
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : CRIMINAL COMPLAINT
 :
 v. : HON. ZAHID N. QURAISHI
 :
 JABREE JOHNSON : Mag. No. 21-14000 (ZNQ)

I, Michael Lovett, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

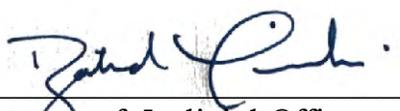
continued on the attached pages and made a part hereof.

s/ Michael Lovett

Michael Lovett, Special Agent
Federal Bureau of Investigation

Attested to me by telephone pursuant
to F.R.C.P. 4.1 on April 2, 2021

HONORABLE ZAHID N. QURAISHI
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

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, 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

(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, assault on an officer of the United States, as charged in Count One of this Criminal Complaint, 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).

COUNT THREE

(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).

ATTACHMENT B

I, Michael Lovett, am a Special Agent with the Federal Bureau of Investigation (“FBI”), and have been since 2017. I have been personally involved in the investigation of this matter. The information contained in this Criminal Complaint is based on my personal knowledge, my conversations with other law enforcement officers, and on information obtained from other sources. Because this Criminal Complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts which I believe are necessary to establish probable cause. Where the content of documents and the actions, statements, and conversations of individuals are recounted herein, they are recounted in substance and in part. All dates and times are approximate.

1. On March 22, 2021, a federal law enforcement agent working in an undercover capacity (the “UC-Victim”) attempted to execute a controlled purchase of multiple firearms from an individual later identified as defendant JABREE JOHNSON (“JOHNSON”). At approximately 8:41 p.m., the UC-Victim and his/her partner, a federal law enforcement agent also working in an undercover capacity (“UC2”), drove an undercover vehicle (“UC Vehicle”) to the parking lot of a convenience store located in or around Hamilton, New Jersey, for the purpose of executing a controlled purchase of three handguns. The UC Vehicle was equipped with audio- and video-recording devices.

2. Before the planned controlled purchase, UC-Victim had been in contact with another individual whom UC-Victim knew from prior interactions (“Individual 1”). Individual 1 sent a text message to UC-Victim approximately three hours before the anticipated firearms sale, stating: “I’m gonna get u guys in touch trust me everything should go smooth I was just saying as an example why I don’t want too much it’s not my money and it’s 4 pieces so I’m pretty sure u wanna do the transaction yaself for ur money If that was u.” By this text message, Individual 1 offered to broker the planned firearms sale, specifically by introducing the putative seller, JOHNSON, to UC-Victim. Individual 1 further confirmed to UC-Victim that the sale would involve four firearms.¹

3. Approximately 30 minutes before the planned firearms transaction, Individual 1 sent a text message to UC-Victim, stating: “But he said he’s about to call you,” explaining that JOHNSON was going to contact UC-Victim regarding details of the planned transaction. Individual 1 further informed UC-

¹ However, shortly before the sale was scheduled to occur, JOHNSON clarified in a phone call to UC-Victim that he (JOHNSON) was prepared to sell only three firearms to UC-Victim.

Victim that he (Individual 1) would not accompany JOHNSON to the sale because he was “with his girl.”

4. Thereafter, JOHNSON communicated via telephone with UC-Victim, and agreed upon a location to conduct the firearms transaction. Thereafter, UC-Victim and UC2 arrived in the UC Vehicle at the agreed-upon location – a commercial establishment parking lot located in or around Hamilton, New Jersey. At approximately 9:00 p.m., UC-Victim and UC2 observed JOHNSON approach the UC Vehicle wearing a black face mask, black jacket, bleach-washed jeans and brown boots, and carrying a black bag. While JOHNSON wore a mask, much of his face, including that portion from his nose to his forehead, was unobscured. As JOHNSON approached the UC Vehicle, he paused upon discovering the presence of UC2 in the vehicle’s front passenger seat. JOHNSON called UC-Victim and complained to UC-Victim about UC2’s presence. UC-Victim told JOHNSON that UC-Victim would join JOHNSON outside of the vehicle to discuss the matter.

5. While UC2 remained inside the UC Vehicle, UC-Victim and JOHNSON had a brief conversation outside of the UC Vehicle. Among other things, UC-Victim told JOHNSON: “Ain’t no problem” and “I got the money.” After the brief conversation between UC-Victim and JOHNSON, JOHNSON departed the parking lot where the UC Vehicle was located and walked to a vehicle parked nearby. JOHNSON entered that vehicle, which departed the area.

6. Shortly thereafter, JOHNSON called UC-Victim and told UC-Victim that he (JOHNSON) would be comfortable proceeding with the planned firearms transaction. JOHNSON stated: “One of y’all got to get out so I can get in,” meaning that JOHNSON would not proceed with the sale while both UC-Victim and UC2 remained in the UC Vehicle. UC-Victim agreed to JOHNSON’s demand.

7. Shortly thereafter, UC-Victim and UC2 observed JOHNSON approach the UC Vehicle from the vehicle’s passenger side. When JOHNSON arrived, UC2 exited the UC Vehicle and JOHNSON then entered the front passenger seat.

8. Shortly after JOHNSON entered the UC Vehicle, UC-Victim asked JOHNSON how many firearms JOHNSON was prepared to sell. JOHNSON replied: “There is one of em right here I got another in the bag,” a reference to the black bag JOHNSON still possessed. UC-Victim turned on the overhead light, illuminating the interior of the UC Vehicle’s passenger compartment. JOHNSON reached into the black bag, produced a black, semi-automatic handgun, and handed the firearm to UC-Victim. UC-Victim inspected the firearm, including by removing its magazine, which UC-Victim observed was loaded with ammunition.

9. After inspecting the firearm, UC-Victim returned it to JOHNSON before requesting to see the other firearms that JOHNSON had agreed to sell. UC-Victim asked JOHNSON for the total purchase price for the three firearms. JOHNSON replied: "Twenty-Five for all three," meaning \$2,500 for three handguns. Immediately thereafter, JOHNSON racked the slide of the firearm (loading a round into the chamber) and pointed the firearm directly at UC-Victim. JOHNSON then demanded of UC-Victim: "Give it up, give me the money, give me the money." UC-Victim complied, reached into his/her pocket, and produced a quantity of U.S. currency, which UC-Victim tossed at JOHNSON. Continuing to point the firearm at UC-Victim, JOHNSON ordered UC-Victim to exit the UC Vehicle.

10. Complying with JOHNSON's demand, UC-Victim exited the UC Vehicle, immediately drew his/her service-issued firearm, and fired it at JOHNSON through the UC-Vehicle's back passenger window, striking JOHNSON in the right shoulder. JOHNSON also fired his firearm multiple times at UC-Victim and then fled the area.

11. Shortly thereafter, officers of the Trenton Police Department ("TPD"), who had been following a Chevrolet Equinox traveling at a high rate of speed ("Vehicle 2"), observed Vehicle 2 arrive at a nearby hospital located in or around Trenton, New Jersey (the "Hospital"). After Vehicle 2 parked at the Hospital, TPD officers observed an unidentified female walking an individual, later identified as JOHNSON, from Vehicle 2 to the Hospital's emergency room. The officers, who were equipped with body-worn video-recording devices, observed that JOHNSON was wearing bleach-washed jeans and brown boots as he entered the emergency room.

12. Upon JOHNSON's arrival at the Hospital's emergency room, hospital personnel collected his personal belongings and stored them in a container. In addition to the clothing JOHNSON had been wearing at the time of his arrival, hospital personnel also collected JOHNSON's cell phone and a large quantity of U.S. currency. (JOHNSON's cell phone and other belongings remained in the hospital room.) During the investigation, law enforcement compared the serial numbers on the U.S. currency JOHNSON had carried into the Hospital with a record of the serial numbers on the U.S. currency that UC-Victim possessed before the meeting with JOHNSON in the UC Vehicle. That comparison yielded a match between the serial numbers on the currency in JOHNSON's possession at the Hospital and the currency that UC-Victim possessed at the time of the assault and robbery.

13. While JOHNSON was at the Hospital, a law enforcement officer placed a call to the telephone number that JOHNSON had used during his telephone conversations with UC-Victim, as described in paragraphs 4 and 6, above. Another law enforcement officer stationed outside of JOHNSON's

hospital room confirmed that JOHNSON's cell phone rang in response to the call.

14. During the investigation, pursuant to a court-authorized search of Vehicle 2, law enforcement discovered in the vehicle, among other items, a strap to a handbag and a blood-stained black face mask matching the appearance of the mask that JOHNSON had been wearing inside the UC Vehicle. Additionally, pursuant to a lawful search of the UC Vehicle, law enforcement discovered on the front passenger compartment the black bag that JOHNSON had carried into the UC Vehicle moments before the armed robbery and assault. That bag matched the strap recovered from Vehicle 2.