

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ORIGINAL FILED

JAN 13 2011

UNITED STATES OF AMERICA

:

CRIMINAL COMPLAINT

CLAIRE C. CECCHI, U.S.M.J.

v.

:

JAHLIL THOMAS

:

Mag. No. 11-4026

I, Jason Carley, 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.

Jason Carley, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in presence,

January 13, 2011, at Newark, New Jersey

Claire C. Cecchi

HONORABLE CLAIRE C. CECCHI
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

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

On or about January 12, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant JAHLIL THOMAS, with the intent to cause death and serious bodily harm, knowingly took a motor vehicle, namely a 1997 Lincoln Continental, that had been transported, shipped and received in interstate and foreign commerce from the person and presence of another, namely S.Q., by force and violence and by intimidation.

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

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

On or about January 12, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant JAHLIL THOMAS, during and in relation to a crime of violence for which defendant may be prosecuted in a court of the United States, specifically the carjacking set forth in Count One, did knowingly and willfully use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

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

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

On or about January 12, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant JAHLIL THOMAS, with the intent to cause death and serious bodily harm, knowingly took a motor vehicle, namely a 2004 Dodge Durango, that had been transported, shipped and received in interstate and foreign commerce from the person and presence of another, namely J.M., by force and violence and by intimidation.

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

Count Four (Felon in Possession of a Firearm)

On or about January 12, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant JAHLIL THOMAS, having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court in the State of New Jersey, knowingly possessed in and affecting commerce a firearm, namely one Maverick Model 88, 12 gauge shotgun.

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

ATTACHMENT B

I, JASON CARLEY, 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 Wednesday, January 12, 2011, at or around 12:15 p.m., a black 1997 Lincoln Continental was stolen from victim S.Q. at gunpoint in Newark, Essex County, New Jersey (hereinafter the "Lincoln Carjacking"). S.Q. later provided a statement to Newark police officers regarding the Lincoln Carjacking. According to S.Q., two black males were walking down the street towards his vehicle as he was about to park his car. S.Q. parked the car and turned the engine off. He was attempting to get out of the car when both black males approached S.Q. One black male, wearing a hoodie that covered his head and a black snow suit, pointed a black shotgun at S.Q. and ordered him to get out of the car and to lie on the ground. The other black male wearing dark clothing stood on the passenger side of the vehicle. S.Q. complied. The two males jumped inside S.Q.'s 1997 Lincoln Continental and drove away.

2. On or about Wednesday, January 12, 2011, at or around 12:35 p.m., a 2004 burgundy Dodge Durango was stolen from victim J.M. at gunpoint in Newark, Essex County, New Jersey (hereinafter the "Durango Carjacking"). J.M. later provided a statement to Newark police officers regarding the Durango Carjacking. According to J.M., she noticed a black vehicle tailgating her car and pulled over to the right side of the street to allow the black vehicle to pass. The black vehicle stopped directly in front of J.M. Two black males exited the black vehicle. One of them pointed a long, black gun at J.M. and ordered her to get out of the car. J.M. got out of the car. The two individuals drove away in her 2004 burgundy Dodge Durango, leaving behind the black vehicle, with the car doors open, on the street. The black vehicle that was abandoned on the street was identified as the car that had been stolen from S.Q. in connection with the Lincoln Carjacking.

3. On or about Wednesday, January 12, 2011, at or around 1:30 p.m., law enforcement from the Newark Police Department were driving in an unmarked vehicle when they observed the Durango that had been reported stolen in connection with the Durango Carjacking traveling at a high rate of speed. They activated their lights and sirens and followed the Durango, which crashed into three vehicles. The Durango was stopped in the crash.

4. Two individuals from the Durango exited the vehicle and fled by foot. One of them, later identified as defendant JAHILIL THOMAS (hereinafter "defendant THOMAS"), was observed exiting the vehicle wearing all black clothing and in possession of a shotgun. Law enforcement observed defendant THOMAS fleeing the scene and dropping the shotgun. Pursuant to a brief foot chase, law enforcement apprehended defendant THOMAS and recovered the shotgun. At the time of his arrest, defendant THOMAS was wearing black snow pants and a

black jacket.

5. After defendant THOMAS was arrested, six photographs, including a photograph of defendant THOMAS, were shown sequentially to S.Q, the victim of the Lincoln Carjacking. S.Q. positively identified defendant THOMAS as the individual who pointed a shotgun at him and stole his car.

6. The firearm defendant THOMAS had in his possession was determined to be a Maverick Model 88, 12 gauge shotgun. This shotgun is a firearm within the meaning 18 U.S.C. Section 921(a)(3) and was manufactured in Texas.

7. A review of criminal history records conducted after defendant THOMAS' apprehension revealed that prior to January 12, 2011, defendant THOMAS was convicted of a felony offense punishable by a term of imprisonment greater than one year in a court in the State of New Jersey.

8. According to the New Jersey Criminal History Record, on or about December 20, 2007, defendant THOMAS was convicted in Essex County Superior Court of manufacture and distribution of a controlled and dangerous substance, in violation of N.J.S.A. 2C:35-5A(1), and possession of a handgun, in violation of N.J.S.A. 2C:39-5B, and sentenced to three years imprisonment. These crimes are felonies punishable by imprisonment in excess of one year.

9. S.Q.'s 1997 Lincoln Continental was determined to have been manufactured in Newark, Delaware and J.M.'s 2004 Dodge Durango was determined to have been manufactured in Wixom, Michigan.