

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

FILED

UNITED STATES OF AMERICA

Hon. Michael A. Shipp

MAR 24 2011

v.

Mag. No. 11-6040

AT 8:30M
CHAMBERS OF THE
HON. MICHAEL A. SHIPP,
U.S.M.J.

REGINALD H. WARE

a/k/a "Reginald Ware"

a/k/a "Ronell Wilson"

a/k/a "Kyiiis M. Justice"

a/k/a "Kyiiis Justice"

CRIMINAL COMPLAINT

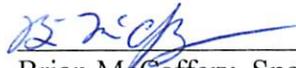
I, Brian McCaffery, being duly sworn, state that the following is true and correct to the best of my knowledge and belief.

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.



Brian McCaffery, Special Agent
Federal Bureau of Investigation

Sworn to before me and
subscribed in my presence,

March 24, 2010, at
Newark, New Jersey

HON. MICHAEL A. SHIPP
U.S. MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

On or about July 27, 2010, in Hudson County, in the District of New Jersey and elsewhere, defendant

REGINALD H. WARE
a/k/a "Reginald Ware"
a/k/a "Ronell Wilson"
a/k/a "Kyiis M. Justice"
a/k/a "Kyyiis Justice"

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, and did knowingly and willfully commit and threaten physical violence to persons and property in furtherance of a plan and purpose to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

On or about August 4, 2010, in Hudson County, in the District of New Jersey and elsewhere, defendant

REGINALD H. WARE
a/k/a "Reginald Ware"
a/k/a "Ronell Wilson"
a/k/a "Kyiis M. Justice"
a/k/a "Kyyiis Justice"

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, and did knowingly and willfully commit and threaten physical violence to persons and property in furtherance of a plan and purpose to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery.

In violation of Title 18, United States Code, Section 1951(a).

COUNT THREE

On or about October 12, 2010, in Hudson County, in the District of New Jersey and elsewhere, defendant

REGINALD H. WARE
a/k/a "Reginald Ware"
a/k/a "Ronell Wilson"
a/k/a "Kyiis M. Justice"
a/k/a "Kyyiis Justice"

knowingly and with the intent to cause serious bodily harm did take a motor vehicle that had been transported, shipped and received in interstate and foreign commerce, namely, a 2006 Honda Accord, from the person and presence of another by force, violence and intimidation.

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

COUNT FOUR

On or about October 14, 2010, in Hudson County, in the District of New Jersey and elsewhere, defendant

REGINALD H. WARE
a/k/a "Reginald Ware"
a/k/a "Ronell Wilson"
a/k/a "Kyiis M. Justice"
a/k/a "Kyyiis Justice"

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, and did knowingly and willfully commit and threaten physical violence to persons and property in furtherance of a plan and purpose to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery.

In violation of Title 18, United States Code, Section 1951(a).

COUNT FIVE

On or about October 16, 2010, in Hudson County, in the District of New Jersey and elsewhere, defendant

REGINALD H. WARE
a/k/a "Reginald Ware"
a/k/a "Ronell Wilson"
a/k/a "Kyiis M. Justice"
a/k/a "Kyyiis Justice"

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, and did knowingly and willfully commit and threaten physical violence to persons and property in furtherance of a plan and purpose to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery.

In violation of Title 18, United States Code, Section 1951(a).

ATTACHMENT B

I, Brian McCaffery, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Since this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. 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 July 27, 2010, an individual, later identified as defendant REGINALD H. WARE (“WARE”), robbed at gunpoint a pharmacy doing business as “The Wisdom Pharmacy” in Jersey City, Hudson County, New Jersey. WARE along with a separately-charged co-conspirator (“CO-CONSPIRATOR”) walked into the pharmacy and, while pointing firearms at victims, ordered them to lie on the floor facing down. The victims were threatened with death if they did not comply. After everyone in the pharmacy was secured at gunpoint, WARE seized certain controlled substances. He also seized cash from the pharmacy and from a customer. Parts of the robbery were captured on the pharmacy’s video surveillance system.

2. On or about August 4, 2010, an individual, later identified as defendant WARE, robbed at gunpoint a pharmacy doing business as “Welcome Pharmacy” in Jersey City, Hudson County, New Jersey. WARE and the CO-CONSPIRATOR entered the pharmacy, pointed their firearms at victims and ordered them to lie on the floor facing down. After everyone was secured at gunpoint, WARE seized certain controlled substances. WARE also seized cash and jewelry from victims.

3. On or about October 12, 2010, an individual, later identified as defendant WARE, carjacked a livery taxi driver. The taxi driver picked up WARE and the CO-CONSPIRATOR in Manhattan, New York, in a four-door, gray 2006 Honda Accord. After the livery taxi driver transported them to a specified location in Jersey City, Hudson County, New Jersey, WARE pulled out a firearm and demanded that the taxi driver give him everything in his pockets. The taxi driver complied and gave WARE his iPhone and wallet, which contained cash and his personal identification documents. The taxi driver was ordered out of the car, and he complied. WARE and the CO-CONSPIRATOR left in the car.

4. Approximately two days later, an individual, later identified as defendant WARE, used a gray, four-door 2006 Honda Accord (the “Honda Accord”) as the getaway vehicle in a third pharmacy robbery. On or about October 14, 2010, WARE and the CO-CONSPIRATOR entered a pharmacy doing business as “The Americas Pharmacy” in Union City, New Jersey. WARE used a firearm to threaten the victims inside the pharmacy and to seize certain controlled substances. WARE also seized cash from the pharmacy. Parts of the robbery were captured on the pharmacy’s video surveillance system. Additional surveillance videos from outside of the pharmacy revealed that WARE and the CO-CONSPIRATOR escaped in the Honda Accord.

5. Just two days later, on or about October 16, 2010, an individual, later identified as defendant WARE, and the CO-CONSPIRATOR entered a pharmacy doing business as “Carry Drugs” in Jersey City, Hudson County, New Jersey. Victims were held at gunpoint while WARE seized certain controlled substances. WARE also took cash from the pharmacy. Parts of the robbery were captured on the pharmacy’s video surveillance system. Additional surveillance videos from outside of the pharmacy revealed that WARE and the CO-CONSPIRATOR escaped in the Honda Accord.

7. At all times relevant to this Complaint, each of the above-mentioned pharmacies engaged in commerce, as defined in 18 U.S.C. § 1951(b)(3).