

SEALED

COPY

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
JAN 23 2018
CLERK, U.S. DISTRICT COURT
By CAK
Dity

UNITED STATES OF AMERICA

v.

JARVIS BROUSSARD (01)
also known as "Koppo"
TREY NATHANIEL DICKERSON (02)
CHRISTIAN DEMOND GILBERT (03)
also known as "Go Getta"
RANDY LAMARK HAMMOND (04)
JOHN CHRISTOPHER JONES (05)
also known as "2tall"
BRANDON CHERMAINE MALLET (06)
also known as "Wookie"
CHRISHEENA LADALE MILBURN (07)
also known as "Beanz"
FERNANDO RAFAEL TAYLOR (08)
JONATHAN WALKER (09)
also known as "Johnathan Walker"

NO. **3-18CR-043-K**

FILED UNDER SEAL

INDICTMENT

The Grand Jury charges:

Count One

Conspiracy to Interfere with Commerce by Robbery
(Violation of 18 U.S.C. § 1951(a))

On or about February 4, 2016, and continuing until at least on or about July 22, 2017, in the Dallas Division of the Northern District of Texas and elsewhere, **Jarvis Broussard** (hereinafter "**Broussard**"), **Trey Nathaniel Dickerson**, (hereinafter "**Dickerson**"), **Christian Demond Gilbert** (hereinafter "**Gilbert**"), **Randy Lamark Hammond** (hereinafter "**Hammond**"), **John Christopher Jones** (hereinafter "**Jones**"), **Brandon Chermaine Mallet** (hereinafter "**Mallet**"), **Chrisheena Ladale Milburn** (hereinafter "**Milburn**"), **Fernando Rafael Taylor** (hereinafter "**Taylor**"), and

Jonathan Walker (hereinafter “**Walker**”), the defendants, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together and with each other, and with others known and unknown to the Grand Jury, to commit a certain offense against the United States, to wit: interference with commerce by robbery, in violation of 18 U.S.C. § 1951(a).

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to unlawfully take and obtain personal property, consisting of United States currency, from the persons and in the presence of employees, owners; and agents of businesses against their will by means of actual and threatened force, violence, and fear of immediate injury to their persons and property.

MANNER AND MEANS

1. It was part of the conspiracy that **Broussard, Dickerson, Gilbert, Hammond, Jones, Mallet, Milburn, Taylor, and Walker**, the defendants, and other persons known and unknown to the Grand Jury, discussed and planned with each other, among other things, one or more of the following robberies:

Date (on or about)	Business	Offense Location
June 21, 2016	Gene’s Liquor and Gene’s Check Cashing	2445 West Northwest Highway, Dallas, Texas
January 28, 2017	One Stop Food Store	Bordeaux Square, Irving, Texas
March 25, 2017	J&B Check Cashing	2418 S. Jupiter Road, Garland, Texas
April 22, 2017	La Casita Grocery & Deli	2111 Northwest Highway, Dallas, Texas
May 6, 2017	Kingsley Grocery	1433 W. Kingsley, Garland, Texas
May 27, 2017	Forest Ln 786 LLC	9798 Forest Lane, Dallas, Texas
June 29, 2017	Zaitoon Operation	11950 Webb Chapel Road, Dallas, Texas
July 14, 2017	Citywide ATM	2702 Elsie Faye Heggins Street, Dallas, Texas

At all times during the course and scope of the conspiracy, the above-mentioned businesses conducted business in interstate commerce, and the conspiracy would have, and did, in any way or degree, obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as contemplated by 18 U.S.C. § 1951.

2. It was further part of the conspiracy that the defendants and others known and unknown to the Grand Jury formulated a plan and agreement, which, among other things, included:

- a. the acquisition of United States currency;
- b. the surveillance and selection of individuals for robbery;
- c. the acquisition of property for use in committing robbery;
- d. the timing and means of transportation to commit robbery;
- e. the roles of participants during the preparation for and commission of robbery;
- f. the division of proceeds obtained from robbery; and
- g. plans to avoid detection and apprehension by law enforcement.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

To effect the object of the conspiracy, **Broussard, Dickerson, Gilbert, Hammond, Jones, Mallet, Milburn, Taylor, and Walker**, the defendants, and other persons known and unknown to the Grand Jury, committed overt acts within the Northern District of Texas, and elsewhere, including, but not limited to, the following:

1. On or about June 21, 2016, **Mallet, Milburn, Taylor**, and a person known to the Grand Jury, aided and abetted by each other, took personal property, consisting of a bag containing United States currency, from the person and in the presence of D.K., an

employee and agent of Gene's Liquor and Gene's Check Cashing, against his will, by means of actual or threatened force, violence, and fear of injury to his person.

2. On or about January 28, 2017, **Gilbert, Jones, Mallet, Milburn,** and **Walker**, aiding and abetting one another, took personal property, consisting of a bag containing United States currency, from the person and in the presence of B.P., an owner and agent of One Stop Food Store, against his will, by means of actual or threatened force, violence, and fear of injury to his person.

3. On or about March 25, 2017, **Hammond, Jones, Mallet,** and **Milburn**, aiding and abetting one another, took personal property, consisting of a bag containing United States currency, from the person and in the presence of A.R.J., owner and agent of J&B Check Cashing, against his will, by means of actual or threatened force, violence, and fear of injury to his person.

4. On or about April 22, 2017, **Broussard, Jones, Mallet,** and **Milburn**, aiding and abetting one another, attempted to take personal property, consisting of a bag containing United States currency, from the person and in the presence of J.A., an owner and agent of La Casita Grocery & Deli, against her will, by means of actual or threatened force, violence, and fear of injury to her person.

5. On or about May 6, 2017, **Hammond, Jones, Mallet,** and **Milburn**, aiding and abetting one another, took and attempted to take personal property, consisting of two bags containing United States currency, from the person and in the presence of A.A.J., owner and agent of Kingsley Grocery, against his will, by means of actual or threatened force, violence, and fear of injury to his person.

6. On or about May 27, 2017, **Hammond, Jones, Mallet, and Milburn**, aiding and abetting one another, took personal property, consisting of a box containing United States currency, from the person and in the presence of M.A., owner and agent of Forest Ln 786 LLC, against his will, by means of actual or threatened force, violence, and fear of injury to his person.

7. On or about June 29, 2017, **Dickerson, Hammond, Mallet, and Milburn**, aiding and abetting one another, took personal property, consisting of a bag containing United States currency, from and in the presence of N.A., a manager, employee, and agent of Zaitoon Operation, against his will, by means of actual or threatened force, violence, and fear of injury to his person, his property, and property in his custody and possession.

8. On or about July 14, 2017, **Dickerson, Gilbert, Mallet, and Milburn**, aiding and abetting one another, took personal property, consisting of a bag containing United States currency, from the person and in the presence of A.R., an employee and agent of Citywide ATM, against his will, by means of actual or threatened force, violence, and fear of injury to his person.

9. On or about July 22, 2017, **Dickerson, Gilbert, Jones, Mallet, and Milburn**, aiding and abetting one another, took a bag from inside a vehicle in the custody and possession of an undercover police officer.

In violation of 18 U.S.C. § 1951(a).

Counts Two through Nine
Interference with Commerce by Robbery
(Violation of 18 U.S.C. §§ 1951(a) and 2)

On or about the dates listed below, in the Dallas Division of the Northern District of Texas, the defendants listed below, aiding and abetting one another, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in 18 U.S.C. § 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in 18 U.S.C. § 1951, in that the defendants listed below, aiding and abetting one another, did unlawfully take, obtain, and attempt to take and obtain personal property, consisting of United States currency, from a person and in the presence of a person, in that person's capacity as owner, employee, officer, and agent of the businesses listed below and against that person's will by means of actual and threatened force, violence, and fear of immediate injury to the individual's person.

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

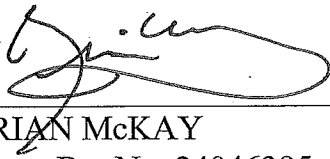
Count	Date (on or about)	Defendants	Business Victim
2	June 21, 2016	Mallet Milburn, Taylor	Gene's Liquor and Gene's Check Cashing
3	January 28, 2017	Gilbert Jones Mallet Milburn Walker	One Stop Food Store
4	March 25, 2017	Hammond Jones Mallet Milburn	J&B Convenience Store
5	April 22, 2017	Broussard Jones Mallet Milburn	La Casita Grocery
6	May 6, 2017	Hammond Jones Mallet Milburn	Kingsley Grocery
7	May 27, 2017	Hammond Jones Mallet Milburn	E-Z Trip #9
8	June 29, 2017	Dickerson Hammond Mallet Milburn	Zaitoon Operation
9	July 14, 2017	Dickerson Gilbert Mallet Milburn	Citywide ATM

A TRUE BILL



FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY



BRIAN MCKAY
Texas Bar No. 24046395
Assistant United States Attorney
1100 Commerce Street, Room 300
Dallas, Texas 75242
214-659-8600
brian.mckay@usdoj.gov