

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

EARRIOUS MOORE

No.

Violations: Title 18, United States
Code, Sections 2119(1), 2119(2),
924(c)(1)(A)(ii) and 924(c)(1)(A)(iii)

COUNT ONE

The SPECIAL DECEMBER 2017 GRAND JURY charges:

On or about April 26, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

EARRIOUS MOORE,

defendant herein, with the intent to cause serious bodily harm, took by force, violence
and intimidation, a motor vehicle, namely a 2011 Jeep Patriot Sport, that had been
transported, shipped, and received in interstate commerce, from the person and
presence of Victim A;

In violation of Title 18, United States Code, Section 2119(1).

COUNT TWO

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about April 26, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

EARRIOUS MOORE,

defendant herein, did use, carry and brandish a firearm, namely a loaded .40 caliber Smith & Wesson semi-automatic pistol bearing serial number DVR9642 with an extended magazine, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, taking a motor vehicle by force, violence and intimidation with intent to cause serious bodily harm, in violation of Title 18, United States Code, Section 2119, as charged in Count One of this Indictment;

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

COUNT THREE

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about April 26, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

EARRIOUS MOORE,

defendant herein, with the intent to cause serious bodily harm, took by force, violence and intimidation, a motor vehicle, namely a 2009 Jaguar XF, that had been transported, shipped, and received in interstate commerce, from the person and presence of Victim B;

In violation of Title 18, United States Code, Section 2119(1).

COUNT FOUR

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about April 26, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

EARRIOUS MOORE,

defendant herein, did use, carry and brandish a firearm, namely a loaded .40 caliber Smith & Wesson semi-automatic pistol bearing serial number DVR9642 with an extended magazine, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, taking a motor vehicle by force, violence and intimidation with intent to cause serious bodily harm, in violation of Title 18, United States Code, Section 2119, as charged in Count Three of this Indictment;

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

COUNT FIVE

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about April 26, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

EARRIOUS MOORE,

defendant herein, with the intent to cause serious bodily harm, took by force, violence and intimidation, a motor vehicle, namely a 2016 Ford Escape SE, that had been transported, shipped, and received in interstate commerce, from the person and presence of Victim C;

In violation of Title 18, United States Code, Section 2119(1).

COUNT SIX

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about April 26, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

EARRIOUS MOORE,

defendant herein, did use, carry and brandish a firearm, namely a loaded .40 caliber Smith & Wesson semi-automatic pistol bearing serial number DVR9642 with an extended magazine, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, taking a motor vehicle by force, violence and intimidation with intent to cause serious bodily harm, in violation of Title 18, United States Code, Section 2119, as charged in Count Five of this Indictment;

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

COUNT SEVEN

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about April 26, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

EARRIOUS MOORE,

defendant herein, with the intent to cause serious bodily harm, did attempt to take
by force, violence and intimidation, a motor vehicle, namely a 2010 Nissan Maxima,
that had been transported, shipped, and received in interstate commerce, from the
person and presence of Victim D;

In violation of Title 18, United States Code, Section 2119(2).

COUNT EIGHT

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about April 26, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

EARRIOUS MOORE,

defendant herein, did use, carry, brandish and discharge a firearm, namely a loaded .40 caliber Smith & Wesson semi-automatic pistol bearing serial number DVR9642 with an extended magazine, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, taking a motor vehicle by force, violence and intimidation with intent to cause serious bodily harm, in violation of Title 18, United States Code, Section 2119, as charged in Count Seven of this Indictment;

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

COUNT NINE

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about April 26, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

EARRIOUS MOORE,

defendant herein, with the intent to cause serious bodily harm, did attempt to take
by force, violence and intimidation, a motor vehicle, namely a 2016 Mercedes Benz
S550 4MATIC, that had been transported, shipped, and received in interstate
commerce, from the person and presence of Victim F;

In violation of Title 18, United States Code, Section 2119(2).

COUNT TEN

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

On or about April 26, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

EARRIOUS MOORE,

defendant herein, did use, carry, brandish and discharge a firearm, namely a loaded .40 caliber Smith & Wesson semi-automatic pistol bearing serial number DVR9642 with an extended magazine, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, taking a motor vehicle by force, violence and intimidation with intent to cause serious bodily harm, in violation of Title 18, United States Code, Section 2119, as charged in Count Nine of this Indictment;

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

FORFEITURE ALLEGATION

The SPECIAL DECEMBER 2017 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 924(c)(1)(A), as set forth in this Indictment, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to:

a. one .40 caliber Smith & Wesson semi-automatic pistol bearing serial number DVR9642 with an extended magazine, and ammunition.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY