

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No.
v.)	
)	Violations: Title 18, United States
TERRANCE ELKINS and)	Code, Sections 922(d)(1)
BENITTA GROSS)	and 922(g)(1)

COUNT ONE

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

On or about June 20, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

TERRANCE ELKINS,

defendant herein, knowing he previously had 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 SCCY Industries, model CPZ-1,
9mm semi-automatic pistol, bearing serial number 231096, which firearm 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).

COUNT TWO

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about June 20, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

BENITTA GROSS,

defendant herein, did knowingly dispose of a firearm, namely a SCCY Industries,
model CPZ-1, 9mm semi-automatic pistol, bearing serial number 231096, to Terrance
Elkins, knowing and having reasonable cause to believe that Terrance Elkins had
been convicted of a crime punishable by a term of imprisonment exceeding one year;

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

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 922(d) and 922(g), as set forth in Count One and Count Two of this Indictment, defendants shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, 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 SCCY Industries, model CPZ-1, 9mm semi-automatic pistol, bearing serial number 231096, and associated ammunition.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY