

FILED
2/25/2021

CRL

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

FALANDIS RUSSELL and
TERRANCE WILLIAMS

21 CR 107

Violation: Title 18, United States Code,
Sections 1951(a)

JUDGE CHANG
MAGISTRATE JUDGE GILBERT

COUNT ONE

The SPECIAL JANUARY 2020 GRAND JURY charges:

1. Beginning in or around July 2020, and continuing until on or about January 22, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

FALANDIS RUSSELL and
TERRANCE WILLIAMS,

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 articles and commodities in commerce, by robbery, as "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b), that is, to unlawfully take and obtain property from the person and in the presence of employees of several businesses against those employees' will, by means of actual and threatened force, violence, and fear of injury to those employees, in violation of Title 18, United States Code, Section 1951(a).

2. It was part of and in furtherance of the conspiracy that defendants RUSSELL and WILLIAMS agreed to rob various pawn shops and retail businesses

in Chicago and surrounding suburbs in the Northern District of Illinois and elsewhere.

3. It was further part of the conspiracy that defendants RUSSELL and WILLIAMS identified certain businesses, including pawn shops, jewelry stores, and title loan businesses, to target for robberies.

4. It was further part of the conspiracy that defendants RUSSELL and WILLIAMS used vehicles for transportation to and from the location of the robberies, including a 2012 Dodge Avenger, a 2008 Jeep Compass, a 2014 Dodge Avenger, and a 2004 Chrysler Crossfire.

5. It was further part of the conspiracy that defendants RUSSELL and WILLIAMS concealed their identities during the robberies by wearing hoods, masks, gloves, and other items.

6. It was further part of the conspiracy that, during some of the robberies, defendants RUSSELL and WILLIAMS used bricks or rocks to break glass cases in the business and take valuable items, such as jewelry.

7. It was further part of the conspiracy that defendants RUSSELL and WILLIAMS took United States currency and jewelry from the employees of the businesses and the businesses, by force and threat of force, violence, and fear of injury to those employees, including by brandishing dangerous weapons.

8. It was further part of the conspiracy that:

a. on or about July 31, 2020, RUSSELL and others robbed Cash America, located at 1841 River Oaks Drive, Calumet City, Illinois;

b. on or about August 10, 2020, RUSSELL and others robbed EZ Pawn, located at 6153 South Archer Street, Summit, Illinois;

c. on or about August 10, 2020, RUSSELL and others robbed Cash America, located at 4558 South Cicero Avenue, Chicago, Illinois;

d. on or about August 28, 2020, RUSSELL and WILLIAMS robbed Midwest Title & Loan, located at 8300 South Cicero Avenue, Burbank, Illinois;

e. on or about August 28, 2020, RUSSELL and WILLIAMS robbed Cash America, located at 6337 South Kedzie Avenue, Chicago, Illinois;

f. on or about September 25, 2020, RUSSELL, WILLIAMS, and others robbed Helzberg Diamonds, located at 643 East Boughton Road, Bolingbrook, Illinois;

g. on or about October 13, 2020, RUSSELL, WILLIAMS, and others robbed EZ Pawn, located at 315 West Rollins Road, Round Lake Beach, Illinois;

h. on or about October 21, 2020, RUSSELL and WILLIAMS robbed EZ Pawn, located at 4824 South Ashland Avenue, Chicago, Illinois;

i. on or about November 6, 2020, RUSSELL, WILLIAMS, and others robbed Cash America, located at 3243 West Lawrence Avenue, Chicago, Illinois;

j. on or about December 16, 2020, RUSSELL, WILLIAMS, and others robbed Cash America, located at 6817 Indianapolis Boulevard, Hammond, Indiana;

k. on or about January 19, 2021, RUSSELL and others robbed EZ Pawn, located at 901 East Irving Park Road, Streamwood, Illinois; and

l. on or about January 22, 2021, RUSSELL and WILLIAMS robbed EZ Pawn, located at 1718 West Algonquin Road, Arlington Heights, Illinois;

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

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2020 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1951, as set forth in this Indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to:

- a. a personal money judgment in the amount of approximately \$22,254.22; and
- b. items of jewelry valued at approximately \$305,415.21.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code Section 853(p).

A TRUE BILL:

FOREPERSON

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