

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ELIAS QUINONES-FIGUEROA

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

UNDER SEAL

COUNT ONE

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

On or about May 27, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

ELIAS QUINONES-FIGUEROA,

defendant herein, with intent to cause death and serious bodily harm, took by force,
violence and intimidation, a motor vehicle, namely, a 2008 Chevrolet Tahoe, 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, Sections 2119 and 2.

COUNT TWO

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about May 27, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

ELIAS QUINONES-FIGUEROA,

defendant herein, did use, carry, and brandish firearms, namely a .22 caliber Rohm RG 14 revolver bearing serial number 31452, and a .380 caliber Taurus PT 138 Pro Millennium pistol bearing serial number KBR35052, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, carjacking, 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, Sections 924(c)(1)(A) and 2.

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 924(c) or Section 2119, as set forth in this Indictment, defendant shall forfeit to the United States of America, any firearm and ammunition:

a. involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c); and

b. found in the possession or under the immediate control of the defendant at the time of arrest, upon conviction of any offense for committing and attempting to commit any felony involving the use of threats, force, and violence, and perpetrated in whole or in part by the use of firearms, as provided in 18 U.S.C. § 3665.

2. The property to be forfeited includes but is not limited to a .22 caliber Rohm RG 14 revolver bearing serial number 31452, a .380 caliber Taurus PT 138 Pro Millennium pistol bearing serial number KBR35052, and associated ammunition.

A TRUE BILL:

FOREPERSON

Signed by Timothy J. Storino on behalf of the
UNITED STATES ATTORNEY