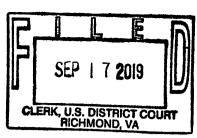
IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division



UNITED STATES OF AMERICA) No. 3:19CR <u>130</u>
)
v.) Count 1: 18 U.S.C. §§ 2113(a), (d), and (e)
) Forced Accompaniment During Armed
OKELLO T. CHATRIE,) Credit Union Robbery
)
Defendant.) Count 2: 18 U.S.C. § 924(c)(1)(A)
) Use, Carry, and Brandish a Firearm During
) and in Relation to a Crime of Violence
)
) Forfeiture Allegation

September 2019 Term – at Richmond, Virginia

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Forced Accompaniment during an Armed Credit Union Robbery)

On or about May 20, 2019, in the Eastern District of Virginia, the defendant, OKELLO T. CHATRIE, by force and violence, and intimidation, did take from the person and presence of another, namely J.W. and K.C., employees of the Call Federal Credit Union located at 3640 Call Federal Drive, Midlothian, Virginia, 23112, approximately \$195,000 in United States currency, belonging to, and in the care, custody, control, management and possession of the Call Federal Credit Union, the accounts of which were then insured by the National Credit Union Administration Board; and in committing such offense, the defendant did knowingly and unlawfully assault and put in jeopardy the life of other persons, namely Call Federal Credit Union employees and customers, by the use of a dangerous weapon, namely a firearm; and further, the

defendant, in committing this offense, did knowingly and unlawfully force another person to accompany him without the consent of such person.

(In violation of Title 18, United States Code, Sections 2113(a), 2113(d), and 2113(e)).

COUNT TWO

(Use, Carry, and Brandish a Firearm During and in Relation to a Crime of Violence)

On or about May 20, 2019, in the Eastern District of Virginia, the defendant, OKELLO T. CHATRIE, did knowingly and unlawfully 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, that is, forced accompaniment during an armed credit union robbery, as charged in Count One of this Indictment, which is re-alleged as if fully set forth here.

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

FORFEITURE ALLEGATION

Pursuant to Federal Rule of Criminal Procedure 32.2, the defendant, OKELLO T. CHATRIE, is notified that if convicted of Count One of this Indictment, the defendant shall forfeit to the United States, any property, real or personal, which constitutes or is derived from proceeds traceable to such violation.

This property includes, but is not limited to:

A sum of money of at least \$195,000, which represents the total proceeds of the offense charged, to be partially offset by \$102,293 seized from 1317 Willis Street, Richmond, Virginia, 23224 on August 13, 2019.

If the property subject to forfeiture cannot be located, the United States will seek an order forfeiting substitute assets.

The defendant is further notified that upon conviction of the offenses alleged in Count One or Count Two of this Indictment, the defendant shall forfeit any firearms and ammunition involved in or used in any knowing violation of such offenses.

Property subject to forfeiture includes, but is not limited to:

A 9 mm Taurus G2C pistol, serial number TLW87541; and

all accompanying ammunition.

(In accordance with Title 18, United States Code, Sections 924(d) and 981(a)(1)(C) as incorporated

by Title 28, United States Code, Section 2461(c)).

A TRUE BILL:

FOREPERSON

G. ZACHARY TERWILLIGER United States Attorney

Pursuant to the E-Government Act, the original of this page has been filed under seal in the Clerk's Office

By:

Kenneth R. Simon, Jr.

Peter S. Duffey

Assistant United States Attorneys