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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA

v.

SULAYMAN GRAHAM,  
a/k/a "Two Five"

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**CRIMINAL COMPLAINT**

Mag. No. 13-4160

I, Carrie Brzezinski, 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:

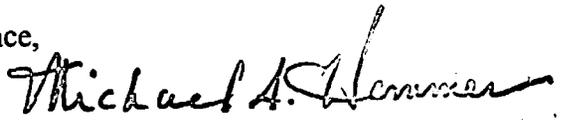
SEE ATTACHMENT B

Continued on the attached page and made a part hereof.

  
Special Agent Carrie Brzezinski  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
July 23, 2013 in Newark, New Jersey

HONORABLE MICHAEL A. HAMMER  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

UNITED STATES DEPARTMENT OF JUSTICE  
DISTRICT OF COLUMBIA

OFFICE OF THE ATTORNEY GENERAL

WASHINGTON, D.C. 20530

MAIL ROOM

Enclosed for the attention of the Director of the Federal Bureau of Investigation are the following documents:

ATTORNEY GENERAL

Enclosed for the attention of the Director of the Federal Bureau of Investigation are the following documents:

ATTORNEY GENERAL

Enclosed for the attention of the Director of the Federal Bureau of Investigation are the following documents:



Very truly yours,  
[Signature]

[Signature]

Assistant Attorney General

Enclosed for the attention of the Director of the Federal Bureau of Investigation are the following documents:

**ATTACHMENT A**

On or about October 2, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendant

SULAYMAN GRAHAM,  
a/k/a "Two Five,"

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendant SULAYMAN GRAHAM, a/k/a "Two Five," did unlawfully take and obtain personal property consisting of cellular telephones from the persons of and in the presence of employees of T-Mobile, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property, and property in their custody and possession.

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

## ATTACHMENT B

I, Carrie Brzezinski, 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. The FBI is investigating a string of armed robberies that took place between at least in or around May 2012 and in or around January 2013 in, among other places, Bergen, Middlesex, and Union Counties in New Jersey, including armed robberies of a T-Mobile store in Linden, New Jersey, on or about September 20, 2012, a T-Mobile store in Woodbridge, New Jersey, on or about October 2, 2012, and a T-Mobile store in Paramus, New Jersey, on or about January 16, 2013. All of the robberies under investigation were armed robberies involving commercial establishments, including cellular telephone and electronics stores. Based upon information obtained and reviewed in connection with the investigation, including video surveillance, text messages, cell phone toll records and cell site data, witness interviews, and other evidence, I am aware of the following facts.

2. On or about October 2, 2012, at approximately 12:30 pm., two black males, one of whom was armed with a firearm, entered a T-Mobile store located at 744 Route 1 North in Woodbridge, New Jersey (the "Woodbridge T-Mobile Store"). After entering the store, one of the men locked the entrance door. The men then brought the employees to the rear of the store and tied them up. The men took from the store approximately forty cell phones. One of the men appears to have used his own cell phone to contact a co-conspirator. Shortly thereafter, defendant SULAYMAN GRAHAM, a/k/a "Two Five," the get-away driver, immediately drove the other men away in a Land Rover. Following the robbery, SULAYMAN GRAHAM, a/k/a "Two Five," and other co-conspirators delivered the stolen T-Mobile cell phones to a cell phone store in Brooklyn, New York.

3. Law enforcement has obtained the cell site data for a cellular telephone facility used by, and registered in the name of, SULAYMAN GRAHAM, a/k/a "Two Five" (the "GRAHAM Phone"). The GRAHAM Phone was near a cell tower in the vicinity of the Woodbridge T-Mobile Store shortly before the robbery took place. Shortly after the robbery, the GRAHAM Phone was near a cell tower in the vicinity of the Brooklyn, New York, cell phone store that subsequently sold the cell phones that were stolen during the robbery. Surveillance video from the Brooklyn, New York, cell phone store shows SULAYMAN GRAHAM, a/k/a "Two Five," and numerous other co-conspirators inside the cell phone store shortly after the robbery on or about October 2, 2012.

4. At all times material to this Complaint, the T-Mobile store in Woodbridge, New Jersey, was a commercial establishment engaged in selling merchandise that moved in, and was transferred in, and affected interstate and foreign commerce.