

ATTACHMENT A

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

On or about December 26, 2012, in Union County, in the District of New Jersey and elsewhere, defendant LARRY BROWN, with the intent to cause death and serious bodily harm, knowingly took a motor vehicle, namely a 2012 BMW X5, that had been transported, shipped, and received in interstate and foreign commerce from the person and presence of another, namely T.M., 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 December 26, 2012, in Union County, in the District of New Jersey and elsewhere, defendant LARRY BROWN, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically the carjacking set forth in Count One, did knowingly use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

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

ATTACHMENT B

I, Aaron Auclair, am a Task Force Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations. 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 December 26, 2012, at or around 6:30 a.m., T.M. was sitting in his/her vehicle, a bronze 2012 BMW X5, which was parked in Hillside. An individual wearing a ski mask, later identified as defendant LARRY BROWN, approached the vehicle. Defendant LARRY BROWN pointed a firearm at T.M., tapped on the vehicle's window with the firearm, and ordered T.M. out of the car. T.M. complied. After T.M. exited the vehicle, he/she was approached by a second individual wearing a ski mask who robbed T.M. of his/her personal items. Defendant LARRY BROWN and the other individual then entered T.M.'s vehicle and fled the area.

2. Later that same day, T.M.'s 2012 BMW X5 was located in the area of Glenwood Avenue in East Orange. Law enforcement officers observed two individuals, one of whom was defendant LARRY BROWN, walking away from T.M.'s 2012 BMW X5.

3. Later that same day, during the course of a recorded statement given after a Miranda waiver, defendant LARRY BROWN admitted that he carjacked the 2012 BMW X5 in Hillside earlier that day. During that statement, defendant LARRY BROWN also told law enforcement officers where he put the keys to the carjacked 2012 BMW X5 and the gun he used during the carjacking, both of which were recovered by law enforcement officers.

4. T.M.'s 2012 BMW X5 was not manufactured in the State of New Jersey.