
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
v. :
TAJ ELLIOT : Mag. No. 11-3049 (PS)

ORIGINAL FILED
MAR 17 2011
PATTY SHWARTZ
U.S. MAG. JUDGE

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 17, 2011, at Newark, New Jersey

HONORABLE PATTY SHWARTZ
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 TAJ ELLIOT, did knowingly agree and conspire with others to commit an offense against the United States, namely, theft of a motor vehicle by force, violence and by intimidation, contrary to Title 18, United States Code, Section 2119.

In violation of Title 18, United States Code, Section 371.

Count Two

On or about January 14, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant TAJ ELLIOT, 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.

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., one of the carjackers, later identified as GREGORY BROWN ("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. A second carjacker, later identified as TAJ ELLIOT ("defendant ELLIOT"), opened the front passenger side door of the Black Acura and yelled at BROWN to hurry and drive the carjacked vehicle away. Defendant ELLIOT along with a third individual were inside the Black Acura with 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 BROWN, who was already inside the vehicle, locked the doors and sped off. Victim M.S. observed defendant ELLIOT and the third carjacker inside the Black Acura, before it drove off behind the Altima.

6. Later that morning, at or about 9:00 a.m., 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. On or about January 18, 2011, six photographs, including a photograph of defendant ELLIOT, were shown sequentially to M.S., the victim of the Altima Carjacking. M.S. positively identified defendant ELLIOT as one of the carjackers.