
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
v. :
GREGORY BROWN : Mag. No. 11-4049 (CCC)

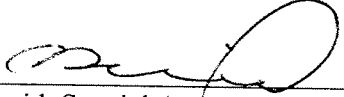
I, Ajit David, being duly sworn state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

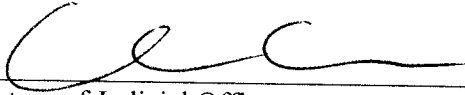


Ajit David, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in presence,

March 11, 2011, at Newark, New Jersey

HONORABLE CLAIRE C. CECCHI
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count One

On or about January 14, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant GREGORY BROWN, with the intent to cause death and serious bodily harm, knowingly took a motor vehicle, namely a 2007 Nissan Altima, that had been transported, shipped and received in interstate and foreign commerce from the person and presence of another, namely M.S., by force and violence and by intimidation.

In violation of Title 18, United States Code, Section 2119 and Section 2.

Count Two

On or about January 14, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant GREGORY BROWN, with the intent to cause death and serious bodily harm, knowingly took a motor vehicle, namely a 2005 Acura, that had been transported, shipped and received in interstate and foreign commerce from the person and presence of another, namely A.S. and K.S., by force and violence and by intimidation.

In violation of Title 18, United States Code, Section 2119 and Section 2.

ATTACHMENT B

I, AJIT DAVID, am a Special Agent with the Federal Bureau of Investigation. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Where statements of others are set forth herein, these statements are related in substance and in 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.

1. On or about Friday, January 14, 2011, at or around 7:45 a.m., a 2007 black Nissan Altima ("Altima") was carjacked from victim M.S. in Newark, Essex County, New Jersey (hereinafter the "Altima Carjacking").

2. M.S. later provided a statement to law enforcement regarding the Altima Carjacking. According to M.S., M.S.'s Altima was parked in front of a residence in Newark, New Jersey. M.S. exited the vehicle with his toddler when three black males pulled up in a black Acura TL ("the Black Acura").

3. According to M.S., the Black Acura appeared to be a 2010 model, based on the appearance of the rear exterior of the Black Acura. Based on my investigation, the Acura TL was redesigned in and around 2009, and this redesigned model included distinct modifications to the rear exterior of the vehicle.

4. According to M.S., Co-Conspirator #1, later identified as defendant GREGORY BROWN ("defendant BROWN") exited the Black Acura, threatened M.S. that he was taking M.S.'s car, and jumped into the driver's seat of the Altima. Co-Conspirator #2 opened the front passenger side door of the Black Acura and yelled at defendant BROWN to hurry and drive the carjacked vehicle away. Co-Conspirator #2 was inside the Black Acura along with Co-Conspirator #3, who was in possession of a firearm.

5. According to M.S., M.S. walked towards the Altima and attempted to open the passenger side door of the Nissan Altima, but defendant BROWN, who was already inside the vehicle, locked the doors and sped off. Victim M.S. observed Co-Conspirators #2 and #3 inside the Black Acura, before it drove off behind the Altima.

6. Later that morning, on or about January 14, 2011, the Altima, which was determined to have been manufactured in Smyrna, Tennessee, was located by law enforcement in Irvington, New Jersey.

7. That same day, on or about January 14, 2011, at or about 11:00 a.m., a 2005 white Acura TL ("the White Acura") was carjacked from victims A.S. and K.S. in Newark, Essex County, New Jersey (hereinafter "the White Acura Carjacking"). Both victims later each provided a statement to law enforcement regarding the White Acura Carjacking.

8. According to both victims, they were seated in the front seat of the White Acura when a black male opened the driver's side door, pointed a gun at the driver, and ordered them out of the car. According to the victims, the gunman racked the gun and directed the victims to cross the street without turning around. The victims complied.

9. Once out of the White Acura, the victims saw that their car had been boxed in by a late model black Acura TL, later determined to be the same Black Acura as was used in the Altima Carjacking. Two other men wearing masks covering the lower half of their faces were inside the Black Acura. The men inside the Black Acura commanded the victims to stay away from the White Acura as the gunman drove off in the White Acura, followed by the two men inside the Black Acura.

10. The White Acura, which was determined to have been manufactured in Marysville, Ohio, was recovered by law enforcement in Newark, New Jersey shortly after the carjacking occurred.

11. On or about February 8, 2011, six photographs, including a photograph of defendant BROWN, were shown sequentially to M.S., the victim of the Altima Carjacking. M.S. positively identified defendant BROWN as the individual who drove off in M.S.'s Altima.