

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 18 CR 758
v.)	
)	Violations: Title 18, United
PIERRE ROBINSON and)	States Code, Sections
DERRICK SWANSON)	1959(a)(1), 922(g), and 2.
)	
)	<u>Superseding Indictment</u>

COUNT ONE

The SPECIAL JANUARY 2019 GRAND JURY charges:

At times material to this Indictment:

1. The defendants, and others known and unknown, were members and associates of the “Evans Mob” Street Gang, also known as “GuttaGang” and “HitzSquad,” a criminal organization whose members and associates engaged in acts of violence, including murder, attempted murder, assault with a dangerous weapon, and assault resulting in serious injury, and offenses involving narcotics trafficking, in violation of Title 21, United States Code, Sections 841 and 846, and which operated in the South Side of Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere.

2. The Evans Mob, including its leadership, membership, and associates, constituted an “enterprise,” as defined in Title 18, United States Code, Section

1959(b)(2), 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 Evans Mob enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

4. The purposes of the 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, murder, attempted murder, assault with a dangerous weapon, assault resulting in serious injury, other acts of violence, and illegal trafficking in controlled substances;

b. Promoting and enhancing the enterprise and its members' and associates' activities, including by publicly claiming responsibility for acts of violence committed by the enterprise and taunting rival gang members; and

c. Taking steps designed to prevent law enforcement's detection of the enterprise's criminal activities.

5. At times relevant to this Indictment, the Evans Mob, through its leadership, membership and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely:

a. Acts involving murder, in violation of the laws of the State of Illinois; and

b. Offenses involving narcotics trafficking, in violation of Title 21, United States Code, Sections 841 and 846.

6. On or about December 23, 2014, at Chicago, in the Northern District of Illinois, Eastern Division,

PIERRE ROBINSON,

defendant herein, for the purpose of maintaining and increasing position in the Evans Mob, an enterprise engaged in racketeering activity, did knowingly and intentionally commit the murder of an individual, namely, Glenn Houston, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/9-1, 5/5-1, and 5/5-2);

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

NOTICE OF SPECIAL FINDINGS

7. The defendant Pierre Robinson:
 - a. was eighteen years of age or older at the time of the offense (Title 18, United States Code, Section 3591(a)(2));
 - b. intentionally killed the victim (Title 18, United States Code, Section 3591(a)(2)(A));
 - c. intentionally inflicted serious bodily injury that resulted in the death of the victim (Title 18, United States Code, Section 3591(a)(2)(B));
 - d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
 - e. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));
 - f. in the commission of the offense, knowingly created a grave risk of death to 1 or more persons in addition to the victim (Title 18, United States Code, Section 3592(c)(5)); and

g. committed the offense after substantial planning and premeditation to cause the death of the victim (Title 18, United States Code, Section 3592(c)(9)).

COUNT TWO

The SPECIAL JANUARY 2019 GRAND JURY further charges:

1. Paragraphs 1 through 5 of Count One are realleged here.
2. On or about October 2, 2018, at Chicago, in the Northern District of Illinois, Eastern Division,

DERRICK SWANSON,

defendant herein, for the purpose of maintaining and increasing position in the Evans Mob, an enterprise engaged in racketeering activity, did knowingly and intentionally commit the murder of an individual, namely, Anthony Carter, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/9-1, 5/5-1, and 5/5-2);

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

NOTICE OF SPECIAL FINDINGS

3. The defendant Derrick Swanson:
 - a. was eighteen years of age or older at the time of the offense (Title 18, United States Code, Section 3591(a)(2));
 - b. intentionally killed the victim (Title 18, United States Code, Section 3591(a)(2)(A));
 - c. intentionally inflicted serious bodily injury that resulted in the death of the victim (Title 18, United States Code, Section 3591(a)(2)(B));
 - d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
 - e. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));
 - f. in the commission of the offense, knowingly created a grave risk of death to 1 or more persons in addition to the victim (Title 18, United States Code, Section 3592(c)(5)); and

g. committed the offense after substantial planning and premeditation to cause the death of the victim (Title 18, United States Code, Section 3592(c)(9)).

COUNT THREE

The SPECIAL JANUARY 2019 GRAND JURY further charges:

Beginning on or about October 2, 2018, and continuing until on or about October 11, 2018, at Chicago, in the Northern District of Illinois, Eastern Division,

DERRICK SWANSON,

defendant herein, previously having 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 loaded 9 millimeter Beretta model 92F handgun, bearing an obliterated serial number, which firearm had traveled in interstate commerce prior to the defendant's possession of the firearm;

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

A TRUE BILL:

F O R E P E R S O N

UNITED STATES ATTORNEY