

FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

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CLERK, US DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 8:22 CR 153 KKM-AAS

18 U.S.C. § 1951  
18 U.S.C. § 924(c)  
18 U.S.C. § 401(3)

REGINALD REYNALD ROBERTS

a/k/a "Rudy"

NATHANIEL KEITH CARR

a/k/a "Nate"

CHRISHAWN DE'EARL BUTLER

a/k/a "Baby"

DANIEL JACKSON

a/k/a "D-Jack"

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

Beginning on an unknown date, but no later than in or about December 27, 2020, and continuing through on or about April 11, 2021, in the Middle District of Florida, and elsewhere, the defendants,

REGINALD REYNALD ROBERTS

a/k/a "Rudy",

NATHANIEL KEITH CARR

a/k/a "Nate",

CHRISHAWN DE'EARL BUTLER

a/k/a "Baby", and

DANIEL JACKSON

a/k/a "D-Jack"

did conspire, confederate, and agree with others, both known and unknown to the Grand Jury, to knowingly, in any way or degree, obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C. § 1951(b)(3), and the movement of

any article and commodity in commerce, by robbery, as that term is defined in 18 U.S.C. § 1951(b)(1), that is, by knowingly and unlawfully taking and obtaining personal property from the person and in the presence of another, against his or her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his or her person and property.

In violation of 18 U.S.C. § 1951(a).

**COUNT TWO**  
**(Interference with Commerce by Robbery)**

On or about January 2, 2021, in the Middle District of Florida and elsewhere, the defendants,

REGINALD REYNALD ROBERTS  
a/k/a “Rudy” and  
NATHANIEL KEITH CARR  
a/k/a “Nate”

did knowingly in any way and degree, obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C. § 1951(b)(3), and the movement of any article and commodity in such commerce, by robbery, as that term is defined in 18 U.S.C. § 1951(b)(1), that is, by knowingly and unlawfully taking and obtaining personal property of K.S. and R.S., located at a residence on Lynbrook Drive in Zephyrhills, Florida, consisting of United States currency, and narcotics from the person and in the presence of another, against his or her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his or her person and property. (and attempted to do so).

In violation of 18 U.S.C. § 1951(a) and (b), and 18 U.S.C. § 2.

**COUNT THREE**  
**(Using, Carrying, and Brandishing a Firearm During  
and in Relation to a Crime of Violence)**

On or about January 2, 2021, in the Middle District of Florida, the defendants,

REGINALD REYNALD ROBERTS  
a/k/a “Rudy” and  
NATHANIEL KEITH CARR  
a/k/a “Nate”

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which the defendant may be prosecuted in a Court of the United States, specifically, interference with commerce by robbery, as alleged in Count Two above.

In violation of 18 U.S.C. § 924(c)(1)(A)(ii) and 18 U.S.C. § 2.

**COUNT FOUR**  
**(Interference with Commerce by Robbery)**

On or about January 14, 2021, in the Middle District of Florida and elsewhere, the defendants,

REGINALD REYNALD ROBERTS  
a/k/a “Rudy”,  
NATHANIEL KEITH CARR  
a/k/a “Nate”, and  
CHRISHAWN DE’EARL BUTLER  
a/k/a “Baby”

did knowingly in any way and degree, obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C. § 1951(b)(3), and the movement of any article and commodity in such commerce, by robbery, as that term is defined in 18 U.S.C. § 1951(b)(1), that is, by knowingly and unlawfully taking and obtaining personal property of A.W. and C.H., located at a residence on Embers Parkway in Cape

Coral, Florida, consisting of United States currency and narcotics, from the person and in the presence of another, against his or her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his or her person and property.

In violation of 18 U.S.C. § 1951(a) and (b) and 18 U.S.C. § 2.

**COUNT FIVE**  
**(Using, Carrying, and Brandishing a Firearm During  
and in Relation to a Crime of Violence)**

On or about January 14, 2021, in the Middle District of Florida, the  
defendants,

REGINALD REYNALD ROBERTS  
a/k/a "Rudy"  
NATHANIEL KEITH CARR  
a/k/a "Nate", and  
CHRISHAWN DE'EARL BUTLER  
a/k/a "Baby"

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which the defendant may be prosecuted in a Court of the United States, specifically, interference with commerce by robbery, as alleged in Count Four above.

In violation of 18 U.S.C. § 924(c)(1)(A)(ii) and 18 U.S.C. § 2.

**COUNT SIX**  
**(Interference with Commerce by Robbery)**

On or about February 25, 2021, in the Middle District of Florida and  
elsewhere, the defendants,

REGINALD REYNALD ROBERTS  
a/k/a "Rudy"

DANIEL JACKSON  
a/k/a "D-Jack", and  
CHRISHAWN DE'EARL BUTLER  
a/k/a "Baby"

did knowingly in any way and degree, obstruct, delay, and affect commerce, and did attempt to do so, as that term is defined in 18 U.S.C. § 1951(b)(3), and the movement of any article and commodity in such commerce, by robbery, as that term is defined in 18 U.S.C. § 1951(b)(1), that is, by knowingly and unlawfully taking and obtaining personal property of M.M., Y.P., and D.P., located at a residence on Reece Road in Plant City, Florida, consisting of Apple iPhones, jewelry, and narcotics, from the person and in the presence of another, against his or her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his or her person and property.

In violation of 18 U.S.C. § 1951(a) and (b) and 18 U.S.C. § 2.

**COUNT SEVEN**  
**(Using, Carrying, and Brandishing a Firearm During  
and in Relation to a Crime of Violence)**

On or about February 25, 2021, in the Middle District of Florida, the  
defendants,

REGINALD REYNALD ROBERTS  
a/k/a "Rudy",  
DANIEL JACKSON  
a/k/a "D-Jack", and  
CHRISHAWN DE'EARL BUTLER  
a/k/a "Baby"

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which the defendant may be prosecuted in a Court of the United States,

specifically, interference with commerce by robbery, as alleged in Count Six above.

In violation of 18 U.S.C. § 924(c)(1)(A)(iii) and 18 U.S.C. § 2.

**COUNT EIGHT**  
**(Interference with Commerce by Robbery)**

On or about February 26, 2021, in the Middle District of Florida and elsewhere, the defendants,

REGINALD REYNALD ROBERTS  
a/k/a “Rudy”,  
DANIEL JACKSON  
a/k/a “D-Jack”, and  
CHRISHAWN DE’EARL BUTLER  
a/k/a “Baby”

did knowingly in any way and degree, obstruct, delay, and affect commerce, and did attempt to do so, as that term is defined in 18 U.S.C. § 1951(b)(3), and the movement of any article and commodity in such commerce, by robbery, as that term is defined in 18 U.S.C. § 1951(b)(1), that is, by knowingly and unlawfully taking and obtaining personal property of K.J., A.T. and S.J., located at a residence on Lakeshore Drive in Lakeland, Florida, consisting of narcotics, and a firearm, from the person and in the presence of another, against his or her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his or her person and property.

In violation of 18 U.S.C. § 1951(a) and (b) and 18 U.S.C. § 2.

**COUNT NINE**  
**(Using, Carrying, and Brandishing a Firearm During  
and in Relation to a Crime of Violence)**

On or about February 26, 2021, in the Middle District of Florida, the

defendants,

REGINALD REYNALD ROBERTS  
a/k/a “Rudy”,  
DANIEL JACKSON  
a/k/a “D-Jack”, and  
CHRISHAWN DE’EARL BUTLER  
a/k/a “Baby”

did knowingly use, carry, and discharge a firearm during and in relation to a crime of violence for which the defendant may be prosecuted in a Court of the United States, specifically, interference with commerce by robbery, as alleged in Count Eight above.

In violation of 18 U.S.C. § 924(c)(1)(A)(iii) and 18 U.S.C. § 2.

**COUNT TEN**  
**(Interference with Commerce by Robbery)**

On or about March 30, 2021, in the Middle District of Florida and elsewhere,  
the defendants,

DANIEL JACKSON  
a/k/a “D-Jack” and  
CHRISHAWN DE’EARL BUTLER  
a/k/a “Baby”

did knowingly in any way and degree, obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C. § 1951(b)(3), and the movement of any article and commodity in such commerce, by robbery, as that term is defined in 18 U.S.C. § 1951(b)(1), that is, by knowingly and unlawfully taking and obtaining personal property of M.C., located at a residence on 10<sup>th</sup> Street in Zephyrhills, Florida, consisting of United States currency, from the person and in the presence of another, against his or her will, by means of actual and threatened force, violence, and fear of

injury, immediate and future, to his or her person and property.

In violation of 18 U.S.C. § 1951(a) and (b) and 18 U.S.C. § 2.

**COUNT ELEVEN**  
**(Using, Carrying, and Brandishing a Firearm During  
and in Relation to a Crime of Violence)**

On or about March 30, 2021, in the Middle District of Florida, the defendant,

DANIEL JACKSON  
a/k/a “D-Jack” and  
CHRISHAWN DE’EARL BUTLER  
a/k/a “Baby”

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which the defendant may be prosecuted in a Court of the United States, specifically, interference with commerce by robbery, as alleged in Count Ten above.

In violation of 18 U.S.C. § 924(c)(1)(A)(ii) and 18 U.S.C. § 2.

**FORFEITURE**

1. The allegations contained in Counts One through Eleven of this indictment are incorporated by reference for the purpose of alleging forfeiture, pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c).

2. Upon conviction of the violation of 18 U.S.C. § 1951, the defendants shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation and, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms or ammunition involved or used in the offenses.

3. Upon conviction of a violation of 18 U.S.C. §§ 922(g)(1) and/or 924(c), the defendant shall forfeit to the United States of America, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearm or ammunition involved in or used in a knowing violation.

4. If any of the property described above, 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;

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

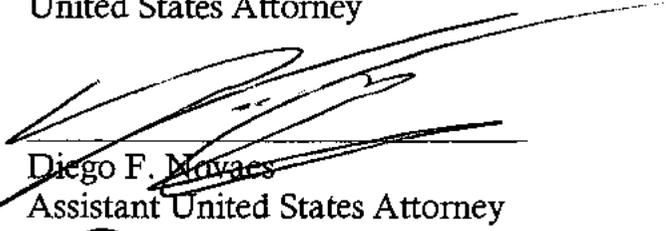
A TRUE BILL,



Foreperson

ROGER B. HANDBERG  
United States Attorney

By:

  
Diego F. Novaes  
Assistant United States Attorney

By:

  
James C. Preston Jr.  
Assistant United States Attorney  
Chief, Violent Crime and Narcotics Section

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.

REGINALD REYNALD ROBERTS a/k/a "Rudy"  
NATHANIEL KEITH CARR a/k/a "Nate"  
CHRISHAWN DE'EARL BUTLER a/k/a "Baby"  
DANIEL JACKSON a/k/a "D-Jack"

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INDICTMENT

Violations: 18 U.S.C. § 1951, 18 U.S.C. § 924(c), 18 U.S.C. § 401(3)

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Foreperson

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Filed in open court this 26<sup>th</sup> day  
of April 2022.

\_\_\_\_\_  
Clerk

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

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