

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JAMES SAUNDERS,
JUMONTA MOORE,
MARCUS INGRAM, and
DERRICK CLAIBORNE

No. 18 CR 797

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

Superseding Indictment

COUNT ONE

The SPECIAL JUNE 2018 GRAND JURY charges:

Beginning no later than on or about May 14, 2018, and continuing until on or about November 2, 2018, at Chicago, in the Northern District of Illinois, Eastern Division,

JAMES SAUNDERS,

defendant herein, not being a licensed dealer within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms;

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

COUNT TWO

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about May 14, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

JAMES SAUNDERS,

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a black Jimenez Arms, JA Nine, 9mm semiautomatic pistol, bearing serial number 089199, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about June 20, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

JUMONTA MOORE,

defendant herein, who was then under indictment for a crime punishable by a term of imprisonment exceeding one year, did knowingly transport in interstate commerce from Missouri to Illinois a firearm, namely, a black Sig Sauer Arms, P250, .40 caliber semiautomatic pistol, bearing serial number EAK211207, and a black and green Glock 27, .40 caliber semiautomatic pistol, bearing serial number XLZ685, which firearm had been shipped and transported in interstate commerce;

In violation of Title 18, United States Code, Section 922(n).

COUNT FOUR

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about June 20, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

JAMES SAUNDERS,

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a black Sig Sauer Arms, P250, .40 caliber semiautomatic pistol, bearing serial number EAK211207, and a black and green Glock 27, .40 caliber semiautomatic pistol, bearing serial number XLZ685, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about September 23, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

MARCUS INGRAM,

defendant herein, who was then under indictment for a crime punishable by a term of imprisonment exceeding one year, did knowingly transport in interstate commerce from Missouri to Illinois a firearm, namely, a Kel-Tec, PF-9, 9mm pistol, bearing serial number SFF06, and an ATI, Omni Hybrid, 5.56mm pistol, bearing serial number NS177182, which firearm had been shipped and transported in interstate commerce;

In violation of Title 18, United States Code, Section 922(n).

COUNT SIX

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about September 23, 2018, at Chicago, in the Northern District of Illinois, Eastern Division,

JAMES SAUNDERS,

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Kel-Tec, PF-9, 9mm pistol, bearing serial number SFF06, and an ATI, Omni Hybrid, 5.56mm pistol, bearing serial number NS177182, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about October 12, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

MARCUS INGRAM,

defendant herein, who was then under indictment for a crime punishable by a term of imprisonment exceeding one year, did knowingly transport in interstate commerce from Missouri to Illinois a firearm, namely, a Smith and Wesson, SD9, 9mm pistol, bearing serial number FZX4239, a Smith and Wesson, SD9, 9mm pistol, bearing serial number FZY3342, and a Ruger, Security-9, 9mm pistol, bearing serial number 38188797, which firearm had been shipped and transported in interstate commerce;

In violation of Title 18, United States Code, Section 922(n).

COUNT EIGHT

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about October 12, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

JAMES SAUNDERS,

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Smith and Wesson, SD9, 9mm pistol, bearing serial number FZX4239, a Smith and Wesson, SD9, 9mm pistol, bearing serial number FZY3342, and a Ruger, Security-9, 9mm pistol, bearing serial number 38188797, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT NINE

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about November 2, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

JAMES SAUNDERS,

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Smith & Wesson, M&P 40 Shield, .40 caliber pistol, bearing serial number HVH0905, a Taurus, PT111 G2, 9mm pistol, bearing serial number TKT05125, and a Canik, TP9V2, 9mm pistol, bearing serial number 16AI02701, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about November 2, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

DERRICK CLAIBORNE,

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Smith & Wesson, M&P 40 Shield, .40 caliber pistol, bearing serial number HVH0905, a Taurus, PT111 G2, 9mm pistol, bearing serial number TKT05125, and a Canik, TP9V2, 9mm pistol, bearing serial number 16AI02701, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The SPECIAL JUNE 2018 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g)(1), as set forth in this Indictment, defendants JAMES SAUNDERS and DERRICK CLAIBORNE 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 Smith & Wesson, M&P 40 Shield, .40 caliber pistol, bearing serial number HVH0905; a Taurus, PT111 G2, 9mm pistol, bearing serial number TKT05125; a Canik, TP9V2, 9mm pistol, bearing serial number 16AI02701; and associated ammunition.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY