

FILED**6/17/2022**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TARRION C. JOHNSON

CASE NUMBER: 22 CR 317

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Count One

On or about June 2, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant violated:

Code Section

Title 18, United States Code, Sections
111(a) and (b)

Offense Description

forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with a person designated in Title 18, United States Code, Section 1114, namely a Senior Inspector United States Marshal, while he was engaged in the performance of his official duties, and in the commission of such acts used a deadly and dangerous weapon

Count Two

On or about June 2, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant violated:

Code Section

Title 18, United States Code, Section
924(c)(1)(A)(iii)

Offense Description

knowingly used, carried, and discharged a firearm during and in relation to a crime of violence for which defendant may be prosecuted in a court of the United States, namely an assault of a Senior Inspector United States Marshal, in violation of Title 18, United States Code, Sections 111(a) and (b), as further set forth in Count One of this Complaint

This criminal complaint is based upon these facts:

 X Continued on the attached sheet.



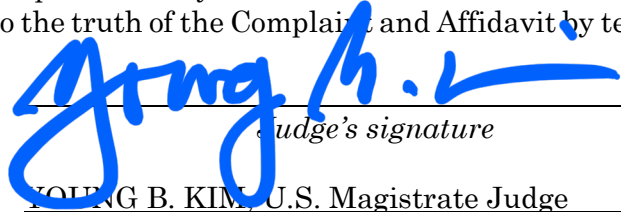
HAYDEN G. JOHNSON

Special Agent, Federal Bureau of Investigation
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: June 17, 2022

@ 12:01pm



Judge's signature

City and state: Chicago, Illinois

YOUNG B. KIM, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, Hayden G. Johnson, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI). I have been employed by the FBI since March 2019. As part of my duties as an FBI Special Agent, I investigate criminal violations including, but not limited to, bank robberies, kidnappings, the apprehension of violent fugitives, and the illegal possession of firearms.

2. This affidavit is submitted in support of a criminal complaint alleging that TARRION C. JOHNSON has violated Title 18, United States Code, Sections 111(a) and (b), and 924(c)(1)(A)(iii). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging JOHNSON with assault of a federal officer, and discharge of a firearm during a crime of violence, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offenses alleged in the complaint.

3. This affidavit is based on, among other things, my personal knowledge, my review of certain recordings, my experience and training, information provided to me by other law enforcement officers, and the experience and training of those officers.

FACTS SUPPORTING PROBABLE CAUSE

Background

4. On June 2, 2022, in the early afternoon, law enforcement officers with the Great Lakes Regional Fugitive Task Force (“Fugitive Task Force”) gathered in the vicinity of the 5200 block of West Belmont Avenue in Chicago, Illinois to effectuate a State arrest warrant for attempted murder and attempted robbery upon TARRION C. JOHNSON. The Fugitive Task Force had identified an apartment on that block, with an entrance facing the rear alley, as JOHNSON’s residence (“Subject Residence”).

5. According to information obtained from the Chicago Police Department (“CPD”), officers with the Fugitive Task Force observed JOHNSON exit the Subject Residence, walk to a nearby cellular phone store, and return to the Subject Residence a short time later. At that point, the Fugitive Task Force assembled to effectuate the arrest warrant. Members of the Task Force included Victim 1, who is a Senior Inspector United States Marshal, Victim 1’s Service K9, and Victim 2, who is a Chicago Police Department Officer and was deputized as a Special Deputy United States Marshal.

6. According to information obtained from CPD and my review of body worn camera footage, the Fugitive Task Force approached the Subject Residence and established a perimeter, with designated law enforcement officers deployed to make entry at the doorway in the rear alley. Every member of the Fugitive Task Force wore clothing clearly identifying them as law enforcement, such as ballistic vests

emblazoned with “POLICE” or police badges. According to body worn camera footage, law enforcement officers, including Victim 2, knocked on the door, announced “Police,” advised that they had a warrant, and then forced entry through the door, gaining access to the building. Entry through the doorway led to a covered porch, where officers encountered a secondary door, which provided direct access to the Subject Residence.

7. As captured on the body worn camera footage, upon entry to the covered porch, the Fugitive Task Force again announced they had a K9, that they were police, and they had a warrant. Law enforcement instructed the occupant to come out with hands up. Law enforcement continued to repeat these commands.¹

8. As captured on the body worn camera footage, law enforcement then yelled out to JOHNSON, addressing him multiple times, including by his full name, and advised him that they were the police and that they had a warrant. Upon still receiving no response, law enforcement officers, including Victim 2, forced entry into the secondary door, which provided direct access to the Subject Residence. According to information obtained from CPD, at the time law enforcement officers breached the secondary door, Victim 1 and his K9 partner were standing in the alley outside of the apartment on the west side.

9. As captured on the audio of the body worn camera footage, upon breach of the secondary door, Victim 2 immediately saw JOHNSON standing in the Subject

¹ At this point, law enforcement called out a different name other than JOHNSON in error. This was soon corrected.

Residence. According to that audio and information obtained from CPD, Victim 2 observed JOHNSON run into a side bedroom and then JOHNSON reappeared holding a firearm. According to my review of the audio captured by body worn cameras, Victim 2 called out “Gun!” multiple times to alert his teammates, then announced “Police.” Law enforcement again announced “Police.” According to information obtained from CPD and my review of the audio recording captured by body worn cameras, JOHNSON brandished the firearm at law enforcement, and Victim 2 fired a shot at JOHNSON.

10. According to information provided by CPD, JOHNSON reentered the side bedroom. JOHNSON fired approximately three shots through the bedroom window at Victim 1 and his K9, who were standing outside in the alley near the rear of the Subject Residence. Victim 1 and his K9 partner were struck by bullets. According to CPD and the audio of the body worn camera footage, after firing shots at Victim 1 and his K9 partner, JOHNSON reemerged into the living room and shot at Victim 2, striking Victim 2’s ballistic shield. Victim 2 returned fire. JOHNSON continued to ignore verbal commands by law enforcement officers to put the gun down and surrender.

11. JOHNSON then fled, exiting the Subject Residence from another door on the east side of the apartment, at which time he was arrested and taken into custody.

12. Shortly thereafter, an adult female exited the residence through the same door and was detained. Law enforcement officers secured the Subject Residence

until a later search, described below. At the time that JOHNSON and the female were detained, no other individuals were inside the Subject Residence.

13. Victim 1 and his K9 partner were both injured by JOHNSON's gunfire. Victim 1 was shot in the chest, with the bullet being stopped by his ballistic vest, and also suffered a gunshot wound to his finger. The K9 was shot in the shoulder and the bullet splintered, with fragments lodging in his lung.

14. After the shooting, law enforcement obtained and executed search warrants for the Subject Residence, including a basement and storage areas. Officers located a 9mm semiautomatic handgun in the side bedroom from where JOHNSON shot Victim 1 and his K9 partner. Law enforcement also recovered approximately three shell casings in the west gangway just outside of the side bedroom's window. Additional shell casings were located inside the residence in the side bedroom and the living room. Preliminary forensic analysis by the Illinois State Police Crime Lab revealed that these shell casings were consistent with being fired from the 9 mm handgun recovered in the side bedroom.

CONCLUSION

15. Based on the foregoing, I believe there is probable cause to believe that, on or about June 2, 2022, defendant TARRION C. JOHNSON (1) forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with a person designated in Title 18, United States Code, Section 1114, namely, a Senior Inspector United States Marshal, while he was engaged in the performance of his official duties, and in the commission of such acts used a deadly and dangerous weapon, in violation of Title 18,

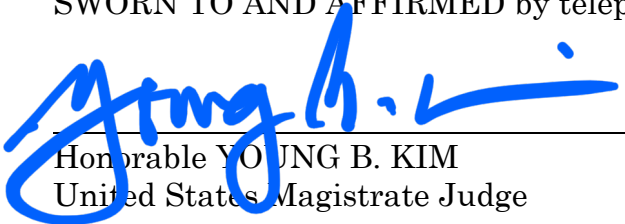
United States Code, Sections 111(a) and (b); and (2) knowingly used, carried, and discharged a firearm during and in relation to a crime of violence for which defendant may be prosecuted in a court of the United States, namely an assault of a Senior Inspector United States Marshal, in violation of Title 18, United States Code, Sections 111(a) and (b), as set forth in Count One of this Complaint, in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

FURTHER AFFIANT SAYETH NOT.



Hayden G. Johnson
Special Agent
Federal Bureau of Investigation

SWORN TO AND AFFIRMED by telephone on June 17, 2022.



Honorable YOUNG B. KIM
United States Magistrate Judge