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

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UNITED STATES OF AMERICA                   :           Honorable Joseph A. Dickson  
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  :           Mag. No. 13-~~6689~~ 6700  
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ANTWON YARBROUGH                         :           **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 pages and made a part hereof.

  
\_\_\_\_\_  
Douglas Man, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
September 9, 2013 in Essex County, New Jersey

HONORABLE JOSEPH A. DICKSON  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**Count One – Hobbs Act Robbery**

On or about April 24, 2013, in Essex County, in the District of New Jersey and elsewhere, defendant,

ANTWON YARBROUGH,

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, and committed and threatened 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 – Hobbs Act Robbery**

On or about May 20, 2013, in Essex County, in the District of New Jersey and elsewhere, defendant,

ANTWON YARBROUGH,

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, and committed and threatened physical violence to persons and property in furtherance thereof.

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

**Count Three – Use of a Firearm in Furtherance of a Crime of Violence**

On or about May 20, 2013, in Essex County, in the District of New Jersey and elsewhere, defendant,

ANTWON YARBROUGH,

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically, the Hobbs Act robbery set forth in Count Two, did knowingly use, carry, and in furtherance of such crime, possess a firearm, which was brandished, and did aid and abet the same.

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

## ATTACHMENT B

I, Douglas Man, 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 in or around December 2012 and in or around May 2013 in Essex, Union, and Bergen Counties in New Jersey. The robberies involved commercial establishments, including convenience stores, restaurants, and gas stations. Based upon information obtained and reviewed in connection with the investigation, including video surveillance, cell phone toll records and cell-site data, witness interviews, and other evidence, I am aware of the following facts.

2. On or about April 24, 2013, at approximately 11:48 p.m., ANTWON YARBROUGH ("YARBROUGH") and another male robbed a Krausz's Food Store in West Orange, New Jersey (the "Krausz's Robbery"). Krausz's surveillance video captured the robbery. The two robbers entered Krausz's wearing dark hoodies, face masks, and gloves. YARBROUGH secured the door from the inside using a white plastic zip tie, while the other robber pointed a firearm at a clerk behind the counter and pushed the clerk to the floor. YARBROUGH restrained two victims by binding their hands and feet with zip ties, striking one in the head with his forearm. The robber brandishing the firearm restrained the clerk with zip ties, struck the clerk in the head with the gun, and emptied the cash register into a black backpack, taking approximately \$1,805 in cash. YARBROUGH went behind the counter and placed cartons of Newport cigarettes in the backpack, as well. After taking the cash and cigarettes, the robbers removed the zip tie from the door and fled the area.

3. Law enforcement officers obtained records associated with YARBROUGH's cell phone number, including toll records and historical cell-site data. The cell-site data corresponding with YARBROUGH's phone indicates that YARBROUGH's phone was in the vicinity of the Krausz's in West Orange around the time of the Krausz's Robbery.

4. On or about May 20, 2013, at approximately 10:52 p.m., YARBROUGH and two other males robbed a Subway restaurant in Verona, New Jersey (the "Subway Robbery"). Subway's surveillance video captured the robbery. The robbers entered Subway wearing dark shirts/hoodies, face masks, and gloves. Both robbers accompanying YARBROUGH brandished firearms. Upon entering, YARBROUGH and the other robbers restrained an employee in the back of the restaurant by binding his/her hands and feet with white plastic zip ties. After restraining the employee, the robbers emptied the cash register, taking approximately \$409.75 in cash. YARBROUGH and the other robbers then fled the area.

5. Based on a review of the surveillance videos from the Krausz's Robbery and the Subway Robbery, YARBROUGH appears to be wearing the same or similar clothing in both robberies.

6. At all times material to this Complaint, Krauszers and Subway were commercial establishments engaged in selling food, beverages, and other items that moved in, were transferred in, and affected interstate and foreign commerce.