

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JABARI CLARKE,

Defendant.

SEALED INDICTMENT

26 Cr. 241

COUNT ONE

(Conspiracy to Commit Hobbs Act Robbery)

The Grand Jury charges:

1. From at least on or about May 5, 2025 through at least on or about June 19, 2025, in the Southern District of New York and elsewhere, JABARI CLARKE, the defendant, and others known and unknown, knowingly combined, conspired, confederated, and agreed together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, CLARKE agreed with others to rob gas stations and conveniences stores in Mount Vernon and New Rochelle, New York.

(Title 18, United States Code, Section 1951.)

COUNT TWO

(Hobbs Act Robbery)

The Grand Jury further charges:

2. On or about May 6, 2025, in the Southern District of New York and elsewhere, JABARI CLARKE, the defendant, knowingly committed robbery, as that term is defined in Title

18, United States Code, Section 1951(b)(1), and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, CLARKE robbed at gunpoint a gas station convenience store in the vicinity of West Lincoln Avenue and Oak Street in Mount Vernon, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT THREE
(Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

3. On or about May 6, 2025, in the Southern District of New York and elsewhere, JABARI CLARKE, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Two of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm, which was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and (ii), and 2.)

COUNT FOUR
(Hobbs Act Robbery)

The Grand Jury further charges:

4. On or about June 1, 2025, in the Southern District of New York and elsewhere, JABARI CLARKE, the defendant, knowingly committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in

Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, CLARKE robbed at gunpoint a convenience store in the vicinity of Pelham Road in New Rochelle, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT FIVE
(Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

5. On or about June 1, 2025, in the Southern District of New York and elsewhere, JABARI CLARKE, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Four of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm, which was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and (ii), and 2.)

COUNT SIX
(Hobbs Act Robbery)

The Grand Jury further charges:

6. On or about June 10, 2025, in the Southern District of New York and elsewhere, JABARI CLARKE, the defendant, knowingly committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, CLARKE

robbed at gunpoint a gas station convenience store in the vicinity of West Lincoln Avenue and North 7th Avenue in Mount Vernon, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT SEVEN
(Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

7. On or about June 10, 2025, in the Southern District of New York and elsewhere, JABARI CLARKE, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Six of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm, which was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and (ii), and 2.)

COUNT EIGHT
(Hobbs Act Robbery)

The Grand Jury further charges:

8. On or about June 19, 2025, in the Southern District of New York and elsewhere, JABARI CLARKE, the defendant, knowingly committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, CLARKE

robbed at gunpoint a gas station convenience store in the vicinity of South Columbus Avenue in Mount Vernon, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT NINE
(Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

9. On or about June 19, 2025, in the Southern District of New York and elsewhere, JABARI CLARKE, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Eight of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm, which was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and (ii), and 2.)

FORFEITURE ALLEGATION

10. As a result of committing the offenses alleged in Counts One, Two, Four, Six, and Eight of this Indictment, JABARI CLARKE, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

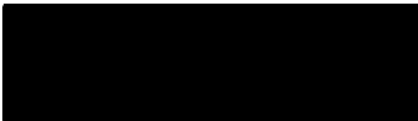
Substitute Assets Provision

11. If any of the above-described forfeitable property, 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 person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON



JAY CLAYTON
United States Attorney