

FILED

NOV 17 2020 JL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

No. 19 CR 932

v.

Violations: Title 18, United States  
Code, Sections 912, 922(g)(1),  
1201(a)(1), 1201(c), and 1201(d)

SEDGWICK WILLIAMS,  
also known as "Sed,"  
IVAN AYERS,  
also known as "Mook," and  
TAI HON LA

Judge Jorge L. Alonso  
**MAGISTRATE JUDGE SCHENKIER**  
**SUPERSEDING INDICTMENT**

**COUNT ONE**

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

Beginning no later than on or about August 14, 2019, and continuing through  
on or about December 12, 2019, in the Northern District of Illinois, Eastern Division,

SEDGWICK WILLIAMS, also known as "Sed,"  
IVAN AYERS, also known as "Mook," and  
TAI HON LA,

defendants herein, did conspire with each other, and others known and unknown to  
the grand jury, to knowingly and unlawfully seize, confine, inveigle, decoy, kidnap,  
abduct, carry away, and hold for ransom and reward and otherwise, multiple persons,  
including Victims 1–6, and to use means, facilities and instrumentalities of interstate  
commerce in committing and in furtherance of the offense, in violation of Title 18,  
United States Code, Section 1201(a)(1).

1. It was part of the conspiracy that defendants identified and caused others to identify potential victims whom they believed possessed large amounts of money or other valuable items, such as jewelry, had access to such assets, or had family members with access to such assets, which defendants could obtain by the use and threat of physical force after having seized, confined, and/or abducted those victims.

2. It was further part of the conspiracy that defendants obtained and caused others to obtain firearms, handcuffs, police-style radios, and police-style clothing, including ballistic vests and "DEA" logo apparel, in order to impersonate law enforcement officers when approaching their victims.

3. It was further part of the conspiracy that defendants misrepresented, concealed, and hid, caused to be misrepresented, concealed, and hidden, and attempted to misrepresent, conceal, and hide the nature and purpose of the conspiracy.

#### Overt Acts

4. It was further part of the conspiracy that defendants committed one or more of the following acts, among others, in furtherance of and to effect the objects of the conspiracy:

a. On or about October 17, 2019, defendants travelled by cars to Naperville, Illinois.

b. On or about October 17, 2019, defendants, pretending to be law enforcement officers, seized and abducted, and caused to be seized and abducted, Victim 1 outside of Victim 1's electronics store in Naperville, Illinois.

c. On or about October 17, 2019, defendants, pretending to be law enforcement officers, restrained, and caused to be restrained, Victim 1 with handcuffs.

d. On or about October 17, 2019, following Victim 1's abduction outside of his electronics store, AYERS texted Individual A, "Need somewhere to take him."

e. On or about October 17, 2019, defendants transported, and caused to be transported, Victim 1 in a Chevrolet Malibu to another location outside of Naperville, Illinois, where they confined Victim 1.

f. On or about October 17, 2019, defendants stole, and caused to be stolen, U.S. currency and merchandise from Victim 1's electronics store while Victim 1 was held captive at a location outside of Naperville, Illinois.

g. Between on or about October 17, 2019, and on or about October 18, 2019, defendants physically harmed, and caused to be physically harmed, Victim 1 while they held Victim 1 captive.

h. On or about November 14, 2019, AYERS instructed Individual B to send him Victim 2's address and a photograph of Victim 2.

i. On or about November 15, 2019, AYERS took a photograph of Victim 2's residence.

j. On or about November 16, 2019, AYERS and WILLIAMS drove behind Victim 2 in a Chevrolet Impala and, pretending to be federal law enforcement officers, activated emergency lights on the dashboard area of the Chevrolet Impala causing Victim 2 to pull over in the driveway of Victim 2's residence in Westchester, Illinois.

k. On or about November 16, 2019, AYERS and WILLIAMS, pretending to be federal law enforcement officers, seized and confined, and caused to be seized and confined, Victim 2 at his residence in Westchester, Illinois, having forced Victim 2 into his residence and into the basement of his residence.

l. On or about November 16, 2019, AYERS and WILLIAMS, pretending to be federal law enforcement officers, also seized and confined, and caused to be seized and confined, Victim 3, Victim 4, and Victim 5 at Victim 2's residence in Westchester, Illinois.

m. On or about November 16, 2019, AYERS and WILLIAMS stole, and caused to be stolen, U.S. currency and jewelry from Victim 2.

n. On or about December 11, 2019, Individual C texted WILLIAMS the address for Victim 6's residence in South Holland, Illinois.

o. On or about December 11, 2019, AYERS travelled by car to the vicinity of the 7500 block of South Lafayette Avenue in Chicago, Illinois, and got into a Chevrolet Impala driven by WILLIAMS.

p. On or about December 11, 2019, LA travelled by car to the vicinity of the 7500 block of South Lafayette Avenue in Chicago, Illinois, and got into a Chevrolet Impala driven by WILLIAMS.

q. On or about December 11, 2019, defendants drove in the Chevrolet Impala to Victim 6's residence in South Holland, Illinois.

r. On or about December 11, 2019, LA and Individual D, each armed with a firearm and pretending to be law enforcement officers, approached the front door of Victim 6's residence in South Holland, Illinois, and demanded entry.

In violation of Title 18, United States Code, Section 1201(c).



COUNT TWO

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

Beginning on or about October 17, 2019, and continuing until on or about October 18, 2019, at Naperville and Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SEDGWICK WILLIAMS, also known as "Sed,"  
IVAN AYERS, also known as "Mook," and  
TAI HON LA,

defendants herein, did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, carry away, and hold for ransom and reward and otherwise Victim 1, and used a means, facility, and instrumentality of interstate commerce in furtherance of the commission of the offense;

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

**COUNT THREE**

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about November 16, 2019, at Westchester, in the Northern District of Illinois, Eastern Division,

SEDGWICK WILLIAMS, also known as "Sed," and  
IVAN AYERS, also known as "Mook,"

defendants herein, did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, carry away, and hold for ransom and reward and otherwise Victim 2, and used a means, facility, and instrumentality of interstate commerce in furtherance of the commission of the offense;

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

**COUNT FOUR**

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about November 16, 2019, at Westchester, in the Northern District of Illinois, Eastern Division,

SEDGWICK WILLIAMS, also known as "Sed," and  
IVAN AYERS, also known as "Mook,"

defendants herein, did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, carry away, and hold for ransom and reward and otherwise Victim 3, and used a means, facility, and instrumentality of interstate commerce in furtherance of the commission of the offense;

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.



COUNT FIVE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about November 16, 2019, at Westchester, in the Northern District of Illinois, Eastern Division,

SEDGWICK WILLIAMS, also known as "Sed," and  
IVAN AYERS, also known as "Mook,"

defendants herein, did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, carry away, and hold for ransom and reward and otherwise Victim 4, and used a means, facility, and instrumentality of interstate commerce in furtherance of the commission of the offense;

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

**COUNT SIX**

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about November 16, 2019, at Westchester, in the Northern District of Illinois, Eastern Division,

SEDGWICK WILLIAMS, also known as "Sed," and  
IVAN AYERS, also known as "Mook,"

defendants herein, did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, carry away, and hold for ransom and reward and otherwise Victim 5, and used a means, facility, and instrumentality of interstate commerce in furtherance of the commission of the offense;

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

COUNT SEVEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about November 16, 2019, at Westchester, in the Northern District of Illinois, Eastern Division,

SEDGWICK WILLIAMS, also known as "Sed," and  
IVAN AYERS, also known as "Mook,"

defendants herein, falsely assumed and pretended to be officers and employees acting under the authority of the United States and a department and any agency thereof, namely, the United States Drug Enforcement Administration, and acted as such;

In violation of Title 18, United States Code, Sections 912 and 2.

**COUNT EIGHT**

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about December 11, 2019, at South Holland, in the Northern District of Illinois, Eastern Division,

SEDGWICK WILLIAMS, also known as "Sed,"  
IVAN AYERS, also known as "Mook," and  
TAI HON LA,

defendants herein, did attempt to unlawfully seize, confine, inveigle, decoy, kidnap, abduct, carry away, and hold for ransom and reward and otherwise Victim 6, and to use a means, facility, and instrumentality of interstate commerce in furtherance of the commission of the offense;

In violation of Title 18, United States Code, Sections 1201(d) and 2.

COUNT NINE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about December 11, 2019, at South Holland and Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SEDGWICK WILLIAMS, also known as "Sed,"  
IVAN AYERS, also known as "Mook," and  
TAI HON LA,

defendants herein, knowing that they had 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 Smith and Wesson, Model SD9VE, 9mm semiautomatic pistol, bearing serial number FYW1476, and ammunition, namely, 10 rounds of Hornady 9mm Luger ammunition, which firearm and ammunition had traveled in interstate commerce prior to defendants' possession of them;

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

**FORFEITURE ALLEGATION**

The SPECIAL NOVEMBER 2019 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g), as set forth in this Superseding Indictment, defendants shall forfeit to the United States of America any firearm and ammunition involved in and used in the offenses, 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 and Wesson, Model SD9VE, 9mm semiautomatic pistol, bearing serial number FYW1476, associated ammunition, a 9mm semiautomatic pistol with a Glock-model slide, and 10 rounds of Hornady 9mm Luger ammunition.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

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