

ORIGINAL

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

UNITED STATES OF AMERICA

v.

CHARLES LAMPKINS (1)
aka "K3"
aka "KC"

JUSTIN GILBERT (2)
aka "Slim"

JAALA DILL (3)

JAHAD GIVENS (4)
aka "Had"

TERANCE ROSS JOHNSON (5)
aka "TJ"

CRIM NO.

3-17 CR - 416-L

INDICTMENT

The Grand Jury charges:

Introduction

At all material to this Indictment:

1. Between in or about October 2016 and in or about May 2017, a group of individuals, led by defendant **Charles Lampkins** committed a series of at least seven and up to twenty-one robberies at various motels, hotels, and other commercial establishments throughout the Dallas-Fort Worth metroplex.

2. This group of robbers, some of which referred to themselves as "Self-Made," and were believed to be connected to the Bloods street gang.

3. Certain members of the robbery crew performed pre-robbery surveillance of victims and targeted locations. Others members utilized firearms to intimidate their

victims and effectuate the robberies, often pointing guns at the heads of tellers and cashiers during the robberies. Finally, other members served as getaway drivers and facilitators for moving or converting stolen proceeds of the crimes.

4. The robbers often disguised themselves during the robberies by wearing dark clothes, hoodies, and other items meant to conceal their true identity. On certain occasions, one of the robbers wore a distinguishable fake blue beard connected to a stocking cap.

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

5. The Grand Jury re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 4 of the Introduction section of this Indictment, as if fully set forth herein.

6. On or about the dates listed below, in the Dallas Division of the Northern District of Texas, the defendants listed below, aided and abetted by each other and others unknown to the Grand Jury, 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, aided and abetted by each other, did unlawfully take and obtain personal property, consisting of United States currency, cellular telephones, and other things of value, from the individuals identified below, and against their will by means of actual and threatened force, violence, and fear of immediate injury to their person, that is, by using and brandishing a firearm.

Count	Date	Defendants	Location of Robbery	Individual(s) Robbed in addition to entity
1	February 17, 2017	Charles Lampkins Justin Gilbert	Motel 6 4024 Melear Drive, Arlington, Texas	K.C.
2	February 20, 2017	Charles Lampkins Justin Gilbert Jaala Dill	Super 8 Hotel 402 East Palace Parkway Grand Prairie, Texas	A.P. and K.N.
3	February 24, 2017	Charles Lampkins Justin Gilbert	Days Inn Hotel 13313 N. Stemmons Freeway, Farmers Branch, Texas	C.R.
4	March 20, 2017	Charles Lampkins Justin Gilbert Jaala Dill	Motel 6 2550 Central Expressway, Plano, Texas	A.K. and E.H.C.
5	March 21, 2017	Charles Lampkins Justin Gilbert Jaala Dill	Motel 6 4325 Belt Line Road Addison, Texas	J.M.
6	May 18, 2017	Charles Lampkins	Motel 6 1410 North Highway 161 Grand Prairie, Texas	V.B.
7	May 18, 2017	Charles Lampkins Terance Johnson Jahad Givens	Verizon Wireless Store 2450 Old Denton Road #154 Carrollton, Texas	T.K. and R.G.

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

Count Eight

Using, Carrying, Brandishing, and Discharging a Firearm
During and in Relation to, and Possessing, Brandishing, and Discharging
a Firearm in Furtherance of, a Crime of Violence
(Violation of 18 U.S.C. §§ 924(c)(1)(A)(ii) and 2)

7. The Grand Jury re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 4 of the Introduction section of this Indictment, as if fully set forth herein.

8. On or about February 20, 2017, in the Dallas Division of the Northern District of Texas, **Charles Lampkins**, the defendant, did knowingly use, carry, and brandish, a firearm, to-wit: a black semi-automatic handgun, during and in relation to a crime of violence, namely, interference with commerce by robbery, in violation of 18 U.S.C. § 1951(a), as alleged in Count Two of this Indictment, for which the defendant may be prosecuted in a court of the United States, and the defendant, aided and abetted by another, did knowingly possess, and brandish said firearm in furtherance of the commission of this offense.

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

Count Nine

Using and Carrying a Firearm During and in Relation to,
and Possessing a Firearm in Furtherance of, a Crime of Violence
(Violation of 18 U.S.C. §§ 924(c)(1)(C)(i) and 2)

9. The Grand Jury re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 4 of the Introduction section of this Indictment, as if fully set forth herein.

10. On or about May 18, 2017, in the Dallas Division of the Northern District of Texas, **Charles Lampkins**, the defendant, did knowingly use and carry a firearm, to-wit: a silver over black semi-automatic handgun with an extended clip, during and in relation to a crime of violence, namely, interference with commerce by robbery, in violation of 18 U.S.C. §§ 1951(a) and 2, as alleged in Count Six of this Indictment, for which the defendant may be prosecuted in a court of the United States, and the defendant did knowingly possess said firearm in furtherance of the commission of this offense.

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

Forfeiture Notice

(18 U.S.C. §§ 924(d) and 981(a)(1)(C); 28 U.S.C. § 2461(c))

11. Upon conviction for the offenses alleged in Counts One through Seven of the indictment and pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), **Charles Lampkins, Justin Gilbert, Jaala Dill, Terance Johnson, and Jahad Givens**, the defendants, shall forfeit to the United States of America any property, real or personal, constituting or derived from proceeds traceable to the respective offense.

12. Further, upon conviction for any of the offenses alleged in Counts Eight and Nine of the indictment and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), **Charles Lampkins**, the defendant, shall forfeit to the United States of America all firearms and ammunition involved or used in the commission of the offenses.

A TRUE BILL:



FOREPERSON

JOHN R. PARKER
UNITED STATES ATTORNEY



P.J. MEITL
Assistant United States Attorney
District of Columbia Bar No. 502391
Virginia Bar No. 73215
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8680
Facsimile: 214.659.8812
Email: philip.meitl@usdoj.gov

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INDICTMENT

18 U.S.C. §§ 1951(a) and 2
Interference with Commerce by Robbery

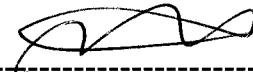
18 U.S.C. §§ 924(c)(1)(A)(ii) and 2
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18 U.S.C. §§ 924(d) and 981(a)(1)(C); 28 U.S.C. § 2461(c)
Forfeiture Notice

9 Counts

A true bill rendered



DALLAS

FOREPERSON

Filed in open court this 8th day of August, 2017.

Warrant to be Issued



UNITED STATES MAGISTRATE JUDGE

No Criminal Matter Pending