
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
:
v. : Hon. André M. Espinosa, U.S.M.J.
:
CHARLES JOHNSON : Mag. No. 22-11296
:
:

I, Katelyn Prata, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Task Force Officer with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

/s/ Katelyn Prata
Katelyn Prata, Task Force Officer
Federal Bureau of Investigation

Task Force Officer Katelyn Prata attested to this Complaint by telephone pursuant to Fed. R. Crim. Pro. 4.1(b)(2)(A) on October 19, 2022 in the District of New Jersey

Honorable André M. Espinosa
United States Magistrate Judge

/s/ André M. Espinosa
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Hobbs Act Robbery)

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, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force, violence, and fear of injury, immediate or future, to the person and property of another, in furtherance thereof.

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

COUNT TWO

(Hobbs Act Robbery)

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, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force, violence, and fear of injury, immediate or future, to the person and property of another, in furtherance thereof.

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

COUNT THREE
(Hobbs Act Robbery)

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, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force, violence, and fear of injury, immediate or future, to the person and property of another, in furtherance thereof.

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

COUNT FOUR

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

On or about June 4, 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 One of this Complaint, did knowingly brandish and use a
firearm.

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

COUNT FIVE

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

On or about June 16, 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 Two of this Complaint, did knowingly brandish and use a
firearm.

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

COUNT SIX

(Using, Carrying, and 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 Complaint, did knowingly brandish and use a
firearm.

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

ATTACHMENT B

I, Katelyn Prata, am a Task Force Officer with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and video recordings of the evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Background of the Investigation

1. Law enforcement, including the Federal Bureau of Investigation (“FBI”), has been investigating three armed robberies of pharmacies (the “Robberies”) throughout Elizabeth, New Jersey. Over the course of the investigation, as described herein, law enforcement has identified the defendant, Charles Johnson (“JOHNSON”), as the perpetrator of the Robberies. JOHNSON utilized a similar approach for each of the Robberies, including using a firearm, committing the Robberies in the morning, demanding that employees of the pharmacies provide JOHNSON with oxycodone, promethazine, and other prescription medications, and threatening to shoot individuals in the pharmacies with a firearm.

2. During the investigation, law enforcement learned that a black Mazda CX-5 (the “Vehicle”) was used in the course of each of the Robberies, and that the Vehicle is registered to JOHNSON’S partner (“Individual-1”) at JOHNSON and Individual-1’s shared address in Irvington, New Jersey (the “Irvington Residence”).

The June 4, 2022 Armed Robbery (“Robbery-1”)

3. Video surveillance shows that on or about the morning of June 4, 2022, the Vehicle entered a parking lot near a pharmacy on North Broad Street in Elizabeth, New Jersey (“Pharmacy-1”). JOHNSON, wearing a blue graphic tee shirt, blue hat, round sunglasses, face mask, and black fanny pack worn cross-body, and carrying a shopping bag, exited the driver’s side of the Vehicle and, shortly thereafter, walked in the direction of Pharmacy-1.

4. According to video surveillance and witness accounts, JOHNSON entered Pharmacy-1, walked towards the customer counter, and handed an employee of Pharmacy-1 (“Victim-1”) a note demanding that Victim-1 provide JOHNSON with Oxycodone and Promethazine. After a brief verbal exchange with Victim-1, JOHNSON motioned towards what Victim-1 believed to be the handle of a firearm in his fanny pack and threatened to shoot the individuals inside

Pharmacy-1, including Victim-1. Victim-1 put the demanded Promethazine and Oxycodone inside JOHNSON's shopping bag. JOHNSON thereafter exited Pharmacy-1 and jogged in the direction of the Vehicle.

5. Video surveillance shows that, shortly thereafter, the Vehicle exited the parking lot and turned onto Newark Avenue in Elizabeth, New Jersey. JOHNSON can be seen driving the Vehicle wearing what appears to be a blue tee shirt, blue hat, and round sunglasses, consistent with his appearance prior to entering Pharmacy-1.

6. Moreover, a review of Automated License Plate Reader ("ALPR") reports revealed that the Vehicle was in the vicinity of Pharmacy-1 around the time of Robbery-1. Specifically, ALPR records revealed that the Vehicle was on Newark Avenue and Fairmount Avenue in Elizabeth, New Jersey—less than a quarter of a mile from Pharmacy-1—within minutes of Robbery-1.

7. Following Robbery-1, law enforcement entered the Vehicle into a law enforcement database. On June 5, 2022, law enforcement was alerted through the database that the Vehicle was in Elizabeth, New Jersey. When law enforcement conducted a lawful stop of the Vehicle, JOHNSON was driving the Vehicle, identified himself as JOHNSON, and provided law enforcement with an identification card in his name. He was not arrested at that time.

The June 16, 2022 Armed Robbery ("Robbery-2")

8. Video surveillance shows that on or about the morning of June 16, 2022, the Vehicle traveled on Union Street in Elizabeth, New Jersey before parking on Julian Place. Shortly thereafter, JOHNSON, wearing a red and black jacket, camouflage colored bucket hat, and a mask, and carrying a large red shopping bag, walked towards a nearby pharmacy in the downtown area of Elizabeth, New Jersey ("Pharmacy-2").

9. According to witness accounts, JOHNSON entered Pharmacy-2, demanded that an employee of Pharmacy-2 ("Victim-2") give him Oxycodone, Percocet, and Promethazine, pointed a firearm at Victim-2, and threatened to shoot the individuals in Pharmacy-2, including Victim-2. After Victim-2 provided JOHNSON with certain medications from Pharmacy-2's shelves, JOHNSON exited Pharmacy-2.

10. Shortly thereafter, video surveillance shows JOHNSON carrying a large red shopping bag and then discarding the red and black jacket and camouflage colored bucket hat that he wore during Robbery-2, which law enforcement subsequently recovered in the vicinity of where JOHNSON was observed discarding the items. Without the red jacket on, a black necklace with keys (the "Black Necklace") was visible around JOHNSON's neck. JOHNSON then returned to the Vehicle on Julian Place and drove away.

11. A review of ALPR reports revealed that the Vehicle was in the vicinity of Pharmacy-2 around the time of Robbery-2. Specifically, ALPR records revealed that the Vehicle was on Morris Avenue and Orchard Street in Elizabeth, New Jersey—less than a mile from Pharmacy-2 and less than half of a mile from where the Vehicle was parked on Julian Place—within minutes of Robbery-2.

The July 14, 2022 Armed Robbery (“Robbery-3”)

12. Video surveillance shows that on or about the afternoon of July 6, 2022, the Vehicle entered the parking lot of a supermarket near the downtown area of Elizabeth, New Jersey (the “Supermarket”) that has a pharmacy located inside (“Pharmacy-3”). Shortly thereafter, JOHNSON exited the Vehicle wearing a black Kappa tracksuit with the white Kappa logo going down the outer seams (the “Tracksuit”).

13. Video surveillance shows that, shortly thereafter, JOHNSON approached the customer counter of Pharmacy-3. The door to the area behind the customer counter had been left open. The top of JOHNSON’s Tracksuit was open and the Black Necklace was visible around JOHNSON’s neck. JOHNSON proceeded to speak with an employee of Pharmacy-3 (“Victim-3”), who, shortly thereafter, handed JOHNSON what appeared to be prescription medication. JOHNSON then made a friendly hand gesture with Victim-3 and left Pharmacy-3.

14. Video surveillance shows that approximately 8 days later, on or about the morning of July 14, 2022, the Vehicle parked on Lafayette Street in Elizabeth, New Jersey, approximately one and a half blocks away from Pharmacy-3. Shortly thereafter, JOHNSON exited the Vehicle wearing what appeared to be the same Tracksuit that JOHNSON was wearing on July 6, 2022, along with a face mask, hat, and sunglasses. JOHNSON then proceeded in the direction of Pharmacy-3.

15. Video surveillance shows that, shortly thereafter, JOHNSON entered the Supermarket and walked towards Pharmacy-3. Like on July 6, 2022, the door to the area behind the customer counter at Pharmacy-3 had been left open. JOHNSON walked behind the customer counter to where Victim-3 was standing and removed what appeared to be a firearm from his jacket pocket.

16. According to video surveillance and witness accounts, JOHNSON pressed a firearm into Victim-3’s back and demanded that Victim-3 give JOHNSON Oxycodone and Promethazine. Victim-3 complied. According to witness accounts, JOHNSON warned Victim-3 that if he called law enforcement, JOHNSON would shoot the individuals in and near Pharmacy-3.

17. Video surveillance shows that, shortly thereafter, JOHNSON exited Pharmacy-3 and headed in the direction of the Vehicle on Lafayette Street, which then fled the area.

18. A review of ALPR reports revealed that the Vehicle was in the vicinity of Pharmacy-3 around the time of Robbery-3. Specifically, ALPR records revealed that the Vehicle was on North Broad Street and Prince Street in Elizabeth, New Jersey less than an hour before Robbery-3. Moreover, video surveillance shows that JOHNSON operated the Vehicle near the intersection of Irvington Street and Prince Street—which is less than a quarter of a mile from North Broad Street and Prince Street—within five minutes of that ALPR hit.

19. In an audio-and-video-recorded statement following Robbery-3, Victim-3 identified the robber of Pharmacy-3 as JOHNSON. Victim-3 indicated that he believed that JOHNSON committed the robbery because JOHNSON regularly filled his own prescriptions at Pharmacy-3 and, as a result, recognized JOHNSON's voice and physical appearance. Victim-3 also located JOHNSON's profile and transaction records in Pharmacy-3's computer system, which included JOHNSON's name, phone number, and address (i.e., the Irvington Residence). Law enforcement confirmed that JOHNSON routinely filled his prescriptions, including for Oxycodone, at Pharmacy-3, including on or about July 6, 2022.

20. Following Robbery-3, the Elizabeth Police Department issued a warrant for JOHNSON's arrest (the "Elizabeth Warrant").

21. On or about July 22, 2022, law enforcement was alerted through a law enforcement database that the Vehicle was in Linden, New Jersey, and conducted a lawful stop of the Vehicle. The driver of the Vehicle identified himself as JOHNSON. Law enforcement arrested JOHNSON pursuant to the Elizabeth Warrant. At the time of his arrest, JOHNSON wore the Black Necklace around his neck.

The Continued Investigation

22. Following JOHNSON's arrest, JOHNSON provided an audio-and-video-recorded statement after having waived his Miranda rights in writing. During the course of that statement, JOHNSON stated that the Vehicle belonged to Individual-1, with whom he lived at the Irvington Residence, that he had regular access to the Vehicle, and that he regularly filled his prescriptions, including for Oxycodone, at Pharmacy-3. JOHNSON also provided his written consent to search the Vehicle.

23. On or about July 23, 2022, law enforcement conducted a lawful search of the Vehicle and recovered, among other things, what appeared to be three (3) bottles of prescription medications.

24. On or about July 25, 2022, Individual-1 provided an audio-and-video-recorded statement to law enforcement. During the course of that statement, Individual-1 stated that (i) JOHNSON lived with Individual-1 in the Irvington Residence, (ii) the Vehicle belonged to Individual-1, (iii) JOHNSON is the only individual other than individual-1 that Individual-1 knew had access to the Vehicle, and (iv) Individual-1 worked nights so typically slept in the mornings. Individual-1 also stated that Individual-1 recognized as JOHNSONS's clothing each of (i) the blue graphic tee shirt worn by JOHNSON during Robbery-1, (ii) the camouflage-colored bucket hat worn by JOHNSON during Robbery-2, and (iii) the Tracksuit worn by JOHNSON during Robbery-3.

25. During the investigation, law enforcement learned that a large quantity of the inventory at each of the robbed pharmacies was manufactured outside of the State of New Jersey and thus traveled in interstate commerce prior to each of the Robberies.