
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Madeline Cox Arleo
 : :
 : Mag. No. 13-8274 (MCA)
 : :
v. : :
 : :
LARRY MCRAE : :
 : :
 : **CRIMINAL COMPLAINT**

I, Douglas Man, 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.

Douglas Man, Special Agent
Federal Bureau of Investigation

Sworn to before me and
subscribed in my presence,

August 23, 2013, in
Newark, New Jersey

HON. MADELINE COX ARLEO
U.S. MAGISTRATE JUDGE

Madeline Cox Arleo

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE - Hobbs Act Robbery

On or about June 30, 2012, in Essex County, in the District of New Jersey and elsewhere, defendant

LARRY MCRAE

did knowingly and willfully 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 the defendant did unlawfully take and obtain personal property, including but not limited to United States currency, from the persons of and in the presence of employees of Angel Mini Market, 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, Section 1951(a) and Section 2.

COUNT TWO - Hobbs Act Robbery

On or about June 30, 2012, in Essex County, in the District of New Jersey and elsewhere, defendant

LARRY MCRAE

did knowingly and willfully 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 the defendant did unlawfully take and obtain personal property, including but not limited to United States currency, from the persons of and in the presence of employees of Arvelo Mini Market, 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, Section 1951(a) and Section 2.

COUNT THREE - Hobbs Act Robbery

On or about August 29, 2012, in Essex County, in the District of New Jersey and elsewhere, defendant

LARRY MCRAE

did knowingly and willfully 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 the defendant did unlawfully take and obtain personal property, including but not limited to United States currency, from the persons of and in the presence of employees of the New B&C Meat Market, 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, Section 1951(a) and Section 2.

COUNT FOUR - Hobbs Act Robbery

On or about September 1, 2012, in Essex County, in the District of New Jersey and elsewhere, defendant

LARRY MCRAE

did knowingly and willfully 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 the defendant did unlawfully take and obtain personal property, including but not limited to United States currency, from the persons of and in the presence of employees of P&T Grocery, 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, Section 1951(a) and Section 2.

COUNT FIVE - Hobbs Act Robbery

On or about September 5, 2012, in Essex County, in the District of New Jersey and elsewhere, defendant

LARRY MCRAE

did knowingly and willfully 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 the defendant did unlawfully take and obtain personal property, including but not limited to United States currency, from the persons of and in the presence of employees of P&T Grocery, 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, Section 1951(a) and Section 2.

COUNT SIX - Hobbs Act Robbery

On or about September 15, 2012, in Essex County, in the District of New Jersey and elsewhere, defendant

LARRY MCRAE

did knowingly and willfully 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 the defendant did unlawfully take and obtain personal property, including but not limited to United States currency, from the persons of and in the presence of employees of the Moroni Deli, 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, Section 1951(a) and Section 2.

COUNT SEVEN

Discharging a Firearm in Furtherance of a Crime of Violence

On or about September 15, 2012, in Essex County, in the District of New Jersey and elsewhere, defendant

LARRY MCRAE

during and in relation to a crime of violence for which defendant LARRY MCRAE may be prosecuted in a court of the United States, specifically, the Hobbs Act robbery charged in Count Six, did knowingly use and carry a firearm, and did, in furtherance of such crime, possess a firearm, which firearm was discharged.

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

ATTACHMENT B

I, Douglas Man, am a Special Agent with the Federal Bureau of Investigation. 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. Beginning in or about June 2012 to in or about September 2012, Larry McRae ("MCRAE") committed a series of armed robberies of various commercial establishments located in Essex County in the District of New Jersey. As a result of an investigation, law enforcement was able to determine that MCRAE was responsible for the robberies.

2. During the course of the investigation, law enforcement officers spoke to several victims and witnesses. Officers also retrieved video surveillance recordings and/or photographs from the commercial establishments.

3. At or around 9:24 a.m. on or about September 15, 2012, a male entered the Moroni Deli and Grocery Store ("Moroni Deli") located at 475 15th Avenue in Newark, New Jersey, armed with a handgun, wearing a grey hooded sweatshirt, and a mask covering his face. The male robbed the store clerk at gunpoint of approximately \$48 in United States currency, and discharged one round from the handgun while exiting the store. Shortly thereafter, law enforcement saw MCRAE stuffing a grey sweatshirt into a backpack a short distance from the Moroni Deli. As law enforcement approached, MCRAE fled on foot and tossed the backpack. MCRAE was apprehended and the backpack and its contents were recovered. Inside the backpack, law enforcement recovered a grey-colored hooded sweatshirt, light-colored pants, a pair of black gloves, a black bandana, a black head scarf, and a silver revolver containing several live rounds and one spent shell casing. The clothing items and the revolver matched the description provided by the store clerk at the Moroni Deli. The store clerk later identified MCRAE as the robber after being shown a photo array.

4. Through victim identification and/or video surveillance, MCRAE was identified as the person who committed five other armed robberies.

5. On or about June 30, 2012, between 8:40 a.m. and 8:45 a.m., MCRAE robbed at gunpoint, a commercial establishment doing business as the Angel Mini Market in Newark, New Jersey. MCRAE walked into the store and while brandishing a handgun to the store clerk, robbed the store of its business proceeds, between \$80 to \$100 in United States currency. The store clerk later identified MCRAE as the robber after being shown a photo array. The robbery was captured on the store's video surveillance system and video stills of MCRAE were also captured. A review of the video surveillance showed MCRAE arriving and later departing from the scene in a silver car.

6. On or about June 30, 2012, between 9:00 a.m. and 9:10 a.m., MCRAE robbed at gunpoint, a commercial establishment doing business as the Arvelo Mini Market in Newark, New Jersey. The Arvelo Mini Market is located a short distance away from the Angel Mini Market within the City of Newark. MCRAE walked into the store and while brandishing a handgun to the store clerk, robbed the store of its business proceeds, approximately \$1,000 in United States currency and lottery tickets. During this robbery captured on the store's video surveillance system, MCRAE pressed the handgun up against the clerk's body. A review of the video surveillance system revealed that MCRAE wore a grey hooded sweatshirt, grey gloves, and a blue bandana, all of which were worn by MCRAE during the robbery of the Angel Mini Market several minutes earlier on the same day. The video surveillance also showed MCRAE arriving at the scene in a silver car.

7. On or about August 29, 2012, MCRAE robbed at gunpoint, a commercial establishment doing business as the New B&C Meat Market in Newark, New Jersey. MCRAE walked into the store and while brandishing a handgun to the store clerk, robbed the store of its business proceeds, approximately \$200 in United States currency. The store clerk later identified MCRAE as the robber after being shown a photo array. The robbery was captured on the store's video surveillance system.

8. On or about September 1, 2012, MCRAE robbed at gunpoint, a commercial establishment doing business as P&T Grocery in Newark, New Jersey. MCRAE walked into the store, verbally threatened to shoot the store clerk, and while brandishing a handgun, robbed the store of its business proceeds, between \$300 to \$400 in United States currency. The store clerk later identified MCRAE as the robber after being shown a photo

array. The robbery was captured on the store's video surveillance system and video stills of MCRAE were captured as he exited the store.

9. On or about September 5, 2012, MCRAE robbed at gunpoint, a commercial establishment doing business as P&T Grocery in Newark, New Jersey. MCRAE walked into the store and while brandishing a handgun to the store clerk, robbed the store of its business proceeds, approximately \$835 in United States currency. The store clerk later identified MCRAE as the robber after being shown a photo array. The robbery was captured on the store's video surveillance system including video of MCRAE as he exited the store.

10. Based upon further review of the available surveillance footage from the robberies, the complexion, build and gait of the suspect are consistent and appear to show the same person committing the robberies.

11. At all times relevant to this Complaint, the above mentioned commercial establishments that are described in Counts One through Six, were engaged in selling merchandise that moved in, and was transferred in, and affected interstate and foreign commerce, as defined in 18 U.S.C. section 1951(b)(3).