

ATTACHMENT A

Count One – Hobbs Act Robbery Conspiracy
(Defendants McQueen, Carl Williams, and Eric Williams)

From at least on or about September 20, 2012, through at least on or about October 3, 2012, in the District of New Jersey and elsewhere, defendants,

TERRELL MCQUEEN,
a/k/a “Rell”
CARL WILLIAMS,
a/k/a “Andrew,”
a/k/a “Drew,” and
ERIC WILLIAMS,

did knowingly and willfully conspire and agree between and among one another and others, known and unknown, to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, and committed and threatened physical violence to persons and property in furtherance thereof.

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

Count Two – Use of a Firearm in Furtherance of a Crime of Violence
(Defendants McQueen and Carl Williams)

On or about September 20, 2012, in the District of New Jersey and elsewhere,
defendants,

TERRELL MCQUEEN,
a/k/a “Rell,” and
CARL WILLIAMS,
a/k/a “Andrew,”
a/k/a “Drew,”

during and in relation to a crime of violence for which defendants, TERRELL MCQUEEN, a/k/a “Rell,” and CARL WILLIAMS, a/k/a “Andrew,” a/k/a “Drew,” may be prosecuted in a court of the United States, specifically the Hobbs Act robbery of the T-Mobile store located at 1601 E. Edgar Road in Linden, New Jersey, did knowingly and willfully use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

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

Count Three – Use of a Firearm in Furtherance of a Crime of Violence
(Defendants McQueen and Eric Williams)

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

TERRELL MCQUEEN,
a/k/a “Rell”
ERIC WILLIAMS,

during and in relation to a crime of violence for which defendants, TERRELL MCQUEEN, a/k/a “Rell,” and ERIC WILLIAMS, may be prosecuted in a court of the United States, specifically the Hobbs Act robbery of the T-Mobile store located at 744 Route 1 North in Woodbridge, New Jersey, did knowingly and willfully use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) 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. On or about September 20, 2012, at approximately 4:27 p.m., a T-Mobile store located at 1601 E. Edgar Road in Linden, New Jersey, was robbed by two black males (the "Linden Robbery"). Surveillance video from the store shows that, after entering the store, one of the men locked the entrance door. One man displayed a firearm. The men tied up store employees. After the employees were tied up, the men took approximately fifty to sixty cell phones. The men fled in a Land Rover driven by a third individual.

2. On or about October 2, 2012, at approximately 12:30 p.m., two black males, at least 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 Robbery"). Surveillance video from the store shows that, 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. Surveillance video shows that one of the men appears to have used his own cellular telephone to contact a third individual, the get-away driver, who immediately drove the other two men away in a Land Rover.

3. Following each of the robberies, TERRELL MCQUEEN, a/k/a "Rell," and other co-conspirators delivered the stolen T-Mobile cell phones to a cell phone store in Brooklyn, New York. Surveillance video from the cell phone store appears to show TERRELL MCQUEEN, a/k/a "Rell," and numerous other co-conspirators inside the cell phone store after the Woodbridge Robbery on or about October 2, 2012. Further on or about the day of each of the robberies, TERRELL MCQUEEN, a/k/a "Rell," sent text messages indicating that he had numerous cell phones for sale.

4. TERRELL MCQUEEN, a/k/a "Rell," had access to, and drove, a Land Rover in September 2012. A cellular telephone facility used by TERRELL MCQUEEN, a/k/a "Rell," was near a cell tower in the vicinity of the Linden Robbery shortly before the robbery took place. The same cellular telephone facility was near a cell tower in the vicinity of the Woodbridge Robbery shortly before the robbery took place. Following each of the robberies, the same cellular telephone facility was near a cell tower in the vicinity of the Brooklyn, New York, cell phone store that had been selling cell phones that were stolen during the Woodbridge Robbery.

5. Surveillance video taken from the T-Mobile store appears to show CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew," walking into the store during the Linden Robbery, while a co-conspirator displays a firearm. Based on the contents of text messages, law enforcement has identified a cellular telephone facility used by CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew." That cellular telephone facility was near a cell tower in the vicinity of

the Linden Robbery shortly before the robbery took place. Further, text messages from that cell phone indicate that CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew," was in New Jersey before and during the time of the Linden Robbery and then returned to Brooklyn, New York, after the robbery. Call detail records show numerous cell phone calls between TERRELL MCQUEEN, a/k/a "Rell," and CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew," on the day of the Linden Robbery.

6. A cellular telephone facility used by ERIC WILLIAMS was near a cell tower in the vicinity of the Linden Robbery shortly before the robbery took place. Similarly, the same cellular telephone facility was near a cell tower in the vicinity of the Woodbridge Robbery shortly before the robbery took place. Following each of the robberies, the same cellular telephone facility was near a cell tower in the vicinity of a Brooklyn, New York, cell phone store that had been selling cell phones that were stolen during the Woodbridge Robbery. After the Woodbridge Robbery, CARL WILLIAMS a/k/a "Andrew," a/k/a "Drew," sent text messages to a cellular telephone facility used by ERIC WILLIAMS referencing "that joint we hit" in New Jersey.