

F. 1. 20
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

2020 SEP 18 P 5:51

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CAROL L. MICHEL
CLERK

FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

**INDICTMENT FOR VIOLATIONS OF THE HOBBS
ACT AND THE FEDERAL GUN CONTROL ACT**

UNITED STATES OF AMERICA

* CRIMINAL NO. **20-00089**

v.

* SECTION: **SECT. A MAG. 5**

JARRELL FOX

* VIOLATIONS: 18 U.S.C. § 1951(a)
18 U.S.C. § 924(c)(1)(A)(i)
18 U.S.C. § 924(c)(1)(A)(ii)

* * *

The Grand Jury charges that:

COUNT 1
(Hobbs Act Robbery)

1. At all times herein, Family Dollar, store #8299, located at 11901 North I-10 Service Road, New Orleans, Louisiana, 70128, was a store that sold products directly to customers. Family Dollar, conducted its business in and affecting interstate commerce in that many of the products sold to its customers were obtained from producers and manufacturers outside the State of Louisiana, as well as suppliers inside the State of Louisiana, that obtained the products outside the State of Louisiana.

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___ CtRmDep _____
___ Doc. No. _____

2. On or about September 25, 2019, in the Eastern District of Louisiana, the defendant **JARRELL FOX**, did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant, **JARRELL FOX**, did unlawfully take and obtain property consisting of approximately two hundred seventy dollars (\$270.00) of United States currency, in the care, custody, control, management, and possession of a Family Dollar employee, against her will, by means of actual and threatened force, violence, and fear of injury, that is, the defendant, **JARRELL FOX**, did brandish a firearm; all in violation of Title 18, United States Code, Section 1951(a).

COUNT 2
(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about September 25, 2019, in the Eastern District of Louisiana, the defendant, **JARRELL FOX**, did knowingly 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, Hobbs Act Robbery, as charged in Count 1 of this Indictment; in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 3
(Hobbs Act Robbery)

1. At all times herein, Subway, located at 3502 South Carrollton Avenue, New Orleans, Louisiana, 70118, was a store that sold products directly to customers. Subway, conducted its business in and affecting interstate commerce in that many of the products sold to its customers were obtained from producers and manufacturers outside the State of Louisiana, as

well as suppliers inside the State of Louisiana, that obtained the products outside the State of Louisiana.

2. On or about October 10, 2019, in the Eastern District of Louisiana, the defendant **JARRELL FOX**, did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant, **JARRELL FOX**, did unlawfully take and obtain property consisting of United States currency, in the care, custody, control, management, and possession of a Subway employee, against her will, by means of actual and threatened force, violence, and fear of injury, that is, the defendant, **JARRELL FOX**, did brandish a firearm; all in violation of Title 18, United States Code, Section 1951(a).

COUNT 4

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

On or about October 10, 2019, in the Eastern District of Louisiana, the defendant, **JARRELL FOX**, did knowingly 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, Hobbs Act Robbery, as charged in Count 3 of this Indictment; in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 5

(Hobbs Act Robbery)

1. At all times herein, Family Dollar, store #5398, located at 3612 South Carrollton Avenue, New Orleans, Louisiana, 70118, was a store that sold products directly to customers. Family Dollar, conducted its business in and affecting interstate commerce in that many of the products sold to its customers were obtained from producers and manufacturers outside the State

of Louisiana, as well as suppliers inside the State of Louisiana, that obtained the products outside the State of Louisiana.

2. On or about October 23, 2019, in the Eastern District of Louisiana, the defendant **JARRELL FOX**, did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant, **JARRELL FOX**, did unlawfully take and obtain property consisting of approximately three hundred fifteen dollars and twenty-four cents (\$315.24) of United States currency, in the care, custody, control, management, and possession of a Family Dollar employee, against her will, by means of actual and threatened force, violence, and fear of injury, that is, the defendant, **JARRELL FOX**, did brandish a firearm; all in violation of Title 18, United States Code, Section 1951(a).

COUNT 6
(Possession of a Firearm During of a Crime of Violence)

On or about the April 24, 2019, in the Eastern District of Louisiana, the defendant, **JARRELL FOX**, did knowingly possess 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, Hobbs Act Robbery as charged in Count 5 of this Indictment; in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

NOTICE FORFEITURE

1. The allegations of Counts 1 through 6 are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offenses alleged in Counts 1, 3, and 5, defendant, **JARRELL FOX**, shall forfeit to the United States pursuant to Title 18, United States Code, Section

981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property real or personal which constitutes or is derived from proceeds traceable to said offenses.

3. As a result of the offenses alleged in Counts 2, 4, and 6, defendant, **JARRELL FOX**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in the commission of said offenses.

4. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- 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;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendants up to the value of said property.

A TRUE BILL:



PETER G. STRASSER
UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read 'Brittany L. Reed', written over a horizontal line.

Brittany L. Reed
Assistant United States Attorney
Louisiana Bar Roll No. 31299

New Orleans, Louisiana
September 18, 2020