

ORIGINAL

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By: James N. Hatten, Clerk
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

WILLIAM JACKSON AND
GERREN JOHNSON

Criminal Indictment

No. **1:17CR0159**

UNDER SEAL

THE GRAND JURY CHARGES THAT:

Count One

Beginning from on or about February 1, 2013, and continuing to on or about April 17, 2014, in the Northern District of Georgia and elsewhere, the defendants, WILLIAM JACKSON and GERREN JOHNSON, with each other and with others known and unknown, did willfully combine, conspire, confederate, and agree to engage in business of dealing in firearms without a license, in violation of Title 18, United States Code, § 922(a)(1)(A).

The Manner and Means

The conspirators would and did use the following manner and means, among others, to accomplish the objects of the conspiracy:

a. At all times relevant to the indictment, defendant Jackson and defendant Johnson, along with others known and unknown, acquired firearms through private sales.

b. At all times relevant to the indictment, the acquired firearms were subsequently posted for sale on the websites Black Market Reloaded ("BMR")

and Agora Market, which were TOR websites that were designed to make it difficult to identify the persons who accessed those sites. The firearms were specifically posted on vendor pages bearing the profile names CherryFlavor and CherryFlavor_2, respectively.

c. Interested buyers would send a message to the vendor, CherryFlavor or CherryFlavor_2, indicating the firearm they wanted to purchase.

d. The buyers, who all resided outside the United States, paid for the firearms using Bitcoins, a cryptocurrency which makes the transactions difficult to trace to the parties involved.

e. The defendants, aided and abetted by each other and other known persons, concealed the firearms in electronic items and mailed them to buyers abroad using the United States Post Office. These packages were shipped to various countries, to include Australia, Austria, Belgium, Canada, Denmark, France, Germany, the Netherlands, Sweden, and the United Kingdom.

Overt Acts

To further the objectives of the conspiracy, and to accomplish its goals, the following overt acts, among others, were committed in the Northern District of Georgia and elsewhere:

- a. On or about February 1, 2013, defendant Johnson purchased from a local seller an Armitage International, Model Scarab Skorpion, 9mm pistol, SN# 00643.
- b. On or about March 12, 2013, the Skorpion pistol referenced in paragraph a was recovered in the Netherlands. The buyer, who was located in the

Netherlands, advised that the buyer purchased the firearm from BMR vendor CherryFlavor.

- c. On or about May 4, 2013, defendant Jackson purchased a Zastava, Model CZ, 9mm pistol, SN# 96378.
- d. On or about May 27, 2013, BMR vendor CherryFlavor sold a Zastava pistol to a buyer located in Australia.
- e. On or about June 1, 2013, Australian agents intercepted a package that they subsequently searched. During the search, the agents found the Zastava pistol, bearing SN# 96378, hidden inside a karaoke machine.
- f. On or about June 18, 2013, the Australian buyer of the Zastava pistol, referenced in paragraphs c, d, and e, advised that he purchased the firearm from BMR vendor CherryFlavor.
- g. On or about November 6, 2013, defendant Johnson purchased from a local seller a Cobray, Model M-11 Georgia Commemorative, 9mm pistol.
- h. On or about November 8, 2013, BMR vendor CherryFlavor posted a Cobray pistol for sale.
- i. On or about April 1, 2014, defendant Johnson purchased from a local seller a Glock, Model 17 Gen 4, 9mm pistol, SN# WMX221.
- j. On or about April 2, 2014, Agora vendor CherryFlavor_2 sold a Glock, Model 17 Gen 4, 9mm pistol to a buyer located in France.
- k. On or about April 2, 2014, a Postal Inspector intercepted a box at the U.S. Post Office in Lithonia, Georgia after a known co-conspirator delivered it for shipment abroad. During a subsequent search of that box, agents

located a Glock, Model 17 Gen 4, 9mm pistol, SN# WMX221, hidden inside a speaker. The recipient address listed on the intercepted package was Sebbagh Alexandre, Post Restante, La Poste, Allee Andre Bemoist, 77410 Claye-Souilly, France.

All in violation of Title 18, United States Code, § 371.

Count Two

On or about May 28, 2013, in the Northern District of Georgia, the defendant WILLIAM JACKSON, aided and abetted by others known, did fraudulently and knowingly export and send from the United States merchandise, articles and objects, that being a Zastava, Model CZ, 9mm firearm, contrary to the laws and regulations of the United States, in that the firearm was not declared to a contract and common carrier, in violation of Title 18, United States Code, § 922(e), all in violation of Title 18, United States Code, §§ 554 and 2.

Count Three

On or about April 2, 2014, in the Northern District of Georgia, the defendant GERREN JOHNSON, aided and abetted by others known, did fraudulently and knowingly export and send from the United States merchandise, articles and objects, that being a Glock, Model 17 Gen 4, 9mm firearm, contrary to the laws and regulations of the United States, in that the firearm was not declared to a contract and common carrier, in violation of Title 18, United States Code, § 922(e), all in violation of Title 18, United States Code, §§ 554 and 2.

Forfeiture Provision

Upon conviction of the offense alleged in the Indictment, the defendants, WILLIAM JACKSON and GERREN JOHNSON, shall forfeit to the United States pursuant to 18 U.S.C. § 924 (d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in the commission of the offense, including, but limited to, the following:

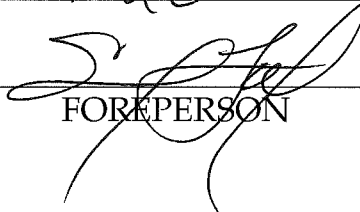
- a. Glock, Model 17 Gen 4, 9mm pistol, SN# WMX221;
- b. Armitage, Model Scarab Skorpion, 9mm pistol, SN# 00643;
- c. Zastava, Model CZ, 9mm pistol, SN# 96378; and
- d. Cobray, Model M-11 Georgia Commemorative, 9mm pistol.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):


- (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 said defendants up to the value of the forfeitable property described above.

A TRUE BILL

FOREPERSON

JOHN A. HORN
United States Attorney



TRACIA M. KING
Assistant United States Attorney
Georgia Bar No. 421380



STEPHANIE GABAY-SMITH
Assistant United States Attorney
Georgia Bar No. 663519

600 U.S. Courthouse
75 Ted Turner Drive SW
Atlanta, GA 30303
404-581-6000; Fax: 404-581-6181