

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
MARVIN JOHNSON,	:	VIOLATIONS:
a/k/a "Purvis"	:	18 U.S.C. § 371
	:	(conspiracy to commit bank robbery
	:	- 1 count)
	:	18 U.S.C. §2113(a) (bank robbery
	:	- 1 count)
	:	18 U.S.C. §2113(d) (armed bank robbery
	:	- 1 count)
	:	18 U.S.C. § 924(c) (possession of a
	:	firearm in furtherance of a crime of
	:	violence - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about November 9, 2009, until on or about November 10, 2009, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

MARVIN JOHNSON,
a/k/a "Purvis,"

conspired and agreed, together with others known and unknown to the grand jury, to commit an offense against the United States, that is, to take by force and violence, and by intimidation, from employees of banks, the deposits of which were insured by the Federal Deposit Insurance Corporation, lawful currency of the United States, in violation of Title 18, United States Code, Section 2113(a) and 2113(d).

MANNER AND MEANS

It was a part of the conspiracy that:

2. Defendant MARVIN JOHNSON agreed with Jermaine Parks, charged elsewhere, to assist Parks in robbing banks.

3. Defendant MARVIN JOHNSON also recruited his son, Raymond Fauntroy, charged elsewhere, to assist Jermaine Parks in one of the bank robberies.

4. Defendant MARVIN JOHNSON obtained a firearm for Jermaine Parks to use in the commission of one of the robberies.

5. Defendant MARVIN JOHNSON obtained a car to use to drive Jermaine Parks to commit the bank robberies.

6. Defendant MARVIN JOHNSON shared in the proceeds of one of the robberies with Jermaine Parks and was to share in the proceeds with Parks and Raymond Fauntroy in a second robbery.

7. Defendant MARVIN JOHNSON and Jermaine Parks to used cellular telephones to communicate with each other before, during, and after the bank robberies.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendant MARVIN JOHNSON and Jermaine Parks and Raymond Fauntroy, charged elsewhere, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

The November 9, 2009 Citizens Bank Robbery

On or about November 9, 2009:

1. Defendant MARVIN JOHNSON obtained an automobile to use in the commission of a bank robbery of the Citizens Bank, located at 7248 Rising Sun Avenue, in Philadelphia, Pennsylvania (the Citizens Bank).
2. Defendant MARVIN JOHNSON drove Jermaine Parks in the automobile to the Citizens Bank.
3. Upon arriving at the Citizens Bank, Jermaine Parks entered the bank, and passed a demand note to a bank teller which threatened to shoot if the teller did not turn over cash.
4. After receiving the demand note, the teller handed over approximately \$2,452 in cash to Jermaine Parks, who fled from the bank.
5. After Jermaine Parks fled from the bank, defendant MARVIN JOHNSON drove Parks away from the Citizens Bank and subsequently split the cash proceeds from the bank robbery.

The November 10, 2009 PNC Bank Robbery

On or about November 10, 2009:

6. In preparation for the commission of a bank robbery of the PNC Bank, located at 8340 Germantown Pike, in Philadelphia, Pennsylvania (PNC Bank), defendant MARVIN JOHNSON:

a. obtained an automobile to drive to and from the PNC Bank;
and

b. provided Jermaine Parks with a Smith & Wesson .40 caliber handgun, serial number PAY0582, and .40 caliber ammunition.

7. Defendant MARVIN JOHNSON drove Jermaine Parks and Raymond Fauntroy to the PNC Bank, where Parks, who possessed a .40 caliber Smith & Wesson semi-automatic handgun, serial number PAY0582, and Fauntroy entered the PNC Bank.

8. Once inside the bank, Jermaine Parks passed a demand note to a bank teller, which stated:

NO Dye Packs or Transmitters Put 100's, 50's, 20's, 10's +5's Into An envelope and give it to me calmly + quickly. If NOT I'LL Shoot whoever I Can!!!

The teller then placed cash into a plastic bag thrown at the teller by Jermaine Parks. Raymond Fauntroy then threw a plastic bag at a second teller, who placed cash into that bag as well. In total, parks and Fauntroy stole approximately \$3,923 from the bank, while defendant JOHNSON remained outside as the getaway driver.

9. After Jermaine Parks and Raymond Fauntroy fled the bank with the stolen cash, they got into defendant MARVIN JOHNSON's automobile and immediately drove away.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 7 and Overt Acts 1 through 5 of Count One of this indictment are incorporated here.

2. On or about November 9, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MARVIN JOHNSON,
a/k/a "Purvis,"**

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking from, employees of the Citizens Bank, located at 7248 Rising Sun Avenue in Philadelphia, lawful currency of the United States, that is, approximately \$2,452 belonging to, and in the care, custody, control, management, and possession of the Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 7 and Overt Acts 6 through 9 of Count One of this indictment are incorporated here.

2. On or about November 10, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MARVIN JOHNSON,
a/k/a "Purvis,"**

knowingly and unlawfully by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of the PNC Bank, located at 8340 Germantown Pike in Philadelphia, lawful currency of the United States, that is, approximately \$3,923 belonging to, and in the care, custody, control, management and possession of the PNC Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and put in jeopardy the lives of the PNC Bank employees, and other persons, by use of a dangerous weapon, that is, a .40 caliber, Smith & Wesson, semi-automatic handgun, serial number PAY0582.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 10, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MARVIN JOHNSON,
a/k/a “Purvis,”**

knowingly possessed a firearm, and aided and abetted the possession of a firearm, that is, a .40 caliber, Smith & Wesson, semi-automatic handgun, serial number PAY0582, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is, armed bank robbery, in violation of Title 18, United States Code, Section 2113(d).

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 2113(a), set forth in this indictment, defendant

**MARVIN JOHNSON,
a/k/a "Purvis,"**

shall forfeit to the United States of America the firearm and ammunition involved in the commission of such offense, including, but not limited to:

1. .40 caliber, Smith & Wesson, semiautomatic handgun, serial number PAY0582;
- and
2. 1 Triton and 9 Remington .40 caliber cartridges.

All pursuant to Title 18, United States Code, Section 924 and Title 28, United States Code, Section 2461.

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney