

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Crim. No. 23-
v.	:	
	:	
	:	18 U.S.C. § 1951(a)
CHARLES JOHNSON	:	18 U.S.C. § 924(c)(1)(A)(ii)

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE
(Hobbs Act Robbery)

1. At all times relevant to this Information, the business described below, Business-1, ordered and sold goods that moved in and affected interstate commerce and engaged in an industry that affected interstate commerce.

2. On or about June 4, 2022, in Union County, in the District of New Jersey, and elsewhere, the defendant,

CHARLES JOHNSON,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, in that the defendant did unlawfully take and obtain property by means of actual and threatened force, and violence, and fear of

injury, immediate and future, to the person and property of another, namely, Victim-1 and Victim-2, employees of Business-1.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO
(Hobbs Act Robbery)

1. At all times relevant to this Information, the business described below, Business-2, ordered and sold goods that moved in and affected interstate commerce and engaged in an industry that affected interstate commerce.

2. On or about June 16, 2022, in Union County, in the District of New Jersey, and elsewhere, the defendant,

CHARLES JOHNSON,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, in that the defendant did unlawfully take and obtain property by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of another, namely, Victim-3 and Victim-4, employees of Business-2, and Victim-5, a customer of Business-2.

In violation of Title 18, United States Code, Section 1951(a).

COUNT THREE
(Hobbs Act Robbery)

1. At all times relevant to this Information, the business described below, Business-3, ordered and sold goods that moved in and affected interstate commerce and engaged in an industry that affected interstate commerce.

2. On or about July 14, 2022, in Union County, in the District of New Jersey, and elsewhere, the defendant,

CHARLES JOHNSON,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, in that the defendant did unlawfully take and obtain property by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of another, namely, Victim-6, an employee of Business-3.

In violation of Title 18, United States Code, Section 1951(a).

COUNT FOUR
(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about July 14, 2022, in Union County, in the District of New Jersey, and elsewhere, the defendant,

CHARLES JOHNSON,

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, namely, the Hobbs Act Robbery charged in Count Three of this Information, did knowingly use and carry a firearm, which firearm was brandished.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

FORFEITURE ALLEGATION AS TO COUNTS ONE THROUGH THREE

As a result of committing the Hobbs Act robbery offenses alleged in Counts One, Two, and Three of this Information, the defendant,

CHARLES JOHNSON,

shall forfeit to the United States, (i) pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of such offenses, and (ii) pursuant to 18 U.S.C. § 924 and 28 U.S.C. § 2461, any firearm and ammunition involved in or used in the commission of such offenses.

FORFEITURE ALLEGATION AS TO COUNT FOUR

As a result of committing the offense alleged in Count Four of this Information, the defendant,

CHARLES JOHNSON,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of such offense.


Substitute Assets Provision
(Applicable to All Forfeiture Allegations)

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 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,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.


PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: _____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

CHARLES JOHNSON

INFORMATION FOR

**18 U.S.C. § 1951(a)
18 U.S.C. § 924(c)(1)(A)(ii)**

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FOR THE DISTRICT OF NEW JERSEY

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