

FILED
6/24/2025
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

Case No. 25 CR 315

v.

MAURICE D. LEE, JR.

Violations: Title 18, United States Code,
Sections 2113(a), 2119(1), and 924(c)(1)(A)
1:25-cr-00315

COUNT ONE

Judge Martha M. Pacold
Magistrate Judge Gabriel A.
Fuentes
Cat 5 Random Assignment

The SPECIAL MAY 2024 GRAND JURY charges:

On or about May 10, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

MAURICE D. LEE, JR.,

defendant herein, with intent to cause death and serious bodily harm, took a motor vehicle, namely, a 2010 Toyota Highlander, 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(1).

COUNT TWO

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about May 10, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

MAURICE D. LEE, JR.,

defendant herein, did use, carry, and brandish a firearm during and in relation to a
crime of violence for which defendant may be prosecuted in a court of the United
States, namely, carjacking, in violation of Title 18, United States Code, Section 2119,
as set forth in Count One of this Indictment;

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

COUNT THREE

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about May 10, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

MAURICE D. LEE, JR.,

defendant herein, by intimidation, took from the person and presence of a bank employee approximately \$10,000 in United States currency belonging to, and in the care, custody, control, management, and possession of Credit Union 1, located at 750 South Halsted Street, Chicago, Illinois, the deposits of which were then insured by the National Credit Union Administration;

In violation of Title 18, United States Code, Section 2113(a).

COUNT FOUR

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about May 10, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

MAURICE D. LEE, JR.,

defendant herein, did use, carry, and brandish a firearm during and in relation to a
crime of violence for which defendant may be prosecuted in a court of the United
States, namely, bank robbery, in violation of Title 18, United States Code, Section
2113(a), as set forth in Count Three of this Indictment;

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

COUNT FIVE

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about May 17, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

MAURICE D. LEE, JR.,

defendant herein, with intent to cause death and serious bodily harm, took a motor vehicle, namely, a 2012 Toyota Prius, 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(1).

COUNT SIX

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about May 10, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

MAURICE D. LEE, JR.,

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

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

COUNT SEVEN

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about May 17, 2024, at Chicago, in the Northern District of Illinois, Eastern Division,

MAURICE D. LEE, JR.,

defendant herein, by intimidation, took from the person and presence of a bank employee approximately \$12,500 in United States currency belonging to, and in the care, custody, control, management, and possession of Credit Union 1, located at 828 South Wolcott Avenue, Chicago, Illinois, the deposits of which were then insured by the National Credit Union Administration;

In violation of Title 18, United States Code, Section 2113(a).

COUNT EIGHT

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about May 10, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

MAURICE D. LEE, JR.,

defendant herein, did use, carry, and brandish a firearm during and in relation to a
crime of violence for which defendant may be prosecuted in a court of the United
States, namely, bank robbery, in violation of Title 18, United States Code, Section
2113(a), as set forth in Count Seven of this Indictment.

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

A TRUE BILL:

FOREPERSON

Signed by Christine O'Neill on behalf of the
UNITED STATES ATTORNEY