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

UNITED STATES OF AMERICA : Honorable Cathy L. Waldor
 :
 v. : Mag. No. 13-7149
 :
 DARRELL A. CARTER, : **CRIMINAL COMPLAINT**
 DAQUAAN VAUGHN :
 LAVELL JONES, and :
 MARYLAND LIGGINS, III :

I, Carl M. Priddy, being duly sworn, state 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 pages and made a part hereof.



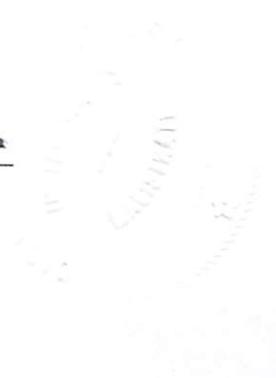
Carl M. Priddy, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
June 14, 2013 in Essex County, New Jersey

HONORABLE CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer



ATTACHMENT A

Count One – Hobbs Act Robbery

On or about November 23, 2012, in Union County, in the District of New Jersey and elsewhere, defendants,

DARRELL A. CARTER,
DAQUAAN VAUGHN
LAVELL JONES, and
MARYLAND LIGGINS, III

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, and commit and threaten physical violence to persons and property in furtherance thereof.

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

Count Two – Use of a Firearm in Furtherance of a Crime of Violence

On or about November 23, 2012, in Union County, in the District of New Jersey and elsewhere, defendants,

DARRELL A. CARTER, and
DAQUAAN VAUGHN

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 Hobbs Act robbery set forth in Count One, did knowingly use, carry, and in furtherance of such crime, possess firearm(s), which were brandished.

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

ATTACHMENT B

I, Carl M. Priddy, am a Special Agent with the Federal Bureau of Investigation (“FBI”). 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. Because 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 November 23, 2012, employees of the Target store located at 2235 Springfield Avenue, Union, New Jersey (the “Target”) were robbed at gunpoint (the “Target Robbery”). Based upon information obtained and reviewed in connection with the investigation of the Target Robbery, including video surveillance, cell phone toll records and cell site data, witness interviews, and other evidence, I am aware of the following facts.

2. Defendants DARRELL A. CARTER (“CARTER”), DAQUAAN VAUGHN (“VAUGHN”), LAVELL JONES (“JONES”) and MARYLAND LIGGINS, III (“LIGGINS”) agreed with each other and others to rob employees of the Target on “Black Friday,” i.e., the day after Thanksgiving. Black Friday is generally considered to be the busiest shopping day of the year. CARTER and VAUGHN agreed to enter the store and rob the store’s employees at gunpoint. LIGGINS agreed to be the getaway driver. Lastly, JONES agreed to pose as a shopper in the store and to alert CARTER and VAUGHN to the presence of law enforcement and to inform them when the store was closing.

3. Specifically, at approximately 9:47 p.m., two individuals later identified as defendants CARTER and VAUGHN entered the Target. Security cameras captured their movements while in the store. Shortly after entering the Target, CARTER and VAUGHN entered an employee bathroom and stayed there for a period of time.

4. At some point after CARTER and VAUGHN entered the store, an individual later identified as defendant JONES entered the store. Security cameras captured his movements while in the store. While in the store, JONES made several calls to CARTER, and also had telephonic communications with LIGGINS. Shortly after 11:00 p.m., JONES purchased several items and then exited the store.

5. At approximately 11:01 p.m., a Target employee attempted to enter the bathroom in which CARTER and VAUGHN were located. CARTER and VAUGHN physically grabbed the employee and forced him into the bathroom brandishing handguns. Once they forced the employee inside the bathroom, CARTER and VAUGHN restrained his hands behind his back with zip-ties and told him, in sum and substance, to think about his family. CARTER and VAUGHN also demanded the code to a secure area of the store known as the “cash room” and the secure hallway that leads to the cash room. The employee provided the code.

6. At approximately 11:16 p.m., CARTER and VAUGHN took the employee and used the code to enter the secure hallway. Once in the hallway, CARTER and VAUGHN forced the employee into a utility room which was next to the cash room.

7. At approximately 11:28 p.m., Target employees were transporting cash in a secure cart from the store registers to the cash room. As soon as the employees opened the doors to the cash room, CARTER and VAUGHN exited the utility room with the employee they were guarding, and they forcefully pushed their way into the cash room by pointing guns at the Target employees who were transporting the cash cart. Once inside the cash room, CARTER and VAUGHN ordered employees to lie on the ground. CARTER and VAUGHN then attempted to disable the security camera in the room, and thereafter took cash from the cash cart and a safe in the cash room, which they stuffed into garbage bags. After taking more than \$50,000, CARTER and VAUGHN quickly left the cash room.

8. After leaving the cash room, CARTER and VAUGHN exited the store. Exterior surveillance cameras captured CARTER and VAUGHN leaving the store property in the direction of nearby Route 78. As CARTER and VAUGHN were doing so, a vehicle driven by LIGGINS was waiting on the shoulder of Route 78. CARTER and VAUGHN entered the vehicle, and the vehicle drove away.

9. Records relating to the cellular telephones used by defendants LIGGINS (“LIGGINS Phone”), CARTER (“CARTER Phone”) and JONES (“JONES Phone”) demonstrate numerous calls between and among them during the time of the Target Robbery. For example, at approximately 11:14 p.m. on the evening of the robbery, the JONES Phone made a call to the CARTER Phone. Two minutes later, at approximately 11:16 p.m., the JONES Phone made a call the LIGGINS Phone. As noted above, JONES’s role was to pose as a customer and to inform the gunmen (CARTER and VAUGHN) and the getaway driver (LIGGINS) when the Target was closing so that they could expect when the cash cart was en route to the cash room. Indeed, as stated above, the robbery happened shortly thereafter.

10. Law enforcement has also obtained cell site data for the above-referenced cellular telephones. The cell site data establishes that the LIGGINS phone, CARTER Phone and JONES phone were all near a cell tower in the vicinity of the Target during the time of the robbery.

11. The investigation has also revealed that, after the robbery, the defendants purchased various personal items using large sums of cash. For example, on or about November 24, 2012, JONES and LIGGINS purchased new vehicles with cash.

12. At all times material to this Complaint, the Target was a commercial establishment engaged in selling merchandise that moved in, was transferred in, and affected interstate and foreign commerce.