

FILED
2/1/2024

KG

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,"
MAVERICK CELA, aka "G Reckless," and
PREZILA APREZA

No. 22 CR 395

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

Superseding Indictment

JUDGE KNESS
MAGISTRATE JUDGE VALDEZ

COUNT ONE

The SPECIAL JANUARY 2023 GRAND JURY charges:

1. Beginning no later than on or about September 11, 2020, and continuing until on or about September 21, 2020, in Cook County, in the Northern District of Illinois, Eastern Division, and elsewhere,

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

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 sought to obtain motor vehicles for the purpose of committing other crimes, including murders, attempted

murders, additional carjackings, and obtaining property from the carjacking victims, including credit and debit cards.

3. It was further part of the conspiracy that defendants EDSON RESENDEZ, MAVERICK CELA, and PREZILA APREZA, and others known and unknown to the Grand Jury, used a firearm in order to take motor vehicles from the presence of another person by force and violence and by intimidation.

4. It was further part of the conspiracy that defendants obtained, possessed, brandished, and discharged a firearm in connection with the taking of a motor vehicle.

5. It was further part of the conspiracy that defendants EDSON RESENDEZ, MAVERICK CELA, and PREZILA APREZA, 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

6. 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, 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 11, 2020, in Skokie, Illinois, defendants EDSON RESENDEZ and MAVERICK CELA drove the stolen 2014 Chevrolet Sonic to a Burger King and used Victim A's credit card to purchase food from Burger King;
- (d) 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;
- (e) 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 obtain another vehicle;
- (f) On or about September 13, 2020, in Skokie, Illinois, defendant MAVERICK CELA drove the stolen 2014 Chevy Sonic in front of the driveway containing Victim B's 2014 Lexus GS350;
- (g) On or about September 13, 2020, in Skokie, Illinois, defendant EDSON RESENDEZ brandished a firearm at Victim B;

- (h) On or about September 13, 2020, in Skokie, Illinois, 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;
- (i) 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;
- (j) On or about September 16, 2020, in Chicago, Illinois, defendants EDSON RESENDEZ and MAVERICK CELA, and others known and unknown to the Grand Jury, abandoned the stolen 2014 Lexus GS350 on the 4800 block of North Hermitage Avenue, in Chicago, Illinois;
- (k) On or before September 16, 2020, defendant MAVERICK CELA obtained a firearm;
- (l) On or about September 16, 2020, in Skokie, Illinois, defendant PREZILA APREZA drove her Chevy Trailblazer towards Victim C's 2015 Hyundai Elantra;
- (m) On or about September 16, 2020, in Skokie, Illinois, defendants EDSON RESENDEZ, MAVERICK CELA, and PREZILA APREZA stole Victim C's 2015 Hyundai Elantra;

- (n) On or about September 16, 2020, defendants EDSON RESENDEZ and MAVERICK CELA drove the stolen 2015 Hyundai Elantra to Morton Grove to obtain another vehicle;
- (o) On or about September 16, 2020, defendants EDSON RESENDEZ and MAVERICK CELA, while driving the stolen 2015 Hyundai Elantra, parked next to Victim D's 2012 Chevy Traverse, intending to obtain that car;
- (p) On or about September 16, 2020, defendants EDSON RESENDEZ, MAVERICK CELA, PREZILA APREZA, and Individual A drove the stolen 2015 Hyundai Elantra to Skokie to obtain another vehicle;
- (q) On or about September 16, 2020, in Skokie, Illinois, a defendant brandished a firearm at Victim E;
- (r) On or about September 16, 2020, in Skokie, Illinois, defendants MAVERICK CELA, EDSON RESENDEZ, PREZILA APREZA, and another person known and unknown to the grand jury took Victim E's 2016 Mercedes C300, from the person and presence of Victim E by force, violence and intimidation;
- (s) On or about September 16, 2020, in Chicago, Illinois, defendants MAVERICK CELA and EDSON RESENDEZ drove the stolen 2016 Mercedes C300 to a Shell gas station at 5155 North Kimball;
- (t) On or about September 16, 2020, in Chicago, Illinois, defendants EDSON RESENDEZ and PREZILA APREZA used Victim E's credit card at a Shell

gas station at 5155 North Kimball, to put fuel in APREZA's Chevy Trailblazer;

(u) On or about September 16, 2020, in Chicago, Illinois, defendants EDSON RESENDEZ and PREZILA APREZA drove the stolen 2016 Mercedes C300 to a Burger King and used Victim E's credit card to purchase food from the Burger King;

(v) On or about September 16, 2020, in Chicago, Illinois, defendants MAVERICK CELA and PREZILA APREZA, drove the stolen 2016 Mercedes C300 to a McDonald's and used Victim E's credit card to purchase food from the McDonald's;

(w) On or about September 16, 2020, in Chicago, Illinois, defendant PREZILA APREZA used Victim E's credit card at a Snappy's convenience store;

(x) On or before September 21, 2020, defendants MAVERICK CELA, EDSON RESENDEZ, PREZILA APREZA, and Individual A obtained three firearms;

(y) On or about September 21, 2020, defendants MAVERICK CELA, EDSON RESENDEZ, PREZILA APREZA, and Individual A drove the stolen 2015 Hyundai Elantra to Skokie, to obtain another vehicle;

(z) On or about September 21, 2020, in Skokie, Illinois, defendants MAVERICK CELA, EDSON RESENDEZ, PREZILA APREZA, and

Individual A drove the stolen 2015 Hyundai Elantra up to Victim F's 2005 Nissan Altima;

- (aa) On or about September 21, 2020, in Skokie, Illinois, defendants discharged three firearms at Victim F;
- (bb) On or about September 21, 2020, defendants MAVERICK CELA, EDSON RESENDEZ, PREZILA APREZA, and Individual A drove the stolen 2015 Hyundai Elantra to Chicago, to obtain another vehicle;
- (cc) On or about September 21, 2020, in Chicago, Illinois, defendants MAVERICK CELA, EDSON RESENDEZ, PREZILA APREZA, and Individual A attempted to steal Victim Nabil Mahouar's 2014 Volkswagen CC from the person and presence of Nabil Mahouar by force, violence and intimidation;
- (dd) On or about September 21, 2020, in Chicago, Illinois, defendants discharged two firearms at Nabil Mahouar, resulting in the death of Nabil Mahouar;
- (ee) On or about September 21, 2020, in Chicago, Illinois, defendants MAVERICK CELA, EDSON RESENDEZ, PREZILA APREZA and Individual A drove the stolen Hyundai Elantra next to a 2018 Toyota containing Victim G and Eduardo Triano;

- (ff) On or about September 21, 2020, in Chicago, Illinois, a defendant discharged a firearm at Victim G and Eduardo Triano, resulting in the death of Eduardo Triano;
- (gg) On or about September 21, 2020, defendants MAVERICK CELA, EDSON RESENDEZ, and PREZILA APREZA drove the stolen 2015 Hyundai Elantra to Berwyn, to obtain another vehicle;
- (hh) On or about September 21, 2020, in Berwyn, Illinois, a defendant brandished a firearm at Victim H;
- (ii) On or about September 21, 2020, in Skokie, Illinois, defendants MAVERICK CELA, EDSON RESENDEZ, and PREZILA APREZA took Victim H's 2020 Chevrolet Equinox, from the person and presence of Victim H by force, violence, and intimidation;
- (jj) On or about September 21, 2020, in Chicago, Illinois, defendants EDSON RESENDEZ, MAVERICK CELA, and PREZILA APREZA, abandoned the stolen 2015 Hyundai Elantra on the 3800 block of North Parkview Terrace, in Chicago, Illinois; and
- (kk) On or about September 21, 2020, in Chicago, Illinois, defendants EDSON RESENDEZ, MAVERICK CELA, and PREZILA APREZA, abandoned the stolen 2020 Chevrolet Equinox at approximately the

intersection of West Altgeld Street and North Keeler Avenue, in Chicago,
Illinois;

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

COUNT TWO

The SPECIAL JANUARY 2023 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 JANUARY 2023 GRAND JURY further charges:

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

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

defendants herein, did use, carry and brandish a firearm, during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, namely, carjacking, in violation of Title 18, United States Code, Section 2119 and 2, 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 JANUARY 2023 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 B, by force, violence and intimidation;

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

COUNT FIVE

The SPECIAL JANUARY 2023 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, did use, carry and brandish a firearm, during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, namely, carjacking, in violation of Title 18, United States Code, Section 2119 and 2, 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 JANUARY 2023 GRAND JURY further charges:

On or about September 16, 2020, at Skokie, in the Northern District of Illinois,
Eastern Division,

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

defendants herein, with intent to cause death and serious bodily harm, took a motor vehicle, namely a 2016 Mercedes C300, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of Victim E, by force, violence and intimidation;

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

COUNT SEVEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about September 16, 2020, at Skokie, in the Northern District of Illinois,
Eastern Division,

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

defendants herein, did use, carry, and brandish a firearm, during and in relation to
a crime of violence for which each may be prosecuted in a court of the United States,
namely, carjacking, in violation of Title 18, United States Code, Section 2119 and 2,
as charged in Count Six of this Indictment;

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

COUNT EIGHT

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about September 21, 2020, at Chicago, in the Northern District of Illinois, Eastern Division,

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

defendants herein, with intent to cause death and serious bodily harm, attempted to take a motor vehicle, namely, a 2014 Volkswagen CC, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of Nabil Mahouar, by force, violence and intimidation, resulting in the death of Nabil Mahouar;

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

COUNT NINE

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about September 21, 2020, at Berwyn, in the Northern District of Illinois,
Eastern Division,

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

defendants herein, with intent to cause death and serious bodily harm, took a motor vehicle, namely a 2020 Chevrolet Equinox, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of Victim H, by force, violence and intimidation;

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

COUNT TEN

The SPECIAL JANUARY 2023 GRAND JURY further charges:

On or about September 21, 2020, at Berwyn, in the Northern District of Illinois,
Eastern Division,

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

defendants herein, did knowingly use, carry, and brandish a firearm, during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, namely, carjacking, in violation of Title 18, United States Code, Sections 2119 and 2, as charged in Count Nine of this Indictment;

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

NOTICE OF SPECIAL FINDINGS

1. The allegations set forth in Count Eight are incorporated here.
2. The defendants MAVERICK CELA and EDSON RESENDEZ:
 - a. Were eighteen years of age or older at the time of the offense (Title 18, United States Code, Section 3591(a)(2));
 - b. Intentionally inflicted serious bodily injury that resulted in the death of the victim (Title 18, United States Code, Section 3591(a)(2)(B));
 - c. Intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
 - d. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D)); and
 - e. Intentionally killed and attempted to kill more than one person in a single criminal episode (Title 18, United States Code, Section 3592(c)(16)).
3. The defendant PREZILA APREZA:
 - a. Was eighteen years of age or older at the time of the offense (Title 18, United States Code, Section 3591(a)(2)); and

b. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D)).

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY