

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JAMAR JARVIS,
RAYNELL LANFORD,
JAMAAL ASHSAHEED, and
JAVION BUSH

Violations: Title 18, United States Code,
Sections 371, 2119, 2, 924(c)(1)(A), and 3

COUNT ONE

The SPECIAL JUNE 2018 GRAND JURY charges:

1. Beginning on or about October 17, 2018, and continuing until on or about October 18, 2018 at Chicago, in the Northern District of Illinois, Eastern Division,

JAMAR JARVIS,
RAYNELL LANFORD, and
JAMAAL ASHSAHEED,

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, with intent to cause serious bodily harm, to take a motor vehicle, which had been transported, shipped, and received in interstate commerce from the presence of another person by force and violence and by intimidation, in violation of Title 18, United States Code, Section 2119.

2. It was part of the conspiracy that the defendants JAMAR JARVIS, RAYNELL LANFORD, JAMAAL ASHSAHEED, and others known and unknown to

the Grand Jury, agreed to take a vehicle that had been transported, shipped or received in interstate commerce by force and violence and by intimidation.

3. It was further part of the conspiracy that the defendants JAMAR JARVIS, RAYNELL LANFORD, JAMAAL ASHSAHEED, and others known and unknown to the Grand Jury, obtained, possessed, and brandished a firearm, including a Kel-Tech P11, 9 mm Luger semiautomatic pistol bearing serial number AWR62, in connection with the taking of the motor vehicle.

4. It was further part of the conspiracy that the defendants JAMAR JARVIS, RAYNELL LANFORD, JAMAAL ASHSAHEED, and others known and unknown to the Grand Jury, did conceal and hide, and cause to be concealed and hidden, the purposes of acts done in furtherance of the conspiracy.

OVERT ACTS

5. In furtherance of the conspiracy and to accomplish the objectives of the conspiracy, defendants committed one or more overt acts in the Northern District of Illinois, and elsewhere, which overt acts included but were not limited to the following:

- (a) On or before October 17, 2018, defendant RAYNELL LANFORD obtained a firearm;
- (b) On or about October 17, 2018, in Chicago, defendant RAYNELL LANFORD attempted to open Victim A's locked car door;

- (c) On or about October 17, 2018, in Chicago, defendant RAYNELL LANFORD displayed a firearm to Victim A and attempted to take Victim A's vehicle by force, violence, and intimidation;
- (d) On or about October 17, 2018, in Chicago, defendant JAMAR JARVIS boarded a Chicago Transit Authority bus;
- (e) On or about October 17, 2018, in Chicago, defendant JAMAR JARVIS boarded a Chicago Transit Authority train;
- (f) On or about October 18, 2018, in Chicago, defendant JAMAR JARVIS brandished a firearm at Victim B, while Victim B was encircled by RAYNELL LANFORD, JAMAAL ASHSAHEED, and others known and unknown to the Grand Jury;
- (g) On or about October 18, 2018, in Chicago, defendants JAMAR JARVIS, RAYNELL LANFORD, JAMAAL ASHSAHEED, and others known and unknown to the Grand Jury, took Victim B's vehicle from the presence of Victim B by force, violence, and intimidation;
- (h) On or about October 18, 2018, in Chicago, defendants JAMAR JARVIS, RAYNELL LANFORD, JAMAAL ASHSAHEED, and others, known and unknown to the Grand Jury, drove Victim B's vehicle to a gas station located at 1221 S. Wabash in Chicago; and

(i) On or about October 18, 2018, in Chicago, defendants JAMAR JARVIS, RAYNELL LANFORD, JAMAAL ASHSAHEED, and others, known and unknown to the Grand Jury, entered the gas station store to purchase gas and a gas can for the vehicle stolen from Victim B.

In violation of Title 18, United States Code, Section 371.

COUNT TWO

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about October 17, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

RAYNELL LANFORD,

defendant herein, with intent to cause death and serious bodily harm, attempted to take a motor vehicle, namely, a 2010 Acura TSX, that had been transported, shipped, and received in interstate commerce from the person and presence of Victim A by force, violence, and intimidation;

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT THREE

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about October 17, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

RAYNELL LANFORD,

defendant herein, did use, carry, and brandish a firearm, 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 Two of this Indictment;

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

COUNT FOUR

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about October 18, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

JAMAR JARVIS,
RAYNELL LANFORD, and
JAMAAL ASHSAHEED,

defendants herein, with intent to cause death and serious bodily harm, took a motor vehicle, namely, a 2006 Lexus RX400H, that had been transported, shipped, and received in interstate and foreign commerce from the person and presence of Victim B by force, violence, and intimidation;

In violation of Title 18, United States Code, Section 2119 and 2.

COUNT FIVE

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about October 18, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

JAMAR JARVIS,
RAYNELL LANFORD, and
JAMAAL ASHSAHEED

defendants herein, did use, carry, and brandish a firearm, namely a Kel-Tech P11, 9 mm Luger semiautomatic pistol bearing serial number AWR62, during and in relation to a crime of violence for which they each 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 Four of this Indictment;

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

COUNT SIX

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about October 18, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

JAVION BUSH,

defendant herein, knowing that Raynell Lanford, Jamar Jarvis and Jamaal Ashsaheed had committed an offense against the United States, namely, carjacking, as designated in Title 18, United States Code, Section 2119, as charged in Count Four of this Indictment, did knowingly receive, relieve, comfort, and assist Raynell Lanford, Jamar Jarvis and Jamaal Ashsaheed in order to hinder and prevent the apprehension, trial, and punishment of Raynell Lanford, Jamar Jarvis and Jamaal Ashsaheed;

In violation of Title 18, United States Code Section 3.

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).

2. As a result of their violations of Title 18, United States Code, Sections 924(c)(1)(A) as alleged in Counts Three and Five of the foregoing Indictment,

JAMAR JARVIS,
RAYNELL LANFORD, and
JAMAAL ASHSAHEED,

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 property to be forfeited includes but is not limited to a Kel-tec P-11 9 millimeter semiautomatic pistol, bearing serial number AWR62, and associated ammunition.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY