

RECEIVED

8/11/2022

AK

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)

v.)

EDSON RESENDEZ, aka "Savage," and)
MAVERICK CELA, aka "G Reckless")

No. **1:22-cr-00395**
Judge John F. Kness
Magistrate Judge Maria Valdez

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

UNDER SEAL

COUNT ONE

The SPECIAL JULY 2021 GRAND JURY charges:

1. Beginning no later than on or about September 11, 2020, and continuing until on or about September 17, 2020, in Cook County, in the Northern District of Illinois, Eastern Division, and elsewhere,

EDSON RESENDEZ, aka "Savage," and
MAVERICK CELA, aka "G Reckless,"

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

2. It was part of the conspiracy that defendants EDSON RESENDEZ and MAVERICK CELA, and others known and unknown to the Grand Jury, agreed to use

firearms in order to take motor vehicles from the presence of another person by force and violence and by intimidation.

3. It was further part of the conspiracy that defendant EDSON RESENDEZ, and others known and unknown to the Grand Jury, obtained, possessed, and brandished a firearm in connection with the taking of a motor vehicle.

4. It was further part of the conspiracy that defendants EDSON RESENDEZ and MAVERICK CELA, 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 September 11, 2020, defendant EDSON RESENDEZ obtained a firearm;
- (b) On or about September 11, 2020, in Morton Grove, Illinois, defendants EDSON RESENDEZ and MAVERICK CELA and others known and unknown to the Grand Jury took Victim A's 2014 Chevrolet Sonic from the person and presence of Victim A by force, violence, and intimidation;

- (c) On or about September 12, 2020, defendants EDSON RESENDEZ and MAVERICK CELA, and others known and unknown to the Grand Jury, obtained a license plate from a stolen 2013 Chevy and affixed it to the stolen 2014 Chevy Sonic;
- (d) On or about September 13, 2020, defendants EDSON RESENDEZ and MAVERICK CELA, and others known and unknown to the Grand Jury, drove the stolen 2014 Chevy Sonic to Skokie, Illinois to steal another vehicle;
- (e) On or about September 13, 2020, in Skokie, defendant MAVERICK CELA drove the stolen 2014 Chevy Sonic in front of the driveway containing Victim B's 2014 Lexus GS350, and kept watch while defendant EDMOND RESENDEZ approached Victim B;
- (f) On or about September 13, 2020, in Skokie, defendant EDSON RESENDEZ brandished a firearm at Victim B;
- (g) On or about September 13, 2020, in Skokie, defendants EDSON RESENDEZ and MAVERICK CELA, and others known and unknown to the Grand Jury, took Victim B's 2014 Lexus GS350, from the person and presence of Victim B by force, violence, and intimidation;
- (h) On or about September 14, 2020, defendant MAVERICK CELA, and others known and unknown to the Grand Jury, disposed of the stolen 2014 Chevy

Sonic by lighting it on fire on the 6200 block of North Lincoln Avenue, in Chicago, Illinois;

- (i) On or about September 16, 2020, in Chicago, defendants EDSON RESENDEZ and MAVERICK CELA, and others known and unknown to the Grand Jury, disposed of the stolen 2014 Lexus GS350 on the 4800 block of South Hermitage Avenue, in Chicago, Illinois;

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

COUNT TWO

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about September 11, 2020, at Morton Grove, in the Northern District of Illinois, Eastern Division,

EDSON RESENDEZ, aka "Savage," and
MAVERICK CELA, aka "G Reckless,"

defendants herein, with intent to cause death and serious bodily harm, took a motor vehicle, namely a 2014 Chevrolet Sonic, that had been transported, shipped, and received in interstate and foreign 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 JULY 2021 GRAND JURY further charges:

On or about September 13, 2020, at Skokie, in the Northern District of Illinois,
Eastern Division,

EDSON RESENDEZ, aka "Savage," and
MAVERICK CELA, aka "G Reckless,"

defendants herein, with intent to cause death and serious bodily harm, took a motor vehicle, namely a 2014 Lexus GS350, that had been transported, shipped, and received in interstate and foreign 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 FOUR

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about September 13, 2020, at Skokie, in the Northern District of Illinois,
Eastern Division,

EDSON RESENDEZ, aka "Savage,"

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 Three of this Indictment;

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

A TRUE BILL:

FOREPERSON

signed by Sarah Streicker on behalf of the
UNITED STATES ATTORNEY