

2021R856/TA

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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MAR - 9 2023

UNITED STATES OF AMERICA

Hon. Michael A. Shipp

AT ~~8:00~~ 1:00 P.M.

CLERK, U.S. DISTRICT COURT - DNJ

v.

Crim. No. 23- 180

JABREE JOHNSON

18 U.S.C. §§ 111(a)(1) and (b);

18 U.S.C. § 2114(a);

18 U.S.C. § 924(c)(1)(A)(iii)

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at
Trenton, charges as follows:

COUNT ONE

(Assault of an Officer of the United States with a Deadly Weapon)

On or about March 22, 2021, in Mercer County, in the District of New
Jersey, and elsewhere, the defendant,

JABREE JOHNSON,

by use of a deadly and dangerous weapon, namely, a firearm, intentionally and
forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with an
officer of the United States, as designated in Title 18, United States Code, Section
1114, namely, a Special Agent of the Bureau of Alcohol, Tobacco, Firearms and
Explosives, while the Special Agent was engaged in official duties.

In violation of Title 18, United States Code, Sections 111(a)(1) and (b).

COUNT TWO

(Robbery of Money of the United States with a Dangerous Weapon)

On or about March 22, 2021, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

JABREE JOHNSON,

with intent to rob, steal, and purloin money of the United States, namely, United States currency, in the lawful charge, control, and custody of a Special Agent of the Bureau of Alcohol, Tobacco, Firearms and Explosives, did assault the Special Agent, and in doing so put the life of the Special Agent in jeopardy by the use of a dangerous weapon, namely, a loaded firearm.

In violation of Title 18, United States Code, Section 2114(a).

COUNT THREE

(Using and Carrying a Firearm During and in Relation to a Crime of Violence)

On or about March 22, 2021, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

JABREE JOHNSON,

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the robbery of money of the United States, as charged in Count Two of this Indictment, did knowingly use and carry a firearm, which was discharged, and in furtherance of such crime, did knowingly possess such firearm.

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

FORFEITURE ALLEGATION AS TO COUNT TWO

1. As the result of committing the robbery offence in violation of 18 U.S.C. § 2114(a), as charged in Count Two of this Indictment, defendant Jabree Johnson shall forfeit to the United States, (i) pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of such offense, and (ii) pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearm and ammunition involved in or used in the commission of such offense.

Substitute Assets Provision

2. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

FORFEITURE ALLEGATION AS TO COUNT THREE

1. As a result of committing the offense of use of a firearm during a crime of violence in violation of 18 U.S.C. § 924(c)(1)(A)(iii) set forth in Count Three of the Indictment, defendant Jabree Johnson shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of such offense, including, but not limited to, one Glock 21 .45 caliber pistol, bearing serial number BADV246.

A TRUE BILL



FOREPERSON

Philip R. Sellinger h2 Ac

PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: 23-120

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

JABREE JOHNSON

INDICTMENT FOR

18 U.S.C. §§ 111(a)(1) and (b)

18 U.S.C. § 2114(a)

18 U.S.C. § 924(c)(1)(A)(iii)

A True Bill,


Foreperson

PHILIP R. SELLINGER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY

TRACEY AGNEW
ASSISTANT U.S. ATTORNEY
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