



**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Brian R. Martinotti
	:	
v.	:	Crim. No. 23- 81 (BRM)
	:	
RODNEY S. WILLIAMS and	:	18 U.S.C. § 1951(a)
SIOBHAN CASSANDRA CHANDLER	:	18 U.S.C. § 924(o)
	:	18 U.S.C. § 922(g)(1)
	:	18 U.S.C. §§ 924(c)(1)(A)(ii), (iii)
	:	18 U.S.C. § 2
	:	

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNT ONE

(Conspiracy to Commit Hobbs Act Robbery)

On or about November 14, 2021, in Hudson County, in the District of New Jersey, and elsewhere, the defendants,

**RODNEY S. WILLIAMS and
SIOBHAN CASSANDRA CHANDLER,**

did knowingly and intentionally conspire and agree with each other and others, known and unknown, to knowingly and willfully obstruct, delay, and affect commerce, and attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, through the commission of a robbery, and did commit and threaten physical violence to any person and property in furtherance thereof.

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

COUNT TWO

(Conspiracy to Use and Carry a Firearm During and in Relation to a Crime of Violence)

On or about November 14, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendants,

**RODNEY S. WILLIAMS and
SIOBHAN CASSANDRA CHANDLER,**

during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, specifically, the robbery offenses charged in Counts Five, Seven, and Nine of this Indictment, did knowingly and intentionally conspire and agree with each other and others, both known and unknown, to use and carry a firearm, contrary to Title 18, United States Code, Section 924(c).

In violation of Title 18, United States Code, Section 924(o).

COUNT THREE
(Hobbs Act Robbery)

On or about November 14, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

RODNEY S. WILLIAMS,

did knowingly and willfully obstruct, delay, and affect commerce, and attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, through the commission of a robbery, and did commit and threaten force, violence, and fear of injury to the person and property of another, namely, an employee of Store-1 in Jersey City, New Jersey, in furtherance thereof.

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

COUNT FOUR

(Using and Carrying a Firearm During and in Relation to a Crime of Violence)

On or about November 14, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

RODNEY S. WILLIAMS,

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 Hobbs Act Robbery, as charged in Count Three of this Indictment, did knowingly use and carry a firearm, namely, an SCCY CPX-3 .380 caliber handgun, bearing serial number A012375, which firearm was brandished.

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

COUNT FIVE

(Attempted Hobbs Act Robbery)

On or about November 14, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendants,

**RODNEY S. WILLIAMS and
SIOBHAN CASSANDRA CHANDLER,**

did knowingly and willfully obstruct, delay, and affect commerce, and attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, through the commission of a robbery, in that the defendants did unlawfully attempt to take and obtain property by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of another, an employee of Gas Station-1 in Jersey City, New Jersey, and did aid and abet the same.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

COUNT SIX
(Hobbs Act Robbery)

On or about November 14, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendants,

**RODNEY S. WILLIAMS and
SIOBHAN CASSANDRA CHANDLER,**

did knowingly and willfully obstruct, delay, and affect commerce, and attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, through the commission of a robbery, and did commit and threaten force, violence, and fear of injury to the person and property of another, namely, an employee of Store-2 in Jersey City, New Jersey, in furtherance thereof, and did aid and abet the same.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

COUNT SEVEN

(Using and Carrying a Firearm During and in Relation to a Crime of Violence)

On or about November 14, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendants,

**RODNEY S. WILLIAMS and
SIOBHAN CASSANDRA CHANDLER,**

during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, that is, the Hobbs Act Robbery, as charged in Count Six of this Indictment, did knowingly use and carry a firearm, namely, an SCCY CPX-3 .380 caliber handgun, bearing serial number A012375, which firearm was discharged, and did aid and abet the same.

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

COUNT EIGHT
(Hobbs Act Robbery)

On or about November 14, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendants,

**RODNEY S. WILLIAMS and
SIOBHAN CASSANDRA CHANDLER,**

did knowingly and willfully obstruct, delay, and affect commerce, and attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, through the commission of a robbery, and did commit and threaten force, violence, and fear of injury to the person and property of another, namely, an employee of Restaurant-1 in Jersey City, New Jersey, in furtherance thereof, and did aid and abet the same.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

COUNT NINE

(Using and Carrying a Firearm During and in Relation to a Crime of Violence)

On or about November 14, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendants,

**RODNEY S. WILLIAMS and
SIOBHAN CASSANDRA CHANDLER,**

during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, that is, the Hobbs Act Robbery, as charged in Count Eight of this Indictment, did knowingly use and carry a firearm, namely, an SCCY CPX-3 .380 caliber handgun, bearing serial number A012375, which firearm was discharged, and did aid and abet the same.

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

COUNT TEN

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about November 14, 2021, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

RODNEY S. WILLIAMS,

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, namely, an SCCY CPX-3 .380 caliber handgun, bearing serial number A012375, and the firearm was in and affecting commerce.

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

FORFEITURE ALLEGATION ONE

As a result of committing the Hobbs Act robbery offenses alleged in Counts One, Three, Five, Six, and Eight of this Indictment, the defendants,

**RODNEY S. WILLIAMS and
SIOBHAN CASSANDRA CHANDLER,**

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the said offenses, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses alleged in this Indictment.

FORFEITURE ALLEGATION TWO

As a result of committing the firearm offenses alleged in Counts Two, Four, Seven, and Ten of this Indictment, the defendants,

**RODNEY S. WILLIAMS and
SIOBHAN CASSANDRA CHANDLER,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearm and ammunition involved in or used in the commission of such offenses, including but not limited to one SCCY CPX-3 .380 caliber handgun, bearing serial number A012375.

Substitute Assets Provision
(Applicable to All Forfeiture Allegations)

If any of the property described above, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

A TRUE BILL, [REDACTED]

[REDACTED] FOREPERSON

Philip R. Sellinger

PHILIP R. SELLINGER
United States Attorney

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District of New Jersey**

UNITED STATES OF AMERICA

v.

**RODNEY S. WILLIAMS, and
SIOBHAN CASSANDRA CHANDLER**

**INDICTMENT
FOR**

**18 U.S.C. § 1951(a)
18 U.S.C. § 924(o)
18 U.S.C. § 922(g)(1)
18 U.S.C. §§ 924(c)(1)(A)(ii), (iii)
18 U.S.C. § 2**

~~A True Bill~~

~~Foreperson~~

PHILIP R. SELLINGER
*UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY*

SHONTAE D. GRAY
ASSISTANT U.S. ATTORNEY
NEWARK, NJ
973-297-2071
