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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA :  
 :  
 v. : **CRIMINAL COMPLAINT**  
 :  
 : Mag. No. 13-4159  
 UNIQUE RANDOLPH :

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:

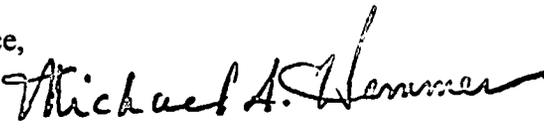
SEE ATTACHMENT B

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  
FEDERAL BUREAU OF INVESTIGATION

MEMORANDUM FOR THE DIRECTOR

DATE: 10-15-52

TO: THE DIRECTOR

FROM: SAC, NEW YORK

Re: [Illegible text]

A. SUMMARY

[Illegible text]

B. DETAILS

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]



**ATTACHMENT A**

**Count One – Hobbs Act Robbery**

On or about January 16, 2013, in Bergen County, in the District of New Jersey and elsewhere, defendant

UNIQUE RANDOLPH,

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 UNIQUE RANDOLPH did unlawfully take and obtain personal property consisting of United States currency and 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.

**Count Two – Brandishing a Firearm in Furtherance of a Crime of Violence**

On or about January 16, 2013, in Bergen County, in the District of New Jersey and elsewhere, defendant

UNIQUE RANDOLPH,

during and in relation to a crime of violence for which defendant UNIQUE RANDOLPH may be prosecuted in a court of the United States, specifically the Hobbs Act robbery charged in Count One, did knowingly use and carry a firearm, and did, in furtherance of such crime, possess a firearm, which firearm 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. 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, and of a T-Mobile store in Woodbridge, New Jersey, on or about October 2, 2012. 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 January 16, 2013, at approximately 1:56 p.m., defendant UNIQUE RANDOLPH and a co-conspirator ("C.C.1") entered the T-Mobile store located at 636 Route 17 North in Paramus, New Jersey. After attempting to lock the entrance door, one of the men approached a store employee and brandished a firearm. At that point, UNIQUE RANDOLPH and C.C.1 led three store employees and a customer to the back room.

3. After tying up two of the employees and the customer and forcing them to lie on the floor, UNIQUE RANDOLPH and C.C.1 forced the third employee to open the store's safe at gunpoint, and they stole approximately \$500 in cash. UNIQUE RANDOLPH and C.C.1 then forced the third employee to fill two laundry bags with approximately seventy-four (74) cell phones, including Samsung Galaxy cell phones. Once the employee had finished putting the cell phones into the laundry bags, the men tied her up and forced her to lie on the floor.

4. At some point during the robbery, a UPS employee walked into the store, at which point one of the men pointed his firearm at the UPS employee. C.C.1 then brought the UPS employee to the back room, tied him up, and forced him onto the floor.

5. Shortly after the robbery began, another co-conspirator ("C.C.2"), who was waiting outside the store, sent text messages to a cellular telephone facility used by, and registered in the name of, UNIQUE RANDOLPH, asking, "Youll aint [sic] get the safe" and "[o]r some of the registers"? UNIQUE RANDOLPH responded with the following text message: "[. . .] once the ups [. . .] came in i wasnt thinking bout [sic] no damn registers bro real talk." UNIQUE RANDOLPH further responded: "But it got to be like 50 galaxy 3s we got or evenmore [sic]."

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