UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA

Case No. 24 CR 236

v.

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL Violations: Title 18, United States Code, Sections 1951(a) and 924(c)(1)(A)

COUNT ONE

The SPECIAL NOVEMBER 2023 GRAND JURY charges:

1. Beginning in or around November 2023, and continuing until on or about May 4, 2024, in the Northern District of Illinois, Eastern Division,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

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), in violation of Title 18, United States Code, Section 1951(a), that is, to unlawfully take and obtain United States currency and 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 the conspiracy that defendants HARRIS, FOX, and VEAL, and others known and unknown to the Grand Jury, agreed to rob various liquor stores, convenience stores, and bars, in the Northern District of Illinois.
- 3. It was further part of the conspiracy that defendants HARRIS, FOX, VEAL, and others known and unknown to the Grand Jury, obtained cars, including cars that had been stolen, to use in the robberies.
- 4. It was further part of the conspiracy that defendants HARRIS, FOX, VEAL, and others known and unknown to the Grand Jury, concealed their identities during the robberies by wearing hoods, masks, and other items.
- 5. It was further part of the conspiracy that defendants HARRIS, FOX, and VEAL, and others known and unknown to the Grand Jury, obtained, possessed, and brandished firearms in connection with the robberies.
- 6. It was further part of the conspiracy that defendants HARRIS, FOX, and VEAL, and others known and unknown to the Grand Jury, took United States currency from the employees and customers of the businesses and from the businesses by force and threat of force, violence, and fear of injury to those employees and customers.
 - 7. It was further part of the conspiracy that:
- a. On or about November 24, 2023, defendant VEAL and another coconspirator attempted to rob Super Saving Food, located at 4424 West Belmont Avenue in Chicago.

- b. On or about January 13, 2024, defendants HARRIS, FOX, and another coconspirator robbed Buchanas Food & Liquor, located at 1834 West 47th Street in Chicago.
- c. On or about January 15, 2024, defendants HARRIS, FOX, VEAL, and another coconspirator robbed Mr. P Beverage Depot, located at 2006 West Division Street, in Chicago, as charged in Count Two of this Indictment.
- d. On or about January 15, 2024, defendants HARRIS, FOX, VEAL, and a coconspirator robbed Before You Go Liquor, located at 1917 West Fullerton Avenue, in Chicago, as charged in Count Four of this Indictment.
- e. On or about January 15, 2024, defendants HARRIS, FOX, VEAL, and a coconspirator robbed Clybourn Market, located at 2807 North Clybourn Avenue, in Chicago, as charged n Count Six of this Indictment.
- 8. It was further part of the conspiracy that defendants HARRIS, FOX, and VEAL, and others known and unknown to the grand jury, obtained more than \$250,000 in United States currency through the robberies.

In violation of Title 18, United States Code, Section 1951.

COUNT TWO

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 15, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain United States currency from the person and in the presence of an employee of Mr. P Beverage Depot, located at 2006 West Division Street, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

In violation of Title 18, United States Code, Sections 1951(a).

COUNT THREE

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 15, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), 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 NOVEMBER 2023 GRAND JURY further charges:

On or about January 15, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain United States currency from the person and in the presence of an employee of Before You Go Liquor, located at 1917 West Fullerton Avenue, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

In violation of Title 18, United States Code, Sections 1951(a).

COUNT FIVE

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 15, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Four of this Indictment;

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

COUNT SIX

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 15, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, and others known and unknown to the Grand Jury, did obstruct, delay, and affect "commerce," and the movement of any article and commodity in commerce by "robbery," as defined in Title 18, United States Code, Section 1951(b), in that the defendants did unlawfully take and obtain United States currency from the person and in the presence of an employee of Clybourn Market, located at 2807 North Clybourn Avenue, in Chicago, against the employee's will, by means of actual and threatened force, and fear of injury to that employee;

In violation of Title 18, United States Code, Sections 1951(a).

COUNT SEVEN

The SPECIAL NOVEMBER 2023 GRAND JURY further charges:

On or about January 15, 2024, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL,

defendants herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, robbery affecting commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Six of this Indictment;

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

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2023 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) and 1951(a), as alleged in the foregoing Indictment,

ARDARIES HARRIS, JORDAN FOX, and ROOSEVELT VEAL.

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 interest of the defendants subject to forfeiture pursuant to Title 18 United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), includes but is not limited to property seized on or about January 22, 2024 and on or about May 11, 2024, including:
 - a. Approximately \$11,300 in United States currency;
 - A chrome Smith & Wesson .38 Special Revolver, bearing serial number
 AW279511 and associated ammunition;
 - c. A Glock 19 Gen 4 pistol bearing serial number ZGA101 and associated ammunition;

- d. A Glock 48 pistol bearing serial number BYGK813 and associated ammunition;
- e. An Intratec AB10 pistol bearing an obliterated serial number and associated ammunition;
- f. A Savage Stevens 940E shotgun bearing serial number P132206 and associated ammunition;
- g. A 3D printed Glock-style pistol receiver and associated ammunition;
- h. A Savage Stevens 84 rifle and associated ammunition;
- i. One box of Ammo Incorporated 9mm ammunition;
- j. One box of CCI-Blazer 9mm ammunition;
- k. One box of TulAmmo .45 caliber ammunition;
- 1. One box of Remington .40 caliber Smith & Wesson ammunition;
- m. One box of Remington 9mm ammunition;
- n. One box of Remington 0.22 caliber ammunition;
- o. One box of Hornady-American Gunner 10mm ammunition;
- p. One box of Hornady .40 caliber Smith & Wesson ammunition;
- q. One box of Herter's 9mm ammunition;
- r. One box of Sellier & Bellot 9mm ammunition;
- s. One box of Sig Sauer 9mm ammunition;
- t. One box of American Eagle .40 caliber Smith & Wesson ammunition;

- u. One box of Sears 20 gauge ammunition; and
- v. One box of Frontier .223 caliber ammunition

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FOREPERSON

Morris Pasqual by SME
ACTING UNITED STATES ATTORNEY