



IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

JON KARL MCREE FLEET,

Defendant.

Case No. 1:21-cr-192

Count 1: 18 U.S.C. § 1951(a)
(Conspiracy to Commit Hobbs Act
Robbery)

Counts 2-5: 18 U.S.C. §§ 1951(a) & 2
(Hobbs Act Robbery)

Counts 6-9: 18 U.S.C. §§ 924(c)(1)(A)(ii)
and 2
(Using, Carrying, and Brandishing a
Firearm During and in Relation to a Crime
of Violence)

Count 10: 18 U.S.C. § 922(g)(1)
(Possession of a Firearm by a Prohibited
Person)

Forfeiture Notice

INDICTMENT

August 2021 Term – Alexandria, Virginia

Count One
(Conspiracy to Commit Hobbs Act Robbery)

THE GRAND JURY CHARGES THAT:

In and around February 2021, in the Eastern District of Virginia and elsewhere, the defendant, JON KARL MCREE FLEET, did knowingly and unlawfully combine, conspire, confederate, and agree with others, known and unknown to the grand jury, to commit an offense against the United States: namely, to obstruct, delay, and affect commerce by robbery, in violation of Title 18, United States Code, Section 1951(a).

Ways, Manner, and Means to Accomplish the Conspiracy

The primary purpose of the conspiracy was to obtain money from businesses in the Eastern District of Virginia and Maryland by way of armed robbery. The ways, manner, and means by which this purpose was carried out included the following:

1. It was part of the conspiracy that members of the conspiracy played different roles, took upon themselves different tasks, and participated in the affairs of the conspiracy through various criminal acts.
2. It was further part of the conspiracy that members of the conspiracy traveled in interstate commerce to commit armed robberies of commercial establishments.
3. It was further part of the conspiracy that members of the conspiracy entered the commercial establishments, armed with a firearm and partially concealing their faces, for the purpose of robbing the commercial establishments.
4. It was further part of the conspiracy that members of the conspiracy brandished firearms and threatened employees of the commercial establishments.
5. It was further part of the conspiracy that members of the conspiracy stole money from the commercial establishments.
6. It was further part of the conspiracy that members of the conspiracy used a vehicle to travel to and flee from the commercial establishments, allowing them to ensure the continuing existence and success of the conspiracy.

Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, JON KARL MCREE FLEET and his conspirators committed overt acts in the Eastern District of Virginia and elsewhere, including, but not limited to, the following:

1. On or about February 21, 2021, JON KARL MCREE FLEET and an unidentified conspirator traveled to the Subway restaurant located at 10428 Campus Way South, Largo, Maryland, for the purpose of committing an armed robbery.

2. On or about February 21, 2021, JON KARL MCREE FLEET, armed with a firearm and partially concealing his face, entered the Subway restaurant located 10428 Campus Way South, Largo, Maryland.

3. On or about February 21, 2021, JON KARL MCREE FLEET, while inside the Subway restaurant located at 10428 Campus Way South, Largo, Maryland, brandished a firearm and demanded an employee of the Subway restaurant open the cash register.

4. On or about February 21, 2021, JON KARL MCREE FLEET took approximately \$500 in United States currency that belonged to the Subway restaurant located at 10428 Campus Way South, Largo, Maryland.

5. On or about February 23, 2021, JON KARL MCREE FLEET and an unidentified conspirator traveled to the Papa John's restaurant located at 5860 Columbia Pike, Falls Church, Virginia, for the purpose of committing an armed robbery.

6. On or about February 23, 2021, JON KARL MCREE FLEET, armed with a firearm and partially concealing his face, entered the Papa John's restaurant located at 5860 Columbia Pike, Falls Church, Virginia.

7. On or about February 23, 2021, JON KARL MCREE FLEET, while inside the Papa John's restaurant located at 5860 Columbia Pike, Falls Church, Virginia, brandished a firearm and ordered an employee of the Papa John's restaurant to open the cash register.

8. On or about February 23, 2021, JON KARL MCREE FLEET, while inside the Papa John's restaurant located at 5860 Columbia Pike, Falls Church, Virginia, brandished a firearm and demanded money from a second employee of the Papa John's restaurant.

9. On or about February 23, 2021, JON KARL MCREE FLEET took approximately \$187 in United States currency that belonged to the Papa John's restaurant located at 5860 Columbia Pike, Falls Church, Virginia.

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

Count Two
(Hobbs Act Robbery)

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 24, 2021, in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, JON KARL MCREE FLEET, did knowingly 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 as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain personal property consisting of approximately \$300 in United States currency belonging to the Macy's store located at 6400 Springfield Mall, in Springfield, Virginia, in the presence of an employee against the employee's will by means of actual and threatened force, violence, and fear of immediate and future injury to his person, while the employee engaged in commercial activities as an employee of the Macy's store, a business that was engaged in and affected interstate commerce.

(In violation of Title 18, United States Code, Sections 1951(a) and 2.)

Count Three
(Hobbs Act Robbery)

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 12, 2021, in Alexandria, Virginia, within the Eastern District of Virginia, the defendant, JON KARL MCREE FLEET, did knowingly 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 as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain personal property consisting of approximately \$145.36 in United States currency belonging to the McDonald's restaurant located at 505 South Van Dorn Street, in Alexandria, Virginia, in the presence of an employee against the employee's will by means of actual and threatened force, violence, and fear of immediate and future injury to his person, while the employee engaged in commercial activities as an employee of the McDonald's restaurant, a business that was engaged in and affected interstate commerce.

(In violation of Title 18, United States Code, Sections 1951(a) and 2.)

Count Four
(Hobbs Act Robbery)

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 23, 2021, in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, JON KARL MCREE FLEET, did knowingly 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 as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain personal property consisting of approximately \$187 in United States currency belonging to the Papa John's restaurant located at 5860 Columbia Pike, in Falls Church, Virginia, in the presence of an employee against the employee's will by means of actual and threatened force, violence, and fear of immediate and future injury to his person, while the employee engaged in commercial activities as an employee of the Papa John's restaurant, a business that was engaged in and affected interstate commerce.

(In violation of Title 18, United States Code, Sections 1951(a) and 2.)

Count Five
(Hobbs Act Robbery)

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 13, 2021, in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, JON KARL MCREE FLEET, did knowingly 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 as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain personal property consisting of approximately \$386.59 in United States currency belonging to the Domino's Pizza restaurant located at 8133 Watson Street, in McLean, Virginia, in the presence of an employee against his will by means of actual and threatened force, violence, and fear of immediate and future injury to his person, while the employee engaged in commercial activities as an employee of the Domino's Pizza, a business that was engaged in and affected interstate commerce.

(In violation of Title 18, United States Code, Sections 1951(a) and 2.)

Count Six

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

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 24, 2021, in Alexandria, Virginia, within the Eastern District of Virginia, the defendant, JON KARL MCREE FLEET, did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the January 24, 2021 interference with commerce by robbery of the Macy's store located at 6400 Springfield Mall, in Springfield, Virginia, as set forth and charged in Count Two of this Indictment, and did knowingly possess such firearm in furtherance of the crime of violence.

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

Count Seven

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

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 12, 2021, in Alexandria, Virginia, within the Eastern District of Virginia, the defendant, JON KARL MCREE FLEET, did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the February 12, 2021 interference with commerce by robbery of the McDonald's restaurant located at 505 South Van Dorn Street, in Alexandria, Virginia, as set forth and charged in Count Three of this Indictment, and did knowingly possess such firearm in furtherance of the crime of violence.

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

Count Eight

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

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 23, 2021, in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, JON KARL MCREE FLEET, did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the February 23, 2021 interference with commerce by robbery of the Papa John's restaurant located at 5860 Columbia Pike, in Falls Church, Virginia, as set forth and charged in Count Four of this Indictment, and did knowingly possess such firearm in furtherance of the crime of violence.

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

Count Nine

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

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 13, 2021, in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, JON KARL MCREE FLEET, did knowingly use, carry, and brandish a firearm, namely, a short-barreled shotgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the March 13, 2021 interference with commerce by robbery of the Domino's Pizza restaurant located at 8133 Watson Street, in McLean, Virginia, as set forth and charged in Count Five of this Indictment, and did knowingly possess such firearm in furtherance of the crime of violence.

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

Count Ten

(Possession of a Firearm by a Prohibited Person)

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 13, 2021, in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, JON KARL MCREE FLEET, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, namely, on or on or about February 14, 2002, in Charles County Circuit Court, Maryland, armed robbery, and on or about April 2, 2002 in Anne Arundel County Circuit Court, Maryland, armed robbery, knowingly possessed in and affecting interstate and foreign commerce a firearm, specifically, a Harrington and Richardson, model Topper M-48, 16-gauge caliber, single-shot short-barreled shotgun, bearing Serial H-79060.

(In violation of Title 18, United States Code, Section 922(g)(1).)

FORFEITURE NOTICE

THE GRAND JURY FINDS PROBABLE CAUSE FOR FORFEITURE AS DESCRIBED BELOW:

Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, the defendant, JON KARL MCREE FLEET, is hereby notified that upon conviction of the violations set forth in Counts One through Five of this Indictment, the defendant, JON KARL MCREE FLEET, 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 property, real or personal, which constitutes or is derived from proceeds traceable to the offenses charged in those Counts.

Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, the defendant, JON KARL MCREE FLEET, is hereby notified that upon conviction of any of the violations set forth in this Indictment, the defendant, JON KARL MCREE FLEET, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), all firearms and ammunition used in or involved in the commission of the offense. This property includes, but is not limited to, the following:

- a. Harrington and Richardson, model Topper M-48, 16-gauge caliber, single-shot short-barreled shotgun, Serial H-79060, and any accompanying magazines and ammunition;
- b. Four rounds of Remington 20GA ammunition; and
- c. Two rounds of Remington Peters 16GA ammunition.

Pursuant to 21 U.S.C. § 853(p), the defendant, JON KARL MCREE FLEET, shall forfeit substitute property, if, by any act or omission of the defendant, JON KARL MCREE FLEET, the property referenced above cannot be located upon the exercise of due diligence; has been

transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

(Pursuant to Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C); Title 28, United States Code, Section 2461(c); and Rule 32.2(a) of the Federal Rules of Criminal Procedure.)

**Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.**

Foreperson of the Grand Jury

Raj Parekh
Acting United States Attorney

By:



Bibeane Metsch
Cristina C. Stam
Assistant United States Attorneys