UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA)
) <u>UNDER SEAL</u>
V.)
) No.
KELVIN EVERETT,)
also known as "Wood,") Violations: 18 U.S.C. § 922(g)(1); 18) U.S.C. § 924(c)(1)(A); 18 U.S.C. §) 1951(a)
GREGORY BLACKWELL,	
also known as "Gugu,"	
QUINCY WRIGHT,)
also known as "Q," and)
JERRY PEOPLES,)
also known as "Boo")

COUNT ONE

The SPECIAL JUNE 2018 Grand Jury charges:

Beginning in or around June 2017, and continuing until on or about June 13,

2017, at Chicago and Bridgeview, in the Northern District of Illinois, Eastern Division, and elsewhere,

KELVIN EVERETT, also known as "Wood," GREGORY BLACKWELL, also known as "Gugu," QUINCY WRIGHT, also known as "Q," and JERRY PEOPLES, also known as "Boo,"

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, to obstruct, delay, and affect "commerce" and the movement of any article in commerce by robbery, as "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b), namely, the robbery of Individual A, who was involved in the distribution of a controlled substance, namely marijuana;

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about June 13, 2017, at Bridgeview, in the Northern District of Illinois, Eastern Division,

> KELVIN EVERETT, also known as "Wood," GREGORY BLACKWELL, also known as "Gugu," QUINCY WRIGHT, also known as "Q," and JERRY PEOPLES, also known as "Boo,"

defendants herein, did knowingly attempt to obstruct, delay, and affect "commerce" and the movement of articles and commodities in such commerce, by robbery, as "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b), in that the defendants did attempt to unlawfully rob Individual A, who was involved in the distribution of a controlled substance, namely marijuana;

In violation of Title 18, United States Code, Section 1951(a) and 2.

COUNT THREE

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about June 13, 2017, at Bridgeview, in the Northern District of Illinois, Eastern Division,

> KELVIN EVERETT, also known as "Wood," GREGORY BLACKWELL, also known as "Gugu," QUINCY WRIGHT, also known as "Q," and JERRY PEOPLES, also known as "Boo,"

defendants herein, knowingly possessed a firearm, namely, a loaded Diamondback Arms, model DB-15SB, .223 caliber rifle, with serial number DB-1806174; and a loaded .40 caliber Glock handgun, with serial number EFC473US, in furtherance of a crime of violence for which they each may be prosecuted in a court of the United States, namely, an attempted robbery affecting commerce in violation of Title 18, United States Code, Section 1951(a), as set forth in Count Two of this Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT FOUR

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about June 13, 2017, at Bridgeview, in the Northern District of Illinois, Eastern Division,

> KELVIN EVERETT, also known as "Wood," GREGORY BLACKWELL, also known as "Gugu," and QUINCY WRIGHT, also known as "Q,"

defendants herein, each 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 loaded Diamondback Arms, model DB-15SB, .223 caliber rifle, with serial number DB-1806174; and a loaded .40 caliber Glock handgun, with serial number EFC473US, which firearm had traveled in interstate commerce prior to each defendants' possession of the firearm;

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

FORFEITURE ALLEGATION

The SPECIAL JUNE 2018 GRAND JURY further alleges:

1. The allegations contained in this Indictment are incorporated here by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

As a result of their violations of Title 18, United States Code, Sections
 922(g)(1), 924(c), and 1951(a) as alleged in the foregoing Indictment,

KELVIN EVERETT, also known as "Wood," GREGORY BLACKWELL, also known as "Gugu," and QUINCY WRIGHT, also known as "Q," and JERRY PEOPLES, also known as "Boo,"

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all right, title, and interest they may have in any property involved in the charged offense.

3. The interest of the defendants subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) includes, but is not limited to (1) a Diamondback Arms, model DB-15SB, 223 caliber rifle, with serial number DB-1806174; (2) and a .40 caliber Glock handgun, with serial number EFC473US,

All pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY