
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Mark Falk
 :
 v. : Mag. No. 14-3760 (MF)
 :
 DION HINES and :
 :
 ROOSEVELT ROBINSON : **CRIMINAL COMPLAINT**

I, Todd Anderson, 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 United States Department of Homeland Security, Homeland Security Investigations and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Todd Anderson, Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me and subscribed in my presence,
September 17, 2014 at Newark, New Jersey

HONORABLE MARK FALK
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Attempted Carjacking)

On or about September 22, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants

DION HINES
and
ROOSEVELT ROBINSON,

with the intent to cause death and serious bodily harm, did knowingly attempt to take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce, namely, a silver 2010 Mercedes Benz E350, from the person and presence of another, namely, Victim 1, by force and violence and by intimidation.

In violation of Title 18, United States Code, Sections 2119(1) and 2.

COUNT TWO
(Using and Carrying a Firearm During and in Relation to a Crime of Violence)

On or about September 22, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants

DION HINES
and
ROOSEVELT ROBINSON,

during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, namely, the attempted carjacking charged in Count One of this complaint, did knowingly use and carry a firearm, which firearm was discharged, and did aid and abet the same.

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

COUNT THREE
(Carjacking)

On or about September 26, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendant

DION HINES,

with the intent to cause death and serious bodily harm, did knowingly take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce, namely, a black 2009 Acura TL, from the person and presence of another, namely, Victim 3, by force and violence and by intimidation.

In violation of Title 18, United States Code, Sections 2119(1) and 2.

COUNT FOUR
(Carjacking)

On or about September 27, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants

DION HINES
and
ROOSEVELT ROBINSON,

with the intent to cause death and serious bodily harm, did knowingly take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce, namely, a white 2013 Range Rover, from the person and presence of another, namely, Victim 4, by force and violence and by intimidation.

In violation of Title 18, United States Code, Sections 2119(1) and 2.

ATTACHMENT B

I, Todd Anderson, am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations. 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 in 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 22, 2013, at approximately 10:30 p.m., defendant DION HINES, defendant ROOSEVELT ROBINSON, and another male (“co-conspirator 1”) approached a silver 2010 Mercedes Benz E350 sedan (the “Mercedes Benz”) that was parked inside a residential driveway in Newark, New Jersey. Defendant DION HINES brandished a silver revolver and ordered Victim 1, who was in the driver’s seat of the Mercedes Benz, to get out of the vehicle. Defendant DION HINES, defendant ROOSEVELT ROBINSON, and co-conspirator 1 pulled on the driver’s side door, but Victim 1 resisted. Defendant ROOSEVELT ROBINSON then stated, “shoot that motherfucker.” Victim 1 eventually got out of the Mercedes Benz and defendant ROOSEVELT ROBINSON took Victim 1’s place in the driver’s seat. Defendant DION HINES and the other male then fled on foot.

2. After defendant DION HINES and co-conspirator 1 ran away, Victim 1 pulled defendant ROOSEVELT ROBINSON from the Mercedes Benz and fought with him. After a brief struggle, Victim 1 got back into the Mercedes Benz and put the vehicle in reverse. At this point, defendant DION HINES returned and fired two shots at the Mercedes Benz, striking the rear driver’s side door. Defendant DION HINES, defendant ROOSEVELT ROBINSON, and co-conspirator 1 then ran down the block and jumped into a car waiting nearby. Victim 1 pursued the males in the Mercedes Benz, striking both the getaway car and defendant ROOSEVELT ROBINSON before defendant ROOSEVELT ROBINSON entered the vehicle. A car chase ensued, during which defendant DION HINES fired two additional shots at the Mercedes Benz.

3. On or about September 26, 2013, at approximately 9:25 p.m., defendant DION HINES approached Victim 2 inside a parking lot next to a residence in Newark, New Jersey. Victim 2 had just parked Victim 2’s vehicle in the parking lot, and was walking back toward the entrance. Defendant DION HINES pointed a black revolver at Victim 2 and stated, “give me your car keys or I’ll shoot.” Defendant DION HINES then cocked the revolver. Around this time, Victim 3, who had just parked Victim 3’s black 2009 Acura TL sedan (the “Acura TL”) in the parking lot, walked over to where Victim 2 and defendant DION HINES were standing. Defendant DION HINES then pointed the revolver at Victim 3 and demanded Victim 3’s car keys. Victim 3 complied. After taking Victim 2’s cell phone, defendant DION HINES got into Victim 3’s Acura TL and fled.

4. On or about September 27, 2013, at approximately 4:45 a.m., a dark-colored SUV driven by an unknown person pulled in front of a white 2013 Range Rover (the “Range Rover”)

that was stopped at an intersection in Belleville, New Jersey, blocking the Range Rover's path. Defendant DION HINES jumped out of the passenger side of the dark-colored SUV and pointed a black handgun at Victim 4, who was in the driver's seat of the Range Rover. Defendant DION HINES then approached the driver's side door, pulled Victim 4 out of the Range Rover, and demanded Victim 4's car keys. Victim 4 complied. After taking Victim 4's keys, defendant DION HINES got into the Range Rover and fled. The dark-colored SUV followed after it.

5. At approximately 2:20 p.m. that afternoon, law enforcement located the Range Rover traveling in Newark, New Jersey. Law enforcement officers immediately responded to the area in marked police vehicles and attempted to stop the Range Rover. A brief car chase ensued, during which the Range Rover rammed multiple police vehicles before getting trapped and stopping. Law enforcement officers surrounded the Range Rover with their guns drawn and ordered its three occupants – defendant DION HINES, defendant ROOSEVELT ROBINSON, and another male, who was driving the vehicle – to show their hands. Defendant DION HINES and defendant ROOSEVELT ROBINSON both exited the Range Rover and ran. Law enforcement officers pursued both men and arrested them shortly thereafter. The third occupant was taken into custody immediately. After arresting defendant DION HINES, defendant ROOSEVELT ROBINSON, and the other male, law enforcement officers searched the Range Rover and discovered a loaded black revolver on the rear passenger's side floorboard.

6. Victim 1 later positively identified defendant DION HINES as the male who attempted to take Victim 1's Mercedes Benz at gunpoint and who fired four shots at the Mercedes Benz while Victim 1 was in the vehicle on or about September 22, 2013. Victim 1 also positively identified defendant ROOSEVELT ROBINSON as the male with whom Victim 1 fought during the attempted carjacking, and whom Victim 1 struck with the Mercedes Benz when defendant DION HINES, defendant ROOSEVELT ROBINSON, and co-conspirator 1 fled.

7. Victim 2 later positively identified defendant DION HINES as the male who took Victim 3's Acura TL at gunpoint on or about September 26, 2013.

8. Victim 4 later positively identified defendant DION HINES as the male who took Victim 4's Range Rover at gunpoint on or about September 27, 2013.

9. The Mercedes Benz, the Acura TL, and the Range Rover were all manufactured outside the State of New Jersey.