

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

FILED  
5.20.20  
CLERK, U. S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE, FLORIDA

UNITED STATES OF AMERICA

v.

MAWDO MALICK SALLAH and  
KIRK DOUGLAS JOHNSON

CASE NO. 8:20-cr-161-T-23JSS  
18 U.S.C. § 844(h), (i), and (n)  
18 U.S.C. § 2113(b)

INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning on an unknown date but no later than on or about November 4, 2019, and continuing through March 22, 2020, in the Middle District of Florida, and elsewhere, the defendants,

MAWDO MALICK SALLAH and  
KIRK DOUGLAS JOHNSON,

did knowingly and willfully combine, conspire, and agree with each other to maliciously damage and destroy, and attempt to damage and destroy, by means of fire and explosive, real and personal property used in interstate and foreign commerce and in activities affecting interstate and foreign commerce, that is, Bank ATM 1, Bank ATM 2, Bank ATM 3, and Bank ATM 4.

All in violation of 18 U.S.C. § 844(n).

**COUNT TWO**

On or about November 4, 2019, in the Middle District of Florida, the defendants,

MAWDO MALICK SALLAH and  
KIRK DOUGLAS JOHNSON,

aiding and abetting each other, knowingly used fire and an explosive, to commit bank larceny, in violation of 18 U.S.C. § 2113(b), a felony prosecutable in a court of the United States.

All in violation 18 U.S.C. §§ 844(h) and 2.

**COUNT THREE**

On or about November 4, 2019, in the Middle District of Florida, the defendants,

MAWDO MALICK SALLAH and  
KIRK DOUGLAS JOHNSON,

aiding and abetting each other, did maliciously damage and destroy, and attempt to damage and destroy, by means of fire and explosive, real and personal property used in interstate and foreign commerce and in activities affecting interstate and foreign commerce, that is, Bank ATM 1.

All in violation of 18 U.S.C. §§ 844(i) and 2.

COUNT FOUR

On or about November 4, 2019, in the Middle District of Florida, the defendants,

MAWDO MALICK SALLAH and  
KIRK DOUGLAS JOHNSON

aiding and abetting each other, did knowingly take and carry away with intent to steal and purloin more than \$1000 of money belonging to and in the care, custody, control, management and possession of Bank 1, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

All in violation of 18 U.S.C. §§ 2113(b) and 2.

COUNT FIVE

On or about December 22, 2019, in the Middle District of Florida, the defendants,

MAWDO MALICK SALLAH and  
KIRK DOUGLAS JOHNSON,

aiding and abetting each other, did maliciously damage and destroy, and attempt to damage and destroy, by means of fire and explosive, real and personal property used in interstate and foreign commerce and in activities affecting interstate and foreign commerce, that is, Bank ATM 2.

All in violation of 18 U.S.C. §§ 844(i) and 2.

**COUNT SIX**

On or about January 12, 2020, in the Middle District of Florida, the defendants,

MAWDO MALICK SALLAH and  
KIRK DOUGLAS JOHNSON,

aiding and abetting each other, knowingly used fire and an explosive, to commit bank larceny, in violation of 18 U.S.C. § 2113(b), a felony prosecutable in a court of the United States.

All in violation 18 U.S.C. §§ 844(h) and 2.

**COUNT SEVEN**

On or about January 12, 2020, in the Middle District of Florida, the defendants,

MAWDO MALICK SALLAH and  
KIRK DOUGLAS JOHNSON,

aiding and abetting each other, did maliciously damage and destroy, and attempt to damage and destroy, by means of fire and explosive, real and personal property used in interstate and foreign commerce and in activities affecting interstate and foreign commerce, that is, Bank ATM 3.

In violation of 18 U.S.C. §§ 844(i) and 2.

**COUNT EIGHT**

On or about January 12, 2020, the Middle District of Florida, the defendants,

MAWDO MALICK SALLAH and  
KIRK DOUGLAS JOHNSON

aiding and abetting each other, did knowingly take and carry away with intent to steal and purloin more than \$1000 of money belonging to and in the care, custody, control, management and possession of Bank 3, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

All in violation of 18 U.S.C. §§ 2113(b) and 2.

**FORFEITURE**

1. The allegations contained in Counts One through Eight of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 982(a)(2)(B) and 844(c), and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 18 U.S.C. § 844, the defendants shall forfeit to the United States of America, pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation, pursuant to 18 U.S.C. § 981(a)(1)(C) any property which constitutes or is derived from proceeds traceable to the violation, and pursuant to 18 U.S.C. § 844(c) and 28 U.S.C. § 2461(c), any explosive materials involved or used or intended to be used in


the violation.

3. If any of the property described above, 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 party;
- 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 divided without difficulty,


the United States of America shall be entitled to forfeiture of substitute property under 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).


A TRUE BILL,

  
\_\_\_\_\_  
Foreperson

MARIA CHAPA LOPEZ  
United States Attorney

By:   
for Gregory T. Nolan  
Assistant United States Attorney

By:   
Frank Talbot  
Assistant United States Attorney

By:   
for Christopher F. Murray  
Assistant United States Attorney  
Chief, Violent Crime and Narcotics

No.

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**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Tampa Division

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THE UNITED STATES OF AMERICA

vs.

MAWDO MALICK SALLAH and  
KIRK DOUGLAS JOHNSON

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**INDICTMENT**

Violations: Title 18, United States Code, Sections 844(h), (i), and (n)  
Title 18, United States Code, Section 2113(b)

A true bill,

  
\_\_\_\_\_  
Foreperson

Filed in open court this 20th day  
of May, 2020.

  
\_\_\_\_\_  
Clerk

Bail \$ \_\_\_\_\_