
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Mag. No. 15-6501
: :
v. : Hon. Joseph A. Dickson
: :
RAHEEM SYLLA : **CRIMINAL COMPLAINT**
: :
: :


I, Michael Alongi, 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 Bureau of Alcohol Tobacco, Firearms and Explosives and that this Complaint is based on the following facts:

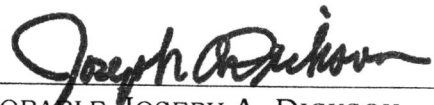
SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Michael Alongi, Special Agent
Bureau of Alcohol, Tobacco, Firearms,
and Explosives

Sworn to before me and subscribed in my presence,
on January 29, 2015, at Newark, New Jersey



HONORABLE JOSEPH A. DICKSON
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Count One

(Theft of a Motor Vehicle by Force, Violence, and by Intimidation)

On or about September 22, 2014, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

RAHEEM SYLLA,
a/k/a "Reem Sylla,"

with the intent to cause death and serious bodily harm, did knowingly take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce, namely, a 2000 Chevrolet Tahoe, from the person and presence of another, namely, "Victim 1," by force and violence and by intimidation.

In violation of Title 18, United States Code, Section 2119(1) and Section 2.

Count Two

(Use of a Firearm in Furtherance of a Crime of Violence)

On or about September 22, 2014, in Essex County, in the District of New Jersey, and elsewhere, the defendant

RAHEEM SYLLA,
a/k/a "Reem Sylla,"

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the carjacking set forth in Count One of this Complaint, did knowingly use and carry a firearm, which was brandished, and did aid and abet the same.

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

ATTACHMENT B

I, Michael Alongi, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. 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 September 22, 2014, at approximately 1:30 a.m. Victim 1 and Victim 2 were seated in the front seats of Victim 1's car, a 2000 Chevrolet Tahoe ("Tahoe") while it was parked on a street in Newark, New Jersey. An individual, later identified as defendant RAHEEM SYLLA ("SYLLA"), approached the front driver's window of the Tahoe. SYLLA pointed a firearm at Victim 1's chest and ordered Victim 1 out of the car. SYLLA was accompanied by another male ("Coconspirator"), who approached the front passenger's side window of the Tahoe and ordered Victim 2 out of the car. SYLLA and the Coconspirator then entered Victim 1's car and fled the area.
2. A short time later, a Rutgers University police officer observed the Tahoe being driven and attempted to conduct a traffic stop of the Tahoe. SYLLA tried to escape by driving away at a high rate of speed, but soon crashed the Tahoe and was quickly thereafter apprehended by the Rutgers University police officer. A firearm was recovered from the Tahoe.
3. Victim 1 subsequently positively identified SYLLA as the individual who carjacked Victim 1.
4. Victim 1's Tahoe was not manufactured in the State in the State of New Jersey.