



Approved:

JEFFREY C. COFFMAN
Assistant United States Attorney

Before: THE HONORABLE ANDREW E. KRAUSE
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA : **SEALED COMPLAINT** 21mj3696

- v. - : Violations of 18 U.S.C.
§§ 1951 and 924(c)

TISHAWN C. WOODS, :
a/k/a "Pettyboy," : COUNTY OF OFFENSES:
a/k/a "P.B.," : ORANGE

Defendant. :

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SOUTHERN DISTRICT OF NEW YORK, ss.:

THOMAS L. ANDERSON, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE
(HOBBS ACT ROBBERY)

1. On or about March 17, 2021, in the Southern District of New York, TISHAWN C. WOODS, a/k/a "Pettyboy," a/k/a "P.B.," the defendant, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), 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), and did aid and abet the same, to wit, WOODS committed an armed robbery of a marijuana dealer in the City of Newburgh, New York.

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

COUNT TWO
(FIREARM OFFENSE)

2. On or about March 17, 2021, in the Southern District of New York, TISHAWN C. WOODS, a/k/a "Pettyboy," a/k/a "P.B.," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count One of this Complaint, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was brandished and discharged.

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

COUNT THREE
(HOBBS ACT ROBBERY)

3. On or about March 22, 2021, in the Southern District of New York, TISHAWN C. WOODS, a/k/a "Pettyboy," a/k/a "P.B.," the defendant, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), 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), and did aid and abet the same, to wit, WOODS committed an armed robbery of a gas station convenience store located in the Town of New Windsor, New York.

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

COUNT FOUR
(FIREARM OFFENSE)

4. On or about March 22, 2021, in the Southern District of New York, TISHAWN C. WOODS, a/k/a "Pettyboy," a/k/a "P.B.," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Three of this Complaint, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use,

carrying, and possession of a firearm, which was brandished and discharged.

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

COUNT FIVE
(HOBBS ACT ROBBERY)

5. On or about March 28, 2021, in the Southern District of New York, TISHAWN C. WOODS, a/k/a "Pettyboy," a/k/a "P.B.," the defendant, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), 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), and did aid and abet the same, to wit, WOODS committed an armed robbery of a gas station convenience store in the Town of New Windsor, New York, and aided and abetted same.

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

COUNT SIX
(FIREARM OFFENSE)

6. On or about March 28, 2021, in the Southern District of New York, TISHAWN C. WOODS, a/k/a "Pettyboy," a/k/a "P.B.," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Five of this Complaint, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet use, carrying, and possession of a firearm, which was brandished and discharged.

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

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

7. I am a Special Agent with the FBI. I have been a Special Agent with the FBI since 2017, and am currently assigned to the FBI's Hudson Valley Safe Streets Task Force. During the course of my career, I have participated in numerous criminal investigations, including investigations involving robbery, firearms, narcotics, and gang violence. I am a case agent assigned to the current investigation. In the course of my career, I have been the affiant on numerous complaints and search warrants.

8. I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with other law enforcement officers, and my examination of reports and 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 the course of my participation in the investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

9. Law enforcement has been investigating a string of commercial armed robberies and a gunpoint home invasion robbery committed by two masked robbers in Orange County, during which the robbers brandished, and in some cases, discharged firearms. During the home invasion robbery, they shot the victim, inflicting a life-threatening injury. Based on my participation in this investigation, my conversations with and review of reports of other FBI agents and law enforcement officers of the City of Newburgh Police Department ("CNPD"), Town of Newburgh Police Department ("TNPD") and Town of New Windsor Police Department ("NWPD"), and my review of surveillance videos and still images, I am aware of the following, among other things:

March 17, 2021 Home Invasion Robbery

a. In the early morning hours of March 17, 2021, at approximately 3:24 a.m., CNPD officers responded to a report of a man shot at a location in the City of Newburgh, New York, where they found a man ("Victim-1") calling out to them while lying on the ground. Victim-1 reported, in substance and in part, that he had been shot in his stomach area, where a CNPD officer then observed a small puncture wound.

b. A CNPD officer located a .380 caliber PMC auto shell casing and a .45 caliber S&B auto shell casing on the floor near the open door of a first-floor apartment (the "Apartment") of the apartment building at which Victim-1 was found.

c. Law enforcement obtained surveillance video of the interior and exterior of the Apartment (the "Apartment Surveillance Video"), which depicts, among other things, the following:

i. At approximately 3:14 a.m. on March 17, 2021, two masked men approached the door to the Apartment.

ii. One of the men, a black male with visible dreadlocks ("CC-1"), carried a black, semi-automatic pistol.

iii. The other man, a taller, lighter-skinned male ("Subject-1"), carried a black semi-automatic pistol with silver stripes running down both sides of its slide ("Firearm-1").

iv. At approximately 3:14:40 a.m. on March 17, 2021, Victim-1 was inside the apartment and approached the door to the building's hallway. The door opened slightly, and the barrel of a pistol extended through its opening. Victim-1 put his weight against the door, attempting to close it, but the door was forced open by the two masked men. The two masked men burst inside the Apartment with their pistols drawn. At least one of the masked men discharged a pistol while entering the Apartment, causing what appears to me to be a shell casing to drop to the floor outside the Apartment.

v. After entering the Apartment, the two men forced Victim-1 to the ground both through physical force and by pointing their pistols at him. Victim-1 collapsed to the ground, as if he had been shot.

vi. The two masked men then grabbed items from the counter inside the Apartment, including a white bucket or pail, and fled through the same door through which they had entered at approximately 3:15:37 a.m.

vii. A short time later, Victim-1 slowly crawled out of the Apartment through the same door.

d. Victim-1 reported to law enforcement officers, in substance and in part, that the two masked men took from the Apartment, among other things, marijuana, which was contained in the white bucket or pail.

March 22, 2021 Gulf Robbery

e. Shortly before 1:00 a.m. on or about March 22, 2021, NWPD officers responded to a report of an armed robbery at a Gulf gas station in the town of New Windsor, New York ("Store-1"). The store's clerk ("Clerk-1") reported to officers, in substance and in part, that he had just been robbed by two masked men, both of whom were armed with handguns. Clerk-1 further reported, in substance and in part, that one of the men remained across the counter from him and fired his handgun while pointing it in Clerk-1's direction. The other man went behind the counter and instructed Clerk-1 to open the cash registers.

f. Inside Store-1, a NYPD officer recovered a .380 caliber PMC auto shell casing that appears to match the caliber and make of the shell casing recovered from outside the Apartment on March 17, 2021, as described in Paragraph 9(b) of this Complaint.

g. Surveillance video obtained from Store-1 (the "Store-1 Surveillance Video") depicts two masked men entering Store-1 at approximately 12:36 a.m. on March 22, 2021. Both displayed semi-automatic pistols to Clerk-1. One of the men, who appears to have a build consistent with that of CC-1, fired in Clerk-1's vicinity a black, semi-automatic pistol with silver stripes running down both sides of its slide, consistent with Firearm-1. The other man, who appears to have a build consistent with Subject-1, went behind the counter and took the money from the register. Both men then fled from the store.

March 28, 2021 Sunoco Robbery

h. At approximately 2:00 a.m. on or about March 28, 2021, NYPD officers responded to a report of an armed robbery at a Sunoco gas station in the town of New Windsor, New York ("Store-2"). The store's clerk ("Clerk-2") reported to officers, in substance and in part, that he had just been robbed by two masked men, one of whom was armed with a handgun, which he fired in Clerk-2's vicinity. Clerk-2 further reported, in substance and in part, that both men directed Clerk-2 to give them the money from the cash registers, which Clerk-2 did.

i. Inside Store-2, a NYPD officer recovered a .380 caliber PMC auto shell casing that appears to match the caliber and make of the shell casings recovered from the Apartment and Store-1 as described in Paragraphs 9(b) and 9(f) of this Complaint.

j. Surveillance video obtained from Store-2 (the "Store-2 Surveillance Video") depicts two masked men entering Store-2 at approximately 1:58 a.m. on March 28, 2021. One of the men, who appears to have a build consistent with that of CC-1, went behind the counter. The other man, who appears to have a build consistent with that of Subject-1, was armed with what appears to be Firearm-1, which he fired in the vicinity of Clerk-2. Both men then fled from the store with the cash.

k. Surveillance video obtained from another location less than approximately 50 yards down the street from Store-2 depicts the same two masked men running to a parked dark blue Honda CRV with a spare tire on its rear hatch (the "Blue Honda"), which

immediately departed. The Blue Honda's license plate is not visible in the video.

1. Surveillance video obtained from a fast food restaurant (the "Restaurant") located approximately six miles from the location of the March 28, 2021 robbery of Store-2 shows that on or about March 28, 2021, at approximately 2:20 a.m., a dark blue Honda CRV with a spare tire on its rear hatch and wheel rims that appear to be consistent with the Blue Honda, as described in Paragraph 9(k) of this Complaint, arrived in the Restaurant's drive-thru lane. This was approximately two hours and twenty minutes after the March 28, 2021 robbery. The Restaurant's surveillance video depicts a man I recognize to be TISHAWN C. WOODS, a/k/a "Pettyboy," a/k/a "P.B.," the defendant, based upon comparison with a prior booking photograph, driving the Blue Honda, with another person, whose face is not clearly visible, in the front passenger seat.

March 28, 2021 Arrest of CC-1

m. At approximately 4:02 a.m. on or about March 28, 2021, a CNPD Officer located the Blue Honda at a location¹ in the City of Newburgh. The CNPD officer observed that the Blue Honda's engine was running, and that it was occupied only by a black male with dreadlocks and a build consistent with CC-1, who appeared to be sleeping in the Blue Honda's rear seats. Law enforcement officers subsequently searched the Blue Honda and found, among other things, a white bucket or pail consistent with the bucket or pail containing marijuana taken by the robbers from the Apartment as described in Paragraphs 9(c)(vi) and 9(d) of this Complaint, and a cellphone identified herein as "CC-1's Cellphone," from its rear passenger seat area, where CC-1 was found sleeping.

Communications Between Woods and CC-1

10. Based on my review of the contents of CC-1's Cellphone, I am aware that, among other things:

i. The Facebook app installed on CC-1's Cellphone is configured to automatically log into a Facebook account (the "CC-1 Facebook Account"), the profile photograph of which depicts a man I recognize to be CC-1, whom I observed following his March 28, 2021 arrest.

¹ Google maps reflects that this location is approximately 4.7 miles from Store-2 by car.

b. The CC-1 Facebook Account exchanged Facebook Messenger text messages with another Facebook account (the "Woods Facebook Account") with the username "Pettyboy Wonder Hbk" and a profile photograph that depicts a man I recognize to be WOODS based upon comparison with a prior booking photograph.

c. On or about March 17, 2021, at approximately 5:59 a.m., the CC-1 Facebook Account sent a Facebook Messenger text message to the Woods Facebook Account asking "U good cuz?" This message was sent approximately two-and-a-half hours after the March 17, 2021 home invasion robbery, during which Victim-1 was shot in the stomach area, as described in Paragraphs 9(a) through 9(d) of this Complaint, and appears to have been the first Facebook Messenger exchange between the two accounts since early the prior evening. Based on my training, experience and participation in this investigation, I believe this was CC-1 confirming WOODS's status following their commission of the home invasion robbery earlier that night.

i. On or about March 17, 2021, at approximately 1:06 p.m., the CC-1 Facebook Account missed a call from the Woods Facebook Account. The Woods Facebook account then texted the CC-1 Facebook Account: "Ayo call this number asap it's me [phone number] like now cuz if you can fr fr." At approximately 1:16 p.m., the CC-1 Facebook Account missed another call from the Woods Facebook Account. At approximately 1:44 p.m., the CC-1 Facebook Account forwarded to the Woods Facebook Account an image of a news article located at <https://midhudsonnews.com/2021/03/17/gunfire-in-city-of-newburgh/>. The article, which was about the March 17, 2021 home invasion robbery, reads:

NEWBURGH - More gunfire in the City of Newburgh early Wednesday as police investigated at 43 Lutheran Street.

A male victim who was shot in the abdomen was taken to the hospital for treatment.

Officers found shell casings in the hallway at that address at around 3:30 a.m.

Police photographed and collected the evidence as the investigation was underway at the scene.

d. On or about March 22, 2021, at approximately 2:41 a.m., the Woods Facebook Account texted the CC-1 Facebook Account: "Call me when you get home cuz uak," and "Facxx imma need u to hit me when you get there." These messages were sent approximately two hours after the March 22, 2021 robbery described in Paragraphs

9(e) through 9(1) of this Complaint, and appear to have been the first Facebook Messenger text messages exchanged between the two accounts in approximately 24 hours. The CC-1 Facebook Account responded "Im good." Based on my training and experience and participation in this investigation, I believe this was WOODS confirming CC-1's status following their commission of the Gulf gas station robbery that night.

e. On or about March 27, 2021, beginning at approximately 10:39 a.m. (*i.e.*, approximately 17 hours before the March 28, 2021 gas station robbery described in Paragraphs 9(h) through 9(1) of this Complaint), the Woods Facebook Account and the CC-1 Facebook Account engaged in the following exchange, which based on my training and experience and participation in this investigation, I believe was about committing a gas station robbery that night:

CC-1: About to convince [name/nickname/initials] to help us hit a gas station tonight.
WOODS: She might not jacc it
CC-1: Or ask [name/nickname]
Just need a getaway driver
WOODS: Gangsta imma see if bro could slide he just be busy feel me but taxi vibes or nah [shrugging emojis] for now [crying emojis, skull emoji, shrugging emojis]
CC-1: Tryna do sum rn?? Ion mind cuz my poccets been getting thin

a. On or about March 28, 2021, at approximately 4:25 a.m., the Woods Facebook Account texted the CC-1 Facebook Account, "U good cuz." This message was sent approximately two-and-a-half hours after the March 28, 2021 robbery described in Paragraphs 9(h) through 9(1) in this Complaint, and appears to have been the first Facebook Messenger text messages exchanged between the two accounts in approximately 12 hours. Based on my training and experience and participation in this investigation, I believe this was WOODS confirming CC-1's status following their commission of the Sunoco gas station robbery that night.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of TISHAWN C. WOODS, a/k/a "Pettyboy," a/k/a "P.B.," the defendant, and that he be imprisoned or bailed, as the case may be.

*/s/ Thomas L. Anderson (by AEK, with
permission) (known to the court)*

Special Agent Thomas L. Anderson
Federal Bureau of Investigation

Sworn to before me by reliable electronic means, specifically
FaceTime, pursuant to Federal Rules of Criminal
Procedure 41(d)(3) and 4.1, this 5th day of April, 2021



THE HONORABLE ANDREW E. KRAUSE
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK