

Approved: Amfgrswold
ANDREA M. GRISWOLD/RICHARD COOPER
Assistant United States Attorneys

Before: HONORABLE GABRIEL W. GORENSTEIN
United States Magistrate Judge
Southern District of New York

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: UNITED STATES OF AMERICA : SEALED COMPLAINT
: :
: - v. - : Violations of
: : 18 U.S.C. §§ 1951 and 2
: ALLEN WILLIAMS, :
: ROBERTO GRANT, : COUNTY OF OFFENSE:
: a/k/a "Roberto Cross," : NEW YORK
: a/k/a "Berto," :
: TERRELL RATLIFF, :
: TYRONE DEHOYOS, and :
: a/k/a "Tyrone Cross," :
: Defendants. :
: :
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SOUTHERN DISTRICT OF NEW YORK, ss.:

DANIEL McCaffrey, being sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI") and charges as follows:

COUNT ONE

1. From at least on or about July 1, 2013, up through and including on or about January 30, 2014, in the Southern District of New York and elsewhere, ALLEN WILLIAMS, ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," TERRELL RATLIFF, and TYRONE DEHOYOS, a/k/a "Tyrone Cross," the defendants, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree 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, WILLIAMS, GRANT, RATLIFF, DEHOYOS, and others committed robberies of jewelry and

watch stores, which sell goods that had been manufactured and shipped in interstate commerce.

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

COUNT TWO

2. On or about July 1, 2013, in the Southern District of New York and elsewhere, ALLEN WILLIAMS, ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," and TERRELL RATLIFF, the defendants, and others known and unknown, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), 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, WILLIAMS, GRANT, RATLIFF, and others committed a robbery of a jewelry store located in Atlantic City, New Jersey, which was engaged in the sale of watches and other items in interstate commerce.

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

COUNT THREE

3. On or about August 31, 2013, in the Southern District of New York and elsewhere, ALLEN WILLIAMS and ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," the defendants, and others known and unknown, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), 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, WILLIAMS, GRANT, and others committed a robbery of a jewelry store located in Richmond, Virginia, which was engaged in the sale of watches and other items in interstate commerce.

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

COUNT FOUR

4. On or about January 19, 2014, in the Southern District of New York and elsewhere, ALLEN WILLIAMS, ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," and TYRONE DEHOYOS, a/k/a "Tyrone Cross," the defendants, and others known and unknown, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), 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, WILLIAMS, GRANT, DEHOYOS, and others committed a robbery of a jewelry store located in Cranford, New Jersey which was engaged in the sale of watches and other items in interstate commerce.

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

COUNT FIVE

5. On or about January 30, 2014, in the Southern District of New York, ALLEN WILLIAMS, ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," the defendants, and others known and unknown, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), 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, WILLIAMS, GRANT, and others committed a robbery of a jewelry store located in Manhattan, New York, which was engaged in the sale of watches and other items in interstate commerce.

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

The bases for my knowledge and the foregoing charges are, in part, as follows:

6. I have been a special agent with the FBI for approximately 18 years. I am currently assigned to the Interstate Robbery Apprehension Team, and I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law enforcement agents, my conversations with witnesses and victims, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

THE ROBBERY PATTERN

7. I and other members of the FBI and New York City Police Department ("NYPD") are currently investigating a pattern

of robberies of jewelry stores (the "Robbery Pattern") across several states including New York, New Jersey, and Virginia. Based on our investigation, we have identified approximately four robberies as being part of the Robbery Pattern, which appear to me to be perpetrated by ALLEN WILLIAMS, ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," TERRELL RATLIFF, and TYRONE DEHOYOS, a/k/a "Tyrone Cross," the defendants, and others known and unknown.

8. The Robbery Pattern includes the robbery of a jewelry store located at the Borgata Hotel and Casino in Atlantic City, New Jersey on July 1, 2013 (the "July 1, 2013 Robbery"); the robbery of Schwarzschild's Jewelers, a jewelry store located on West Cary Street in Richmond, Virginia on August 3, 2013 (the "August 3, 2013 Robbery"); the robbery of Martin Jewelers, a jewelry store in Cranford, New Jersey on January 9, 2014 (the "January 9, 2014 Robbery"); and the robbery of Cartier, a jewelry store located at 653 Fifth Avenue, in Manhattan, New York on January 30, 2014 (the "January 30, 2014 Robbery") (collectively, the "Robberies").

9. From my investigation, which has included, among other things, reviewing video surveillance and talking to victims and witnesses, I have learned the following information about the Robbery Pattern:

- i. High-end jewelry and watch stores are targeted;
- ii. The robbers typically visit each jewelry or watch store in advance of a robbery to identify the store layout and location of high-end merchandise, typically watches;
- iii. On the day of a robbery, more than one robber enters the store during business hours when there are customers and employees in the store;
- iv. Upon entering the store, the robbers begin smashing the display cases with hammers;
- v. The robbers grab high-end watches and other items;
- vi. The robbers enter and exit the store within minutes;

10. The approximate value of the watches and other jewelry taken during the Robberies exceeds \$1,000,000.

THE JULY 1, 2013 ROBBERY IN ATLANTIC CITY, NEW JERSEY

11. The first of the Robberies occurred at approximately 8:40 p.m. on or about July 1, 2013 at Bernie Robbins Jewelers located in the Borgata Hotel and Casino in Atlantic City, New Jersey ("Bernie Robbins").

12. Based on meeting with an FBI agent ("Agent-1") who, along with the Atlantic City Police Department, was has been investigating the July 1, 2013 Robbery and has reviewed surveillance footage recorded by the store on that day, I have learned, among other things, the following:

a. At approximately 8:40 p.m., three robbers entered Bernie Robbins during business hours. Customers and several store employees were present. The robbers immediately began smashing display cases containing high end watches. The robbers fled with approximately \$200,000 in stolen high-end watches.

b. Based on reviewing surveillance video and stills recorded in the vicinity of the store, Agent-1 learned that the subjects appeared to enter and flee the scene through a fire stairwell that exited into a parking garage.

13. From reviewing a police laboratory report generated by the Atlantic City Police Department, whose evidence collection team responded to the scene of the robbery, I have learned that DNA was recovered from the broken glass in the display cases. The DNA was processed through a law enforcement DNA database and two matches were found: (1) one match was to the DNA of ALLEN WILLIAMS, the defendant; and (2) one match was to the DNA of TERRELL RATLIFF, the defendant.

14. At approximately 11:00 p.m. on or about January 30, 2014, with the assistance of the FBI, ALLEN WILLIAMS, the defendant, was arrested by the NYPD in Brooklyn, New York. After waiving his Miranda rights in writing, WILLIAMS agreed to speak with the FBI and NYPD. From speaking with WILLIAMS, I have learned, among other things, the following:

a. July 1, 2013 Robbery: (i) WILLIAMS participated in the July 1, 2013 Robbery; (ii) WILLIAMS and other participants in the July 1, 2013 Robbery drove through Manhattan on their way to the July 1, 2013 Robbery; (iii) Williams cut himself on one of the display cases during the July 1, 2013 Robbery; (iv) ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," the defendant, was involved in planning the July 1,

2013 Robbery; and (v) GRANT paid WILLIAMS \$1,500 for his participation in the robbery.

b. Other Robberies: (1) WILLIAMS and GRANT participated in the August 3, 2013 Robbery that occurred in Richmond, Virginia and which is detailed in paragraphs 16 through 18, below; (2) WILLIAMS lent a car that he drives (the "Williams Car") to GRANT for use in the January 19, 2014 Robbery that occurred in Cranford, New Jersey and which is detailed in paragraphs 22 through 24, below; (3) WILLIAMS drove GRANT and others to the January 30, 2014 Robbery of Cartier that occurred in Manhattan, New York and which is discussed in paragraphs 25 through 29, below.

THE AUGUST 3, 2013 ROBBERY IN RICHMOND, VIRGINIA

15. Another robbery identified as part of the Robbery Pattern occurred at approximately 2:45 p.m., on or about August 3, 2013, and was a robbery of Schwarzschild's Jewelers located on West Cary Street in Richmond, Virginia.

16. From speaking with a Detective from the Richmond City Police Department who has been investigating the August 3, 2013 Robbery and who has reviewed surveillance footage recorded by the store on that day, I have learned, among other things, that at approximately 2:45 p.m., three robbers entered Schwarzschild's Jewelry during business hours. Customers and several store employees were present. An additional robber stood outside the door and appeared to serve as a lookout. One subject immediately began smashing a display case containing high end watches and grabbed the watches. At the same time, another subject approached a female store employee ("Victim-1") and used a handheld stun gun to subdue Victim-1. The subjects fled with more than \$100,000 in high-end watches.

17. As detailed in paragraph 14, above, on or about January 30, 2014, with the assistance of the FBI, ALLEN WILLIAMS, the defendant, was arrested by the NYPD in Manhattan, New York. After waiving his Miranda rights in writing, WILLIAMS admitted to participating in the August 3, 2013 Robbery along with ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," the defendants, and others.

THE JANUARY 19, 2014 ROBBERY IN CRANFORD, NEW JERSEY

18. Another robbery identified as being part of the Robbery Pattern occurred at approximately 12:50 p.m., on or about January 19, 2014, and was a robbery of Martin Jewelers in Cranford, New Jersey.

19. From speaking with a Detective from the Cranford Police Department (the "Cranford Detective") who has been investigating the January 19, 2014 Robbery and who has reviewed surveillance footage recorded by the store on that day, I have learned, among other things, the following:

a. At approximately 12:51 p.m., three robbers entered Martin Jewelers during business hours. Customers and several store employees were present. One robber used a hammer to smash a display case in which high end watches were located. One of the robbers is seen on the surveillance video wearing a light gray sweatshirt (the "Gray Sweatshirt"). Moments later, the robbers fled with approximately \$36,000 in high-end watches.

b. An officer from the Cranford Police Department, who was on patrol near Martin Jewelers at the time of the robbery, heard a loud bang and observed an individual later identified as TYRONE DEHOYOS, a/k/a "Tyrone Cross," the defendant, exit Martin Jewelers wearing latex gloves on his hands. DEHOYOS initially fled from the officer and was subsequently arrested wearing the Gray Sweatshirt.

c. A police officer in a neighboring town in New Jersey notified the Cranford Police Department of the license plate number of a vehicle with out-of-state plates that he believed may have fled the scene following the January 19, 2014 Robbery. The Cranford Detective ran that license plate number through a law enforcement database and determined that the plate belonged to the Williams Car.

d. Based on a review of law enforcement databases, the Cranford Detective was able to determine that the Williams Car travelled from Manhattan, New York to New Jersey by way of the Holland Tunnel approximately one and a half hours prior to the January 19, 2014 Robbery.

20. From speaking with ALLEN WILLIAMS, the defendant, on or about January 30, 2014, as described in paragraph 15 above, I have learned that WILLIAMS lent the Williams Car to ROBERTO

GRANT, a/k/a "Roberto Cross," a/k/a "Berto," the defendant, to be used in the January 19, 2014 Robbery.

THE JANUARY 30, 2014 ROBBERY OF CARTIER
IN MANHATTAN, NEW YORK

21. Another robbery identified as being part of the Robbery Pattern occurred at approximately 12:30 p.m., on or about January 30, 2014, and was a robbery of Cartier in Manhattan, New York. I responded to the scene along with the NYPD Detective and other law enforcement officers.

22. From my review of surveillance footage recorded by Cartier during the January 30, 2014 Robbery, I have learned, among other things, the following:

a. At approximately 12:30 pm, five robbers entered Cartier through an entrance located on 52nd Street. Customers and several store employees were present. Numerous cases containing high end watches are located near that entrance. The robbers used hammers to smash a display case containing high end watches and grabbed several watches before fleeing the scene.

b. One of the robbers, an individual later identified as ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," the defendant, is seen on the surveillance video wearing a dark knit cap with a gray cuff and white logo (the "Knit Cap"), sunglasses, and a dark blue down jacket with a distinctive white patch on the left arm (the "Down Jacket").

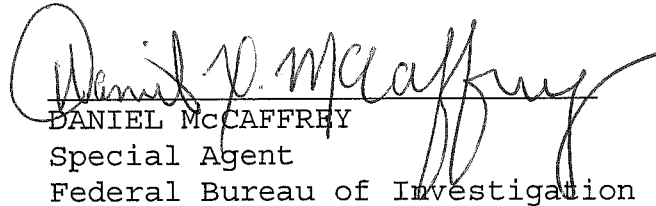
23. From speaking with an employee of Cartier who was present during the January 30, 2014 Robbery, I learned that the suspects fled with approximately \$700,000 in Cartier watches.

24. As detailed in paragraph 14, above, based on information provided by the FBI, ALLEN WILLIAMS and ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," the defendants, were arrested by NYPD officers in Brooklyn, New York in the Williams Car at approximately 11:00 p.m. on January 30, 2014. WILLIAMS and GRANT were both wearing Cartier watches whose models and appearance match the models and appearance of Cartier watches stolen in the January 30, 2014 Robbery. When GRANT was arrested, he was wearing what appear to be the Knit Cap and the Down Jacket worn by one of the robbers who perpetrated the January 30, 2014 Robbery.

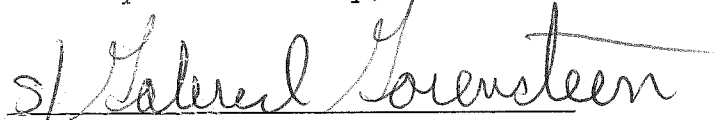
25. As detailed in paragraph 14, above, after waiving his Miranda rights in writing, WILLIAMS admitted to driving ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," to the January 30, 2014 Robbery.

26. I have been informed by representatives of the jewelry and watch stores discussed above that at least some of the watches and jewelry sold in their stores are manufactured outside of the respective states in which their stores are located, that some of the watches and jewelry sold in the stores are manufactured outside of the United States, and that at least some of the watches and jewelry sold in their stores are shipped to them from distribution facilities located outside of the respective states in which their stores are located.

WHEREFORE, the deponent respectfully requests that a warrant be issued for the arrest of ALLEN WILLIAMS, ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," TERRELL RATLIFF, and TYRONE DEHOYOS, a/k/a "Tyrone Cross," the defendants, and that they be arrested and imprisoned or bailed, as the case may be.


DANIEL McCAFFREY
Special Agent
Federal Bureau of Investigation

Sworn to before me this
5th day of February, 2014


HONORABLE GABRIEL W. GORENSTEIN
United States Magistrate Judge
Southern District of New York