350, from the person and presence of Victim B by force, violence, and intimidation;
- (i) On or about September 14, 2020, defendant MAVERICK CELA, and others known and unknown to the Grand Jury, disposed of the stolen 2014 Chevy

Sonic by lighting it on fire on the 6200 block of North Lincoln Avenue, in Chicago, Illinois;

- (j) On or about September 16, 2020, in Chicago, Illinois, defendants EDSON RESENDEZ and MAVERICK CELA, and others known and unknown to the Grand Jury, abandoned the stolen 2014 Lexus GS350 on the 4800 block of North Hermitage Avenue, in Chicago, Illinois;
- (k) On or before September 16, 2020, defendant MAVERICK CELA obtained a firearm;
- (l) On or about September 16, 2020, in Skokie, Illinois, defendant PREZILA APREZA drove her Chevy Trailblazer towards Victim C's 2015 Hyundai Elantra;
- (m) On or about September 16, 2020, in Skokie, Illinois, defendants EDSON RESENDEZ, MAVERICK CELA, and PREZILA APREZA stole Victim C's 2015 Hyundai Elantra;
- (n) On or about September 16, 2020, defendants EDSON RESENDEZ and MAVERICK CELA drove the stolen 2015 Hyundai Elantra to Morton Grove to obtain another vehicle;
- (o) On or about September 16, 2020, defendants EDSON RESENDEZ and MAVERICK CELA, while driving the stolen 2015 Hyundai Elantra, parked next to Victim D's 2012 Chevy Traverse, intending to obtain that car;

- (p) On or about September 16, 2020, defendants EDSON RESENDEZ, MAVERICK CELA, PREZILA APREZA, and Individual A drove the stolen 2015 Hyundai Elantra to Skokie to obtain another vehicle;
- (q) On or about September 16, 2020, in Skokie, Illinois, a defendant brandished a firearm at Victim E;
- (r) On or about September 16, 2020, in Skokie, Illinois, defendants MAVERICK CELA, EDSON RESENDEZ, PREZILA APREZA, and others known and unknown to the Grand Jury took Victim E's 2016 Mercedes C300, from the person and presence of Victim E by force, violence and intimidation;
- (s) On or about September 16, 2020, in Chicago, Illinois, defendants MAVERICK CELA and EDSON RESENDEZ drove the stolen 2016 Mercedes C300 to a Shell gas station at 5155 North Kimball;
- (t) On or about September 16, 2020, in Chicago, Illinois, defendants EDSON RESENDEZ and PREZILA APREZA used Victim E's credit card at a Shell gas station at 5155 North Kimball, to put fuel in APREZA's Chevy Trailblazer;
- (u) On or about September 16, 2020, in Chicago, Illinois, defendants EDSON RESENDEZ and PREZILA APREZA drove the stolen 2016 Mercedes C300 to a Burger King and used Victim E's credit card to purchase food from the Burger King;

- (v) On or about September 16, 2020, in Chicago, Illinois, defendants MAVERICK CELA and PREZILA APREZA, drove the stolen 2016 Mercedes C300 to a McDonald's and used Victim E's credit card to purchase food from the McDonald's;
- (w) On or about September 16, 2020, in Chicago, Illinois, defendant PREZILA APREZA used Victim E's credit card at a Snappy's convenience store;
- (x) On or before September 21, 2020, defendants MAVERICK CELA, EDSON RESENDEZ, PREZILA APREZA, and Individual A obtained three firearms;
- (y) On or about September 21, 2020, defendants MAVERICK CELA, EDSON RESENDEZ, PREZILA APREZA, and Individual A drove the stolen 2015 Hyundai Elantra to Skokie, to obtain another vehicle;
- (z) On or about September 21, 2020, in Skokie, Illinois, defendants MAVERICK CELA, EDSON RESENDEZ, PREZILA APREZA, and Individual A drove the stolen 2015 Hyundai Elantra up to Victim F's 2005 Nissan Altima;
- (aa) On or about September 21, 2020, in Skokie, Illinois, defendants discharged three firearms at Victim F;
- (bb) On or about September 21, 2020, defendants MAVERICK CELA, EDSON RESENDEZ, PREZILA APREZA, and Individual A drove the stolen 2015 Hyundai Elantra to Chicago, to obtain another vehicle;

- (cc) On or about September 21, 2020, in Chicago, Illinois, defendants MAVERICK CELA, EDSON RESENDEZ, PREZILA APREZA, and Individual A attempted to steal Victim Nabil Marhouar's 2014 Volkswagen CC from the person and presence of Nabil Marhouar by force, violence and intimidation;
- (dd) On or about September 21, 2020, in Chicago, Illinois, defendants discharged two firearms at Nabil Marhouar, resulting in the death of Nabil Marhouar;
- (ee) On or about September 21, 2020, in Chicago, Illinois, defendants MAVERICK CELA, EDSON RESENDEZ, PREZILA APREZA and Individual A drove the stolen Hyundai Elantra next to a 2018 Toyota Corolla containing Victim G and Eduardo Triano;
- (ff) On or about September 21, 2020, in Chicago, Illinois, a defendant discharged a firearm at Victim G and Eduardo Triano, resulting in the death of Eduardo Triano;
- (gg) On or about September 21, 2020, defendants MAVERICK CELA, EDSON RESENDEZ, and PREZILA APREZA drove the stolen 2015 Hyundai Elantra to Berwyn, to obtain another vehicle;
- (hh) On or about September 21, 2020, in Berwyn, Illinois, a defendant brandished a firearm at Victim H;

- (ii) On or about September 21, 2020, in Berwyn, Illinois, defendants MAVERICK CELA, EDSON RESENDEZ, and PREZILA APREZA took Victim H's 2020 Chevrolet Equinox, from the person and presence of Victim H by force, violence, and intimidation;
- (jj) On or about September 21, 2020, in Chicago, Illinois, defendants EDSON RESENDEZ, MAVERICK CELA, and PREZILA APREZA, abandoned the stolen 2015 Hyundai Elantra on the 3800 block of North Parkview Terrace, in Chicago, Illinois; and
- (kk) On or about September 21, 2020, in Chicago, Illinois, defendants EDSON RESENDEZ, MAVERICK CELA, and PREZILA APREZA, abandoned the stolen 2020 Chevrolet Equinox at approximately the intersection of West Altgeld Street and North Keeler Avenue, in Chicago, Illinois;

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

COUNT THREE

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about September 11, 2020, at Morton Grove, in the Northern District of Illinois, Eastern Division,

EDSON RESENDEZ, aka “Savage,” and
MAVERICK CELA, aka “G Reckless,”

defendants herein, with intent to cause death and serious bodily harm, took a motor vehicle, namely a 2014 Chevrolet Sonic, 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, Sections 2119 and 2.

COUNT FOUR

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about September 11, 2020, at Morton Grove, in the Northern District of Illinois, Eastern Division,

EDSON RESENDEZ, aka “Savage,” and
MAVERICK CELA, aka “G Reckless,”

defendants herein, did use, carry and brandish a firearm, during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, namely, carjacking, in violation of Title 18, United States Code, Section 2119 and 2, as charged in Count Three of this indictment;

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

COUNT FIVE

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about September 13, 2020, at Skokie, in the Northern District of Illinois,
Eastern Division,

EDSON RESENDEZ, aka “Savage,” and
MAVERICK CELA, aka “G Reckless,”C

defendants herein, with intent to cause death and serious bodily harm, took a motor vehicle, namely a 2014 Lexus GS350, 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, Sections 2119 and 2.

COUNT SIX

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about September 13, 2020, at Skokie, in the Northern District of Illinois,
Eastern Division,

EDSON RESENDEZ, aka “Savage,” and
MAVERICK CELA, aka “G Reckless,”

defendants herein, did use, carry and brandish a firearm, during and in relation to a
crime of violence for which each may be prosecuted in a court of the United States,
namely, carjacking, in violation of Title 18, United States Code, Section 2119 and 2,
as charged in Count Five of this indictment;

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

COUNT SEVEN

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about September 16, 2020, at Skokie, in the Northern District of Illinois,
Eastern Division,

EDSON RESENDEZ, aka “Savage,”
MAVERICK CELA, aka “G Reckless,” and
PREZILA APREZA,

defendants herein, with intent to cause death and serious bodily harm, took a motor vehicle, namely a 2016 Mercedes C300, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of Victim E, by force, violence and intimidation;

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT EIGHT

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about September 16, 2020, at Skokie, in the Northern District of Illinois,
Eastern Division,

EDSON RESENDEZ, aka “Savage,”
MAVERICK CELA, aka “G Reckless,” and
PREZILA APREZA,

defendants herein, did use, carry, and brandish a firearm, during and in relation to
a crime of violence for which each may be prosecuted in a court of the United States,
namely, carjacking, in violation of Title 18, United States Code, Section 2119 and 2,
as charged in Count Seven of this indictment;

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

COUNT NINE

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. Paragraphs One through Nine of Count One are incorporated here.
2. At all times relevant to this indictment, the SGD Enterprise, including its leaders, members, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), namely, a group of individuals associated in fact, which was engaged in, and the activities of which affected interstate and foreign commerce. The SGD Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.
3. At times relevant to this indictment, the SGD Enterprise, through its leaders, members, and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder and robbery, in violation of Illinois law.
4. On or about September 16, 2020, at Chicago, in the Northern District of Illinois, Eastern Division,

MAVERICK CELA, aka “G Reckless,” and
PREZILA APREZA,

defendants herein, for the purpose of gaining entrance to and maintaining and increasing position in the SGD Enterprise, an enterprise engaged in racketeering activity, did knowingly murder an individual, namely, Adam Lique, in violation of the laws of the State of Illinois, to wit, Chapter 720, Illinois Compiled Statutes,

Sections 5/9-1(a)(1) and (a)(2), 5/5-1, and 5/5-2);

In violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT TEN

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about September 21, 2020, at Chicago, in the Northern District of Illinois, Eastern Division,

EDSON RESENDEZ, aka “Savage,”
MAVERICK CELA, aka “G Reckless,” and
PREZILA APREZA,

defendants herein, with intent to cause death and serious bodily harm, attempted to take a motor vehicle, namely, a 2014 Volkswagen CC, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of Nabil Marhouar, by force, violence and intimidation, resulting in the death of Nabil Marhouar;

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT ELEVEN

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. Paragraphs One through Three of Count Nine are incorporated here.
2. On or about September 21, 2020, at Chicago, in the Northern District of Illinois, Eastern Division,

EDSON RESENDEZ, aka “Savage,”
MAVERICK CELA, aka “G Reckless,” and
PREZILA APREZA,

defendants herein, for the purpose of gaining entrance to and maintaining and increasing position in the SGD Enterprise, an enterprise engaged in racketeering activity, did knowingly murder an individual, namely, Eduardo Triano, in violation of the laws of the State of Illinois, to wit, Chapter 720, Illinois Compiled Statutes, Sections 5/9-1(a), 5/5-1, and 5/5-2);

In violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT TWELVE

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. Paragraphs One through Three of Count Nine are incorporated here.
2. On or about September 21, 2020, at Chicago, in the Northern District of

Illinois, Eastern Division,

EDSON RESENDEZ, aka “Savage,”
MAVERICK CELA, aka “G Reckless,” and
PREZILA APREZA,

defendants herein, for the purpose of gaining entrance to and maintaining and increasing position in the SGD Enterprise, an enterprise engaged in racketeering activity, did knowingly attempt to murder an individual, namely, Victim G, in violation of the laws of the State of Illinois, to wit, Chapter 720, Illinois Compiled Statutes, Sections 5/9-1(a), 5/8-4, 5/5-1, and 5/5-2.

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT THIRTEEN

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about September 21, 2020, at Berwyn, in the Northern District of Illinois,
Eastern Division,

EDSON RESENDEZ, aka “Savage,”
MAVERICK CELA, aka “G Reckless,” and
PREZILA APREZA,

defendants herein, with intent to cause death and serious bodily harm, took a motor vehicle, namely a 2020 Chevrolet Equinox, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of Victim H, by force, violence and intimidation;

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT FOURTEEN

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about September 21, 2020, at Berwyn, in the Northern District of Illinois,
Eastern Division,

EDSON RESENDEZ, aka “Savage,”
MAVERICK CELA, aka “G Reckless,” and
PREZILA APREZA,

defendants herein, did knowingly use, carry, and brandish a firearm, during and in
relation to a crime of violence for which each may be prosecuted in a court of the
United States, namely, carjacking, in violation of Title 18, United States Code,
Sections 2119 and 2, as charged in Count Thirteen of this indictment;

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

FORFEITURE ALLEGATION

The SPECIAL APRIL 2024 GRAND JURY further charges:

1. The allegations of Count One of this indictment are incorporated here for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to title 18, United States Code, Section 1963.

2. As a result of their violation of Title 18, United States Code, Section 1962(d), as alleged in the foregoing indictment,

EDSON RESENDEZ, aka "Savage,"
MAVERICK CELA, aka "G Reckless," and
PREZILA APREZA,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963(a)(1), (a)(2), and (a)(3), any interest acquired or maintained in violation of Section 1962; any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the person has established, operated, controlled, conducted, or participated in the conduct of, in violation of Section 1962; and any property consisting, or derived from, any proceeds which the person obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of Section 1962.

3. If any property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 1963(a)(1), (a)(2), and (a)(3), as a result of any act or omission of the defendants:

a. Cannot be located upon the exercise of due diligence;

- b. Has been transferred to, sold to, or deposited with a third person;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value;
- e. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property belonging to the defendants under the provisions of Title 18, United States Code, Section 1963(m).

A TRUE BILL:

FOREPERSON

Andrew S. Boutros by SME
UNITED STATES ATTORNEY