

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

25mj135

UNITED STATES OF AMERICA

v.

BHUPINDERJIT SINGH,
a/k/a "Bhupinder Jit Singh,"
a/k/a "Prince,"

ELIJAIH ROMAN,
a/k/a "Swervy,"

COREY HALL,

ERIK SUAREZ,

DIVYA KUMARI,

Defendants.

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 1951,
924(c)(1)(A), and 2

COUNTY OF OFFENSE:
ORANGE

SOUTHERN DISTRICT OF NEW YORK, ss.:

DANE WAKEFIELD, being duly sworn, deposes and says that he is a Task Force Officer with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE
(Conspiracy to Commit Hobbs Act Robbery)

1. Between in or about November 2024 and on or about December 1, 2024, in the Southern District of New York and elsewhere, BHUPINDERJIT SINGH, a/k/a "Bhupinder Jit Singh," a/k/a "Prince," ELIJAIH ROMAN, a/k/a "Swervy," COREY HALL, ERIK SUAREZ, and DIVYA KUMARI, the defendants, and others known and unknown, knowingly combined, conspired, confederated, and agreed 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, SINGH, ROMAN, HALL, SUAREZ, and KUMARI agreed to rob the home of a business owner in the vicinity of the Town of Wallkill, New York, which home contained U.S. currency the business owner would have used to purchase items that move in interstate commerce for his stores.

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

COUNT TWO
(Hobbs Act Robbery)

2. On or about December 1, 2024, in the Southern District of New York and elsewhere, BHUPINDERJIT SINGH, a/k/a “Bhupinder Jit Singh,” a/k/a “Prince,” ELIJAIH ROMAN, a/k/a “Swerv,” COREY HALL, ERIK SUAREZ, and DIVYA KUMARI, the defendants, knowingly committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby obstructed, delayed, and affected 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), and aided and abetted the same, to wit, SINGH, ROMAN, HALL, SUAREZ, and KUMARI robbed the home of a business owner in the vicinity of the Town of Wallkill, New York and stole U.S. currency that the business owner would have used to purchase items that move in interstate commerce for his stores.

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

COUNT THREE
(Firearms Use, Carrying, and Possession)

3. On or about December 1, 2024, in the Southern District of New York and elsewhere, BHUPINDERJIT SINGH, a/k/a “Bhupinder Jit Singh,” a/k/a “Prince,” ELIJAIH ROMAN, a/k/a “Swerv,” COREY HALL, and ERIK SUAREZ, the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Two of this Complaint, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm, which was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and (ii), and 2.)

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

4. I am a Task Force Officer with the FBI, and I have been personally involved in the investigation of this matter. This affidavit is based in part upon my training and experience, my conversations with other law enforcement officers and others, including about search warrant returns and cellphone location data, and my examination of correspondence, reports, video footage, and other 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 my investigation. Where the contents of documents or recordings and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. This Complaint concerns a gun-point home invasion robbery perpetrated by at least five people on or about December 1, 2024, in the vicinity of the Town of Wallkill, New York (the “Robbery”). As detailed below, the participants in the robbery include BHUPINDERJIT SINGH, a/k/a “Bhupinder Jit Singh,” a/k/a “Prince,” ELIJAIH ROMAN, a/k/a “Swerv,” COREY HALL, ERIK SUAREZ, and DIVYA KUMARI, the defendants. SINGH, ROMAN, HALL, and SUAREZ entered a house and stole cash and other valuables while holding the homeowners (“Victim-1” and Victim-1’s wife) and their children at gunpoint. KUMARI acted as a lookout and driver. At least

a portion of the money that was stolen was going to be used by Victim-1 to pay vendors for various items that move in interstate commerce for Victim-1's businesses.

The Robbers' Phones and Cars

6. During the period relevant to this Complaint, BHUPINDERJIT SINGH, a/k/a "Bhupinder Jit Singh," a/k/a "Prince," the defendant, used a cellphone assigned a call number ending x6689, which is serviced by T-Mobile US, Inc. (the "Singh Cellphone"). The Singh Cellphone was dropped at Victim-1's house during the Robbery, and law enforcement officers are in the process of searching its contents pursuant to a search warrant.¹ I believe that SINGH was the user of the Singh Cellphone based on my review of records and evidence seized from the Singh Cellphone itself, including the following:

a. The Singh Cellphone contains various photographs of records, including insurance and court documents, bearing SINGH's name.

b. There are numerous photographs on the Singh Cellphone of a man with a goatee who resembles SINGH. *Compare* Figure 1 (photograph seized from the Singh Cellphone), *with* Figure 2 (photograph of SINGH from law enforcement records).



Figure 1



Figure 2

7. During the period relevant to this Complaint, ELIJAIH ROMAN, a/k/a "Swerv," the defendant, used a cellphone assigned a call number ending x8554, which is serviced by Verizon Wireless (the "Roman Cellphone"). I believe that ROMAN was the user of the Roman Cellphone based on my review of various records, including the following:

a. Law enforcement officers are in the process of reviewing, pursuant to a search warrant, the contents of an Apple Inc. account to which the Roman Cellphone is connected. There are numerous photographs saved to that Apple account of a man who resembles ROMAN. *Compare* Figure 3 (photograph seized from Apple account), *with* Figure 4 (photograph from ROMAN's criminal history records). Moreover, the Apple

¹ Approximately a day after the Robbery, on or about December 2, 2024, Victim-1 gave a red Apple iPhone (the Singh Cellphone) to the Town of Wallkill Police Department, and said, in substance and in part, that the cellphone was found in the basement of his house and did not belong to him or any other member of his household.

account's user is listed as living at an address that matches the address that ROMAN has on file with the New York State Department of Motor Vehicles ("DMV").²



Figure 3



Figure 4

b. According to New York City Police Department records, ROMAN was arrested in or about August 2024. While being processed following that arrest, a Prisoner Pedigree Card was completed for ROMAN, which lists his phone number as the number associated with the Roman Cellphone.³

8. During the period relevant to this Complaint, COREY HALL, the defendant, used a cellphone assigned a call number ending x0068, which is serviced by T-Mobile (the "Hall Cellphone"). I believe that HALL was the user of the Hall Cellphone based on my review of various records, including the following:

a. T-Mobile's records indicate that the Hall Cellphone's subscriber is named "Corey L Hall." Moreover, in response to grand jury subpoenas, each of Block, Inc.,⁴ Google LLC, and PayPal, Inc. produced records reflecting that the Hall Cellphone is connected to accounts whose user is named "Corey Hall."

b. Law enforcement officers are in the process of reviewing, pursuant to a search warrant, the contents of an Apple Inc. account to which the Hall Cellphone is connected. That Apple account is registered in the name of "Corey Hall," and lists "Corey Hall" as living at an address that matches the address HALL has on file with the DMV.

c. Among the DMV's records related to HALL is an application to renew a license submitted in HALL's name in or about 2023. That application, which bears

² The address on file with the DMV lists a specific apartment unit. Although the address associated with the Apple account matches the street address reflected in DMV records, it does not specify a particular apartment.

³ Although I have not spoken to the officer who completed the Prisoner Pedigree Card for ELIJAH ROMAN, a/k/a "Swerv," the defendant, I have spoken to another law enforcement officer who advised me that standard protocol for completing Prisoner Pedigree Cards is to use the information provided by the arrestee. Accordingly, I believe that the phone number on the card was supplied by ROMAN.

⁴ Block operates Cash App, which is a financial services platform that allows users to send money to one another using, among other tools, a mobile application. See <https://cash.app/> (last accessed on or about January 14, 2025).

HALL's signature certifying the accuracy of the information, lists the Hall Cellphone's number as belonging to HALL.

d. The Hall Cellphone's number is saved in the Singh Cellphone's contacts under the names "Corey Hall" and "Cory" [sic].

9. During the period relevant to this Complaint, ERIK SUAREZ, the defendant, used a cellphone assigned a call number ending x4767, which is serviced by T-Mobile (the "Suarez Cellphone"). I believe that SUAREZ was the user of the Suarez Cellphone based on my review of various records, including the following:

a. In response to grand jury subpoenas, each of Block, Google, and PayPal produced records reflecting that the Suarez Cellphone is connected to accounts whose user is named "Erik Suarez."

b. Law enforcement officers are in the process of reviewing, pursuant to a search warrant, the contents of an Apple Inc. account to which the Suarez Cellphone is connected. That Apple account is registered in the name of "Erik Suarez," and lists "Erik Suarez" as living at an address that matches the address SUAREZ has on file with the DMV.

10. During the period relevant to this Complaint, DIVYA KUMARI, the defendant, used a cellphone assigned a call number ending x1638, which is serviced by T-Mobile (the "Kumari Cellphone"). I believe that KUMARI was the user of the Kumari Cellphone based on my review of various records, including the following:

a. In response to grand jury subpoenas, Apple, Google, and PayPal produced records reflecting that the Kumari Cellphone is connected to accounts whose user is named "Divya Kumari."

b. There are numerous photographs in a message thread between the Singh Cellphone and the Kumari Cellphone that include a woman who resembles KUMARI. *Compare* Figure 5 (photograph seized from the Singh Cellphone), *with* Figure 6 (photograph of KUMARI from law enforcement records).

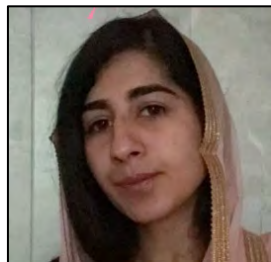


Figure 5



Figure 6

c. In the Singh Cellphone's contact list, the Kumari Cellphone's number is associated with, among other names, "Divya" and "Divya Kumari."

11. As detailed below, *infra* ¶¶ 17–19, 22, BHUPINDERJIT SINGH, a/k/a “Bhupinder Jit Singh,” a/k/a “Prince,” ELIJAH ROMAN, a/k/a “Swerv,” COREY HALL, ERIK SUAREZ, and DIVYA KUMARI, the defendants, traveled to the location of the Robbery in two cars, a black-colored BMW associated with a Vehicle Identification Number (“VIN”) ending in x9592 (the “Black BMW”),⁵ and a silver/gray-colored BMW associated with a VIN number ending in x9892 (the “Silver BMW”). I believe that KUMARI has access to the Black BMW, while HALL has access to the Silver BMW, based on the following:

a. According to DMV records, the Black BMW is registered to someone whose last name is “Kumari,” and who lives at an address in the vicinity of Massapequa, New York.⁶ That same Massapequa address is listed as associated with the owner of various Apple and PayPal accounts connected to the Kumari Cellphone and registered in the name “Divya Kumari.”

b. During a review of the Apple account connected to the Hall Cellphone, *see supra* ¶ 8(b), law enforcement officers identified at least one photograph of a car that resembles the Silver BMW, including the number on the license plate tag that is visible in the photograph. Moreover, on or about January 1, 2025, law enforcement officers saw the Silver BMW at least twice over the course of the day, once parked in front of the address that HALL has on file with the DMV, and once in the vicinity of an intersection in another part of Queens, New York. Based on discussions with another law enforcement officer, I have learned that location information for the Hall Cellphone, which T-Mobile provided pursuant to a search warrant, indicated that the Hall Cellphone was in the same vicinity as the Silver BMW on both occasions.

Late November 2024 - Planning the Robbery

12. Based on a review of license plate reader camera (“LPR”) data, evidence seized from the Singh Cellphone, and cellphone location information, I believe that on or about November 29, 2024, BHUPINDERJIT SINGH, a/k/a “Bhupinder Jit Singh,” a/k/a “Prince,” and DIVYA KUMARI, the defendants, drove the Black BMW to the vicinity of Orange County, New York, to case Victim-1’s home in advance of the Robbery.

a. At approximately 3:18 p.m., on or about November 29, 2024, an LPR in the vicinity of Monroe, New York, recorded the Black BMW. Monroe is approximately a 25-minute drive from Victim-1’s house, and approximately 90 miles from the Black BMW’s registered address in Massapequa, New York.

⁵ According to a database reviewed by law enforcement officers, at the time of the Robbery, the VIN number of the Black BMW was associated with a temporary New Jersey license plate. As described below, *infra* ¶¶ 12(a), 17(a), it was that temporary New Jersey plate that was captured by various license plate reader cameras on or about November 29, 2024 and December 1, 2024, the day of the Robbery. However, DMV records indicate that in or about late December 2024, a New York license plate was registered for the Black BMW. During surveillance in or about early January 2025, law enforcement officers confirmed that the Black BMW now has a New York license plate.

⁶ According to a database reviewed by law enforcement officers, it appears that the registered owner of the Black BMW is related to DIVYA KUMARI, the defendant.

b. There is a video seized from the Singh Cellphone (the “Video”) that, according to the file’s metadata, was created at approximately 3:39 p.m., on or about November 29, 2024. The Video appears to show the person holding the camera driving through Victim-1’s neighborhood, including recording the house across the street from Victim-1’s home. Moreover, it appears that the person taking the Video was in the passenger seat of the car, meaning that a second person was driving the car at that time. At one point during the Video, the camera pans over the window of the car showing what appears to be a sticker of the BMW logo. *See* Figure 7.

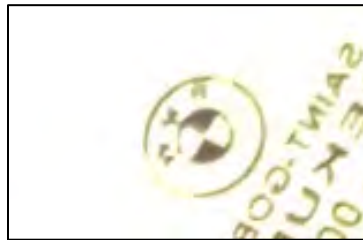


Figure 7

c. Based on conversations with another law enforcement officer, I have learned that location information produced by T-Mobile indicates that the Singh Cellphone and Kumari Cellphone were in the vicinity of Victim-1’s house at approximately 3:39 p.m., on or about November 29, 2024—around the same time that the Video was recorded.

13. The following day, on or about November 30, 2024, BHUPINDERJIT SINGH, a/k/a “Bhupinder Jit Singh,” a/k/a “Prince,” the defendant, and DIVYA KUMARI, the defendant, had a conversation about money.

a. KUMARI messaged the Singh Cellphone and asked about getting a “Zelle.”⁷ SINGH responded, “Ni [*sic*], no one wants they banks involved.” *See* Figure 8. A few minutes later, SINGH wrote, “But not amount you want till tomorrow,” followed by an emoji that appears to be of crossed fingers. *See* Figure 9. Given SINGH’s reference to having a larger amount of money the following day (when the Robbery would ultimately take place), I believe that this conversation concerned money that SINGH and KUMARI expected to earn from the Robbery.

⁷ Zelle is an electronic payment service that allows users to send money to someone else’s bank account. *See* <https://www.zellepay.com/> (last accessed on or about January 14, 2025).

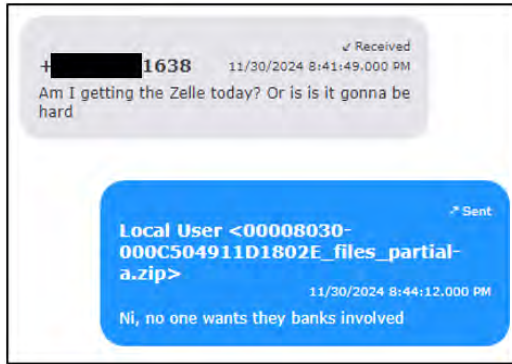


Figure 8

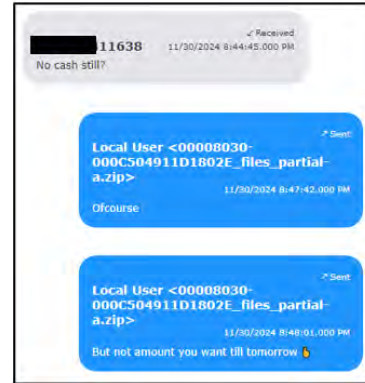


Figure 9

December 1, 2024 - Before the Robbery

14. In the early morning hours of on or about December 1, 2024, BHUPINDERJIT SINGH, a/k/a “Bhupinder Jit Singh,” a/k/a “Prince,” the defendant, sent messages to both ELIJAIH ROMAN, a/k/a “Swerv,” and COREY HALL, the defendants, in which SINGH confirmed a meeting time for later that day. Specifically, I have reviewed messages seized from the Singh Cellphone showing, among other things, the following:

- a. At approximately 12:48 a.m.,⁸ SINGH messaged the Roman Cellphone, telling ROMAN, “Be ready 10:30.” ROMAN replied, “I got you.”
- b. About 10 minutes later, at approximately 12:59 a.m., SINGH messaged the Hall Cellphone, “10:30,” followed by “Make sure you in the front.” HALL responded, “Copy.”

15. Later that morning, between approximately 8:40 a.m. and approximately 10:15 a.m., BHUPINDERJIT SINGH, a/k/a “Bhupinder Jit Singh,” a/k/a “Prince,” the defendant, exchanged messages with each of ELIJAIH ROMAN, a/k/a “Swerv,” COREY HALL, ERIK SUAREZ, and DIVYA KUMARI, the defendants, to coordinate in advance of the Robbery. Specifically, I have reviewed messages seized from the Singh Cellphone showing, among other things, the following.

- a. At approximately 8:41 a.m., SINGH messaged the Roman Cellphone, “Get ready,” to which ROMAN responded, “Ready rn.” Shortly thereafter, ROMAN sent SINGH a photograph of a man resembling ROMAN wearing a dark-colored jacket or sweatshirt and a dark-colored glove.⁹ See Figure 10. As explained below, this outfit

⁸ The cellphone extraction of the Singh Cellphone is in UTC time, which I know to be five hours ahead of EST. When this affidavit refers to times of messages in the Singh Cellphone, it refers to the time in EST format. Screenshots of messages seized from the Singh Cellphone, however, reflect UTC time.

⁹ Although I have not personally met ELIJAIH ROMAN, a/k/a “Swerv,” the defendant, I have reviewed a photograph of him in his criminal history records. See Figure 4 (above). I have also reviewed photographs seized from an Apple Inc. account associated with the Roman Cellphone pursuant to a search warrant. See Figure 3 (above). Based on a comparison of those photographs to Figure 10, I believe that the man in Figure 10 resembles ROMAN.

resembles the description of what the perpetrators were wearing during the Robbery later that day. In response, SINGH told ROMAN to “get the toy for yourself,” which, based on context, I believe refers to a weapon for use during the Robbery.



Figure 10

b. Around the same time, SINGH messaged the Hall Cellphone, “10:30,” to which HALL responded, “Copy.” A few minutes later, SINGH appears to have changed his mind, telling HALL, “Let’s go @ 10.”

c. SINGH also wrote to SUAREZ that morning at approximately 8:45 a.m., telling him, “Get ready,” and then followed by screenshots of SINGH’s conversations with ROMAN and HALL. In response, SUAREZ asked, “Who that wtf,” to which SINGH replied, “Swervooo” and “Big herbo.” About 45 minutes later, SINGH sent several messages to SUAREZ that appeared to concern various tools they would need for the robbery, including “[t]ies and tape” (*i.e.*, zip ties and duct tape). *See* Figure 11.

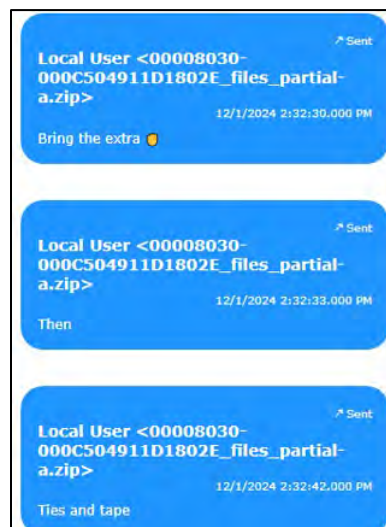


Figure 11

d. At approximately 9:15 a.m., KUMARI messaged SINGH to let him know that she was “[o]n [her] way!” Around thirty minutes later, KUMARI told SINGH that she

would get there in about “5 mins.” SINGH responded, “Born ready,” to which KUMARI replied, “Me too” and “That why we gottogether [*sic*].”

e. Shortly after that exchange, HALL and ROMAN sent messages to the Singh Cellphone indicating that the two men arrived at the meeting location. Specifically, at approximately 9:59 a.m., HALL messaged, “Outside.” A few minutes later, at approximately 10:15 a.m., ROMAN wrote to SINGH letting him know that he was “here.”

f. Based on conversations with another law enforcement officer, I have learned that location data for the Singh Cellphone, Roman, Cellphone, Hall Cellphone, and Kumari Cellphone, which was produced pursuant to search warrants, indicates that those cellphones were in the vicinity of an address in South Ozone Park, New York (the “Singh Residence”), around 10:19 a.m., on or about December 1, 2024. I believe that SINGH lives at the Singh Residence. Specifically, according to DMV and New York City Taxi and Limousine Commission records produced pursuant to grand jury subpoenas, the Singh Residence is associated with SINGH. Moreover, Apple Inc. records indicate that two Apple accounts connected to the Singh Cellphone belong to a user who lives at the Singh Residence. Finally, evidence seized from the Singh Cellphone indicates that the cellphone’s user (*i.e.*, SINGH) lives at the Singh Residence, including photographs of a property that resembles the Singh Residence and photographs of records bearing SINGH’s name and listing his address as the Singh Residence.

16. Thereafter, ERIK SUAREZ, the defendant, appears to have met the group. Specifically, around 10:37 a.m., SUAREZ sent the Singh Cellphone a message reading, “Wya,” which I believe is a shorthand for “where you at?” A few minutes later, BHUPINDERJIT SINGH, a/k/a “Bhupinder Jit Singh,” a/k/a “Prince,” the defendant, responded with, among other messages, “Grey” and “Bm,” an apparent reference to the silver/gray BMW that was one of the cars driven to the scene of the Robbery (*i.e.*, the Silver BMW).

17. Based on cellphone location information, messages seized from the Singh Cellphone, and LPRs, I believe that the group then headed north from the vicinity of Queens, New York, towards Victim-1’s house in the vicinity of Orange County, New York.

a. At approximately 12:06 p.m., an LPR captured the Black BMW traveling in the vicinity of Monroe, New York. Based on discussions with another law enforcement officer, I have learned that location information for the Roman Cellphone, Suarez Cellphone, and Kumari Cellphone indicates that all three phones were in the vicinity of the LPR around that same time.

b. Based on several text messages exchanged between the group, I believe that the members were split up between at least two cars. Specifically, at approximately 12:06 p.m., BHUPINDERJIT SINGH, a/k/a “Bhupinder Jit Singh,” a/k/a “Prince,” the defendant, messaged the Suarez Cellphone, “Gas station” and “Follow.” About an hour later, at approximately 1:08 p.m., SINGH sent the Hall Cellphone a message reading, “Use Waze to drive to Mechanicstown” (Mechanicstown, New York is about an 8-minute drive from Victim-1’s house), followed by a URL link to the Waze website. Around two minutes later, SINGH sent the Suarez Cellphone what appears to be a photograph of the house across the street from Victim-1’s home, taken from Google Maps or another similar

mapping program. Then, at approximately 2:34 p.m., SINGH sent the Hall Cellphone a message saying that SINGH was “using Waze to drive to [Victim-1’s address], arriving at 2:39 PM.” Given those messages, it appears that SINGH was in a different car from COREY HALL and ERIK SUAREZ, the defendants, but that they were all travelling towards Victim-1’s home.

18. At approximately 2:49 p.m., BHUPINDERJIT SINGH, a/k/a “Bhupinder Jit Singh,” a/k/a “Prince,” ELIJAH ROMAN, a/k/a “Swerv,” COREY HALL, ERIK SUAREZ, and DIVYA KUMARI, the defendants, stopped off at a restaurant in the vicinity of Middletown, New York (the “Restaurant”), and stayed there until about 4:32 p.m. The Restaurant is approximately 2 miles from Victim-1’s house. Specifically, based on a review of surveillance footage, toll records, cellphone location data, and a receipt from the Restaurant, I have learned the following:

a. Toll records for the Kumari Cellphone show that KUMARI called the Restaurant at approximately 2:40 p.m., and then again approximately nine minutes later. Around the same time as that second call, the Restaurant’s surveillance cameras captured cars resembling the Black BMW and Silver BMW arriving at the Restaurant together and parking. *See* Figures 12 and 13.



Figure 12



Figure 13

b. A few minutes later, at approximately 2:53 p.m., a man and woman resembling SINGH and KUMARI were seen getting out of the black car and going into the Restaurant. *See* Figure 14. According to a receipt provided by the Restaurant, a customer

named “D,” using the Kumari Cellphone’s phone number, ordered food at the Restaurant around 2:55 p.m. that afternoon. *See* Figure 15.



Figure 14



Figure 15

c. At approximately 3:03 p.m., the man resembling SINGH left the Restaurant carrying what appeared to be pizza boxes, and walked over to the car that resembles the Silver BMW. *See* Figure 16. About ten minutes later, KUMARI sent the Singh Cellphone several messages in which she appeared to be talking about pizza, and asked SINGH whether he was “eating with” his “friends.” *See* Figure 17.

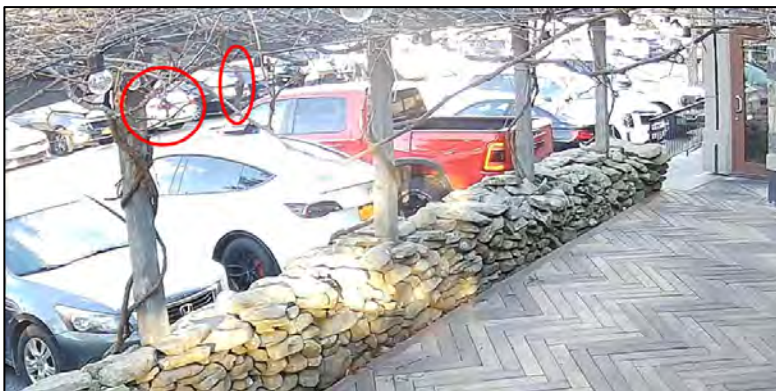


Figure 16

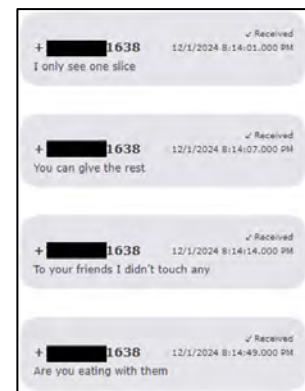


Figure 17

d. Both cars remained at the Restaurant until about 4:32 p.m., at which point they were captured on surveillance camera leaving the parking lot together.

e. I have learned that location data for the Kumari Cellphone, Hall Cellphone, and Suarez Cellphone indicates that the cellphones were all in the vicinity of the Restaurant between approximately 2:50 p.m. and approximately 4:30 p.m. Likewise, records produced by T-Mobile and Verizon Wireless show that, between approximately 3:20 p.m. and

3:45 p.m., the Singh Cellphone and Roman Cellphone each connected to a cell tower in the vicinity of the Restaurant.

19. Approximately seven minutes after the black and silver cars left the Restaurant, two cars that appear to resemble the Black BMW and Silver BMW were captured on surveillance footage driving by a gas station in the vicinity of Industrial Drive in Middletown, New York. *See* Figure 18. Location data places the Hall Cellphone, Suarez Cellphone, and Kumari Cellphone in the vicinity of that gas station around the same time. Like the Restaurant, this gas station is just a few miles from Victim-1's house.



Figure 18

December 1, 2024 – The Robbery

20. Based on my discussions with other law enforcement officers and a review of law enforcement reports and records, I have learned that law enforcement spoke to Victim-1 and Victim-1's wife, who stated, in substance and in part, the following:

a. Around 5:45 p.m. on or about December 1, 2024, Victim-1 and his daughter, who is approximately 10 years' old, arrived at their house. As Victim-1 step out of his vehicle, Victim-1 saw a car that he did not recognize sitting near his house with its headlights on.

b. A man ("Robber-1") got out of that car, approached Victim-1, pulled out what Victim-1 believed was a gun, and told Victim-1 to keep walking. Robber-1 was accompanied by another man ("Robber-2") who was armed with a metal rod. As Victim-1, Victim-1's daughter, Robber-1, and Robber-2 walked towards Victim-1's house, two additional men ("Robber-3" and "Robber-4") joined the group. The robbers were wearing, among other items, glasses or ski masks, winter gloves, and hoodies or jackets.

c. Below is a screenshot from a video taken by a surveillance camera installed near the entrance to Victim-1's house, showing the four robbers, Victim-1, and Victim-1's daughter walking up to the home's front door. *See* Figure 19. The numbers above the robbers correspond to the names for the robbers used in this affidavit (e.g., Robber-1 is the man to the far right of the image with the "1" over his head).



Figure 19

d. At the time the four robbers entered Victim-1's home, Victim-1's wife was sitting with the couple's other three children, who ranged from approximately age two to age nine. One of the robbers approached Victim-1's wife from behind, and grabbed her, putting his hand over her mouth.

e. The robbers then zip tied the hands and legs of both Victim-1 and his wife and placed the couple on a couch next to their children.¹⁰ Thereafter, three of the four robbers began to search throughout the house, while the fourth robber remained with Victim-1 and his family. As that was going on, Victim-1 heard sounds that he believed were items being broken throughout the house.

f. By this point, Robber-1 had passed off what appeared to be a small black pistol to the robber who remained with Victim-1's family. That robbery held the black pistol so that the family could see it and demanded that Victim-1 give the robbers money. One of Victim-1's daughters then begged the robbers to not hurt her parents and indicated that she would tell them where the family stored their valuables. Certain of the robbers then took Victim-1's daughter to the house's master bedroom where there was a safe, but Victim-1's daughter was unable to get the safe open. The robbers then took Victim-1's daughter back to her parents and forced Victim-1's wife to come with them instead. Once in the bedroom, Victim-1's wife opened the safe and watched as the robbers removed from it, among other items, numerous pieces of jewelry and approximately \$10,000 in U.S. currency.

g. At approximately 5:54 p.m., around 10 minutes after the robbers entered Victim-1's house, DIVYA KUMARI, the defendant, messaged the Singh Cellphone, saying, "I'm in front of your house[.] Everything is so quiet." Based on my training and experience in investigating other robbery and home invasion cases, I know that people

¹⁰ The initial police report lists only three children as having been inside the house during the Robbery. However, based on information that Victim-1 and Victim-1's wife provided to federal law enforcement officers, I understand that all four of the couple's children were present.

engaged in these sorts of crimes will often have an accomplice waiting nearby watching the scene so that the accomplice can alert the other robbers of any trouble or law enforcement activity. Based on the timing of this message and the cellphone location information described below, *see infra* ¶ 20(h), I submit that KUMARI was waiting in the vicinity of Victim-1's house to act as a lookout, while the four men robbing the house (*i.e.*, Robbers-1 through Robber-4) were, in no particular order, BHUPINDERJIT SINGH, a/k/a "Bhupinder Jit Singh," a/k/a "Prince," ELIJAIH ROMAN, a/k/a "Swerv," COREY HALL, and ERIK SUAREZ, the defendants.

h. Eventually, SINGH, ROMAN, HALL, and SUAREZ left Victim-1's house with various stolen items, including the jewelry and money from the safe. Based on information provided by Victim-1, as well as a review of surveillance footage captured by the camera installed at Victim-1's house, it appears that the Robbery lasted approximately 15 minutes, and the four robbers left the house around 6 p.m.

i. Based on conversations with another law enforcement officer, I have learned that location data indicates that the Singh Cellphone, Roman Cellphone, Hall Cellphone, Suarez Cellphone, and Kumari Cellphone were all in the vicinity of Victim-1's house around the time that the Robbery was taking place.

21. Through interviews of Victim-1, as well as discussions with other law enforcement officers who have spoken with Victim-1, I know that Victim-1 has further stated, in substance and in part, the following:

a. Victim-1 owns multiple stores in the vicinity of Orange County, New York, which sell various goods, including beer, soda, and snacks.

b. At least a portion of the U.S. currency that the robbers stole from Victim-1's safe was money that Victim-1 was going to use to pay his businesses' vendors for various items for his stores. Those vendors included, among others, soft drink suppliers, beer distributors, and a gas provider. I have seen invoices that certain of those vendors have provided to law enforcement officers, which show numerous sales to Victim-1's stores.

c. Based on my training, experience, and personal knowledge, I submit that there is probable cause to conclude that at least some of those items were transported in or otherwise affect interstate commerce.

December 1, 2024 – Returning to New York City Following the Robbery

22. Cellphone location data, LPRs, and messages seized from the Singh Cellphone indicate that, following the end of the Robbery around 6 p.m., BHUPINDERJIT SINGH, a/k/a "Bhupinder Jit Singh," a/k/a "Prince," ELIJAIH ROMAN, a/k/a "Swerv," COREY HALL, ERIK SUAREZ, and DIVYA KUMARI, the defendants, drove the Black BMW and Silver BMW back to the vicinity of the Singh Residence, approximately 80 miles from Victim-1's house.

a. At approximately 6:20 p.m., HALL messaged the Singh Cellphone, “Take the plate tape off the plate stop.”¹¹ Based on my training and experience, I know that criminals will sometimes remove, obscure, or modify a license plate on a car that they take to commit a crime to, among other things, avoid a witness seeing the plate and providing that license plate number to law enforcement as a means of identifying or tracking the criminals.

b. Based on discussions with another law enforcement officer, I have learned that location data indicates that between approximately 6:24 p.m. and approximately 6:34 p.m., the Hall Cellphone, Suarez Cellphone, and Kumari Cellphone were all in the vicinity of a shopping center around Woodbury, New York.

c. Then, at approximately 6:51 p.m., an LPR in the vicinity of Woodbury, New York captured the Silver BMW while it was driving. This LPR is approximately 23 miles from Victim-1’s house. At approximately that same time, around 6:51 p.m., I have learned that location data placed the Suarez Cellphone and Kumari Cellphone in the vicinity of the intersection between Route 9W and Route 293, which is approximately 7 miles from where the LPR captured the Silver BMW.

d. Between approximately 9:00 p.m. and 9:15 p.m., location information indicates that the Roman Cellphone, Hall Cellphone, Suarez Cellphone, and Kumari Cellphone were all in the vicinity of the Singh Residence. Accordingly, it appears that SINGH, ROMAN, HALL, SUAREZ, and KUMARI met at the Singh Residence once they arrived back in New York City following the Robbery.¹²

Access to Firearms

23. Based on evidence obtained through the execution of search warrants, as well as a review of criminal history records, I have learned that BHUPINDERJIT SINGH, a/k/a “Bhupinder Jit Singh,” a/k/a “Prince,” ELIJAH ROMAN, a/k/a “Swerv,” and COREY HALL, the defendants, appear to have access to firearms.

a. The Singh Cellphone contains numerous photographs of what appear to be handguns. *See, e.g.*, Figures 20 and 21. According to metadata, the photograph in Figure 20 was taken on or about November 17, 2024, just a few weeks before the Robbery. Moreover, based on discussions with another law enforcement officer, I have learned that the metadata for this photograph indicates that it was taken by the Singh Cellphone, meaning that there is additional reason to believe that SINGH personally possessed (or at least had access) to the two handguns in the photograph.

¹¹ As described above, by this point, BHUPINDERJIT SINGH, a/k/a “Bhupinder Jit Singh,” a/k/a “Prince,” the defendant, had already lost the Singh Cellphone, having dropped it during the Robbery.

¹² Based on discussions with another law enforcement officer, I have learned that location information for the various cellphones indicates that, along the journey back from the Robbery, the Black BMW and Silver BMW appeared to have split up and taken different routes towards New York City.



Figure 20



Figure 21

b. Based on a review of ROMAN's criminal history records, I have learned that in or about August 2024, ROMAN was charged with, among other crimes, attempted murder, in violation of N.Y. PENAL LAW § 125.25(1); attempted assault with intent to cause serious injury with a weapon, in violation of N.Y. PENAL LAW § 120.10(1); and criminal possession of a loaded firearm, in violation of N.Y. PENAL LAW § 265.03(1)(b). Moreover, the Apple account to which the Roman Cellphone is connected, *see supra* ¶ 7(a), contains a photograph of what appears to be a black pistol (which resembles the pistols in Figure 20), *see* Figure 22.



Figure 22

c. The Apple account to which the Hall Cellphone is connected, *see supra* ¶ 8(b), contains a video that shows the man who appears to be taking the video holding what looks like a large handgun. *See* Figure 23.

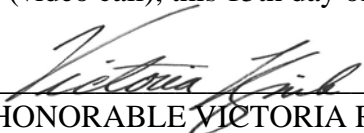


Figure 23

WHEREFORE, I respectfully request that warrants be issued for the arrest of BHUPINDERJIT SINGH, a/k/a “Bhupinder Jit Singh,” a/k/a “Prince,” ELIJAIH ROMAN, a/k/a “Swerv,” COREY HALL, ERIK SUAREZ, and DIVYA KUMARI, the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.

/s/ Dane Wakefield (signed by VR with permission)
DANE WAKEFIELD
Task Force Officer
Federal Bureau of Investigation
(signed with permission by the Hon. Victoria Reznik)

Sworn to me through the transmission of
this Complaint by reliable electronic
means (video call), this 15th day of January, 2025.



THE HONORABLE VICTORIA REZNIK
United States Magistrate Judge
Southern District of New York