UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA **CRIMINAL COMPLAINT**

Hon. José R. Almonte, U.S.M.J. v.

: Mag. No. 24-16004

AHMAD SINGLETARY and

JOSEPH YOUNG

I, Lyndsay LeBedda, the undersigned complainant 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 Bureau of Alcohol, Tobacco, Firearms and Explosives and that this complaint is based on the following facts:

SEE ATTACHMENT B

<u>Lyndsay LaBedda</u> Lyndsay LeBedda, Special Agent Bureau of Alcohol, Tobacco, Firearms and Explosives

Special Agent Lyndsay Lebedda attested to this Complaint by telephone pursuant to Fed. R. Crim. Pro. 4.1(b)(2)(A) on January 9, 2024 in the District of New Jersey

Honorable José R. Almonte United States Magistrate Judge

José R. Almonte Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Interfere with Commerce by Robbery)

From in or around September 5, 2023, through on or about September 12, 2023, in Middlesex, Union, and Essex Counties, in the District of New Jersey and elsewhere, the defendants,

AHMAD SINGLETARY and JOSEPH YOUNG,

did knowingly and willfully conspire and agree with each other and others, to obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, and by committing and threatening force, violence, and fear of injury, immediate and future, to the person and property of another.

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

COUNT TWO

(Conspiracy to Use and Carry a Firearm During and in Relation to a Crime of Violence)

From in or around September 5, 2023, through on or about September 12, 2023, in Middlesex, Union, and Essex Counties, in the District of New Jersey and elsewhere, the defendants,

AHMAD SINGLETARY and JOSEPH YOUNG,

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 Hobbs Act robbery offenses charged in Counts Three, Four, Six, Seven, Eight, Nine, and Ten of this Complaint, did knowingly and intentionally conspire and agree with each other and others to use and carry a firearm, which firearm was brandished, contrary to Title 18, United States Code, Section 924(c).

In violation of Title 18, United States Code, Section 924(o).

COUNT THREE

(Hobbs Act Robbery)

On or about September 5, 2023, in Middlesex County, in the District of New Jersey, and elsewhere, the defendants,

AHMAD SINGLETARY and JOSEPH YOUNG,

did knowingly and willfully obstruct, delay and affect commerce, and attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force, violence, and fear of injury, immediate or future, to the person or property of another, namely, an employee of a gas station in Woodbridge, New Jersey, in furtherance thereof, and did aid and abet the same.

COUNT FOUR

(Hobbs Act Robbery)

On or about September 5, 2023, in Union County, in the District of New Jersey, and elsewhere, the defendants,

AHMAD SINGLETARY and JOSEPH YOUNG,

did knowingly and willfully obstruct, delay and affect commerce, and attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force, violence, and fear of injury, immediate or future, to the person or property of another, namely, an employee of a gas station in Union, New Jersey, in furtherance thereof, and did aid and abet the same.

COUNT FIVE

(Using, Carrying, and Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about September 5, 2023, in Union County, in the District of New Jersey, and elsewhere, the defendants,

AHMAD SINGLETARY and JOSEPH YOUNG,

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 Hobbs Act Robbery charged in Count Four of this Complaint, did knowingly brandish and use a firearm, and did aid and abet the same.

COUNT SIX

(Hobbs Act Robbery)

On or about September 5, 2023, in Union County, in the District of New Jersey, and elsewhere, the defendants,

AHMAD SINGLETARY and JOSEPH YOUNG

did knowingly and willfully obstruct, delay and affect commerce, and attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force, violence, and fear of injury, immediate or future, to the person or property of another, namely, an employee of a gas station in Union, New Jersey, in furtherance thereof, and did aid and abet the same.

COUNT SEVEN

(Hobbs Act Robbery)

On or about September 12, 2023, in Middlesex County, in the District of New Jersey, and elsewhere, the defendants,

AHMAD SINGLETARY and JOSEPH YOUNG,

did knowingly and willfully obstruct, delay and affect commerce, and attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force, violence, and fear of injury, immediate or future, to the person or property of another, namely, an employee of a gas station in Woodbridge, New Jersey, in furtherance thereof, and did aid and abet the same.

COUNT EIGHT

(Hobbs Act Robbery)

On or about September 12, 2023, in Middlesex County, in the District of New Jersey, and elsewhere, the defendants,

AHMAD SINGLETARY and JOSEPH YOUNG,

did knowingly and willfully obstruct, delay and affect commerce, and attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force, violence, and fear of injury, immediate or future, to the person or property of another, namely, an employee of a gas station in Woodbridge, New Jersey, in furtherance thereof, and did aid and abet the same.

COUNT NINE

(Hobbs Act Robbery)

On or about September 12, 2023, in Middlesex County, in the District of New Jersey, and elsewhere, the defendants,

AHMAD SINGLETARY and JOSEPH YOUNG,

did knowingly and willfully obstruct, delay and affect commerce, and attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force, violence, and fear of injury, immediate or future, to the person or property of another, namely, an employee of a gas station in Woodbridge, New Jersey, in furtherance thereof, and did aid and abet the same.

COUNT TEN

(Hobbs Act Robbery)

On or about September 12, 2023, in Essex County, in the District of New Jersey, and elsewhere, the defendants,

AHMAD SINGLETARY and JOSEPH YOUNG,

did knowingly and willfully obstruct, delay and affect commerce, and attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force, violence, and fear of injury, immediate or future, to the person or property of another, namely, an employee of a gas station in West Orange, New Jersey, in furtherance thereof, and did aid and abet the same.

COUNT ELEVEN

(Using, Carrying, and Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about September 12, 2023, in Essex County, in the District of New Jersey, and elsewhere, the defendants,

AHMAD SINGLETARY and JOSEPH YOUNG,

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 Hobbs Act Robbery charged in Count Ten of this Complaint, did knowingly brandish and use a firearm, and did aid and abet the same.

COUNT TWELVE

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about September 25, 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

AHMAD SINGLETARY,

knowing that he had previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a firearm, namely, a Ruger 9 mm P95 handgun, bearing serial number 31835520, loaded with thirteen rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

ATTACHMENT B

I, Lyndsay LeBedda, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"). 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, video recordings, and the evidence. 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 statements of others are related herein, they are related in substance and part. 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.

Background of the Investigation

- 1. Law enforcement, including the ATF, has been investigating seven armed robberies of gas stations (the "Robberies") in Middlesex County, Union County, and Essex County, New Jersey. The Defendants utilized a similar approach for each of the Robberies, including only targeting gas stations on or near highways, using a firearm, committing the Robberies in the early morning, and performing the Robberies in approximately four minutes or less. Over the course of the investigation, as described herein, law enforcement has identified the defendants, Ahmad Singletary ("SINGLETARY") and Joseph Young ("YOUNG") (collectively, the "Defendants"), as the perpetrators of the following Robberies:
 - a. an armed robbery of a gas station in Woodbridge ("Gas Station-1") on or about September 5, 2023 ("Robbery-1");
 - b. an armed robbery of a gas station in Union ("Gas Station-2") on or about September 5, 2023 ("Robbery-2");
 - c. an armed robbery of a gas station in Union ("Gas Station-3") on or about September 5, 2023 ("Robbery-3");
 - d. an armed robbery of a gas station in Woodbridge (Gas Station-4") on or about September 12, 2023 ("Robbery-4");
 - e. an armed robbery of a gas station in Woodbridge ("Gas Station-5") on or about September 12, 2023 ("Robbery-5");
 - f. an armed robbery of Gas Station-1 in Woodbridge on or about September 12, 2023 ("Robbery-6"); and
 - g. an armed robbery of a gas station in West Orange ("Gas Station-6") on or about September 12, 2023. ("Robbery-7")

- 2. During the investigation, law enforcement learned that a white Audi A4 with New Jersey license plate "R80MZR" (the "Audi") was used in the course of the three robberies on September 5, 2023, and a black BMW 430i with New Jersey license plate "P42RZX" (the "BMW") was used in the course of the four robberies on September 12, 2023.
- 3. During the course of the investigation, law enforcement identified the cellphone number used by SINGLETARY and pursuant to lawfully executed search warrants, law enforcement obtained historical cell site location information ("location data") associated with SINGLETARY's phone. As discussed in more detail below, the location data places SINGLETARY's Phone near most of the Robberies close to the time of those Robberies.

September 5, 2023 Robberies

Robbery-1

4. On or about September 5, 2023, at approximately 1:39 a.m., the Defendants arrived in the Audi at Gas Station-1, located at the Colonia North Service Area on the Garden State Parkway in Woodbridge. Surveillance video shows an individual subsequently identified as YOUNG exiting from the front passenger door of the Audi wearing a black ski mask, black t-shirt with a large Nike "Swoosh" logo displayed in white, black pants, and grey gloves. The rear of YOUNG's pants are below his waist revealing multi colored boxer underwear. An individual subsequently identified as SINGLETARY is shown exiting from the rear right passenger door of the Audi holding a black handgun in his right hand and wearing a black ski mask, black hooded sweatshirt (with a small white logo believed to be Nike Swoosh in left chest area) with his hood on, and black pants. A white t-shirt is observed partially sticking out from underneath SINGLETARY's hooded sweatshirt. The driver ("Co-conspirator-1") did not exit the Audi. The Defendants pushed two gas station attendants ("Victim-1" and "Victim-2") into the service booth and demanded money and phones. YOUNG physically struggled with Victim-1, before SINGLETARY struck Victim-1 in the head with the handgun, causing a deep laceration to Victim-1's forehead, and then took Victim-1's cell phone, approximately \$800, and Victim-1's Medicare card. The Defendants took approximately \$187 from Victim-2. The Defendants then returned to the Audi and drove away northbound, approximately one minute and 20 seconds after arriving.

Robbery-2

5. At approximately 1:54 a.m., the Defendants arrived in the Audi at Gas Station-2, located on US Highway 22 in Union. Surveillance video shows the gas station attendant ("Victim-3") approach the Audi and then Defendants exiting the Audi wearing the same clothes as Robbery-1 and sitting in the same seats. SINGLETARY pointed a black handgun at Victim-3, grabbed Victim-3 by

the collar of his shirt, and directed him into the gas station convenience store. At the same time, the Audi backed up to the front door where YOUNG exited the Audi and entered the convenience store. The driver, Co-conspirator-1, did not exit the Audi. Inside the store, SINGLETARY brought Victim-3 behind the counter where SINGLETARY forced him to unlock the cash register drawer and YOUNG began to empty the contents of the register. SINGLETARY then struck Victim-3 in the head with the handgun multiple times, causing a broken nose, a chipped tooth, and a head laceration. The Defendants then rummaged through cabinets that were located behind the counter. The Defendants then returned to their same seats in the Audi, and drove away westbound, approximately four minutes after arriving.

6. According to lawfully obtained cell phone location data, SINGLETARY's Phone connected to a cellular tower located in Union approximately one block from the locations of Robbery-2 and Robbery-3, described in detail in the next paragraph, twice 30 seconds apart, at 1:57 a.m., approximately three minutes into the commission of Robbery-2.

Robbery-3

- 7. At approximately 2:01 a.m. the Defendants arrived in the Audi at Gas Station-3, located at the Whitney Houston Service Area on the Garden State Parkway in Union. Surveillance video shows the gas station attendant ("Victim-4") approach the Audi, and the Defendants get out wearing the same clothes as Robbery-1 and Robbery-2. The driver, Co-conspirator-1, did not exit the Audi. SINGLETARY pointed a black handgun at Victim-4 and pushed him into the service booth, demanding money and his cell phone. The Defendants took approximately \$600 and Victim-4's cell phone. Victim-4's wife ("Victim-5") and daughter were sitting in a car outside the service booth and when Victim-5 started to call 911, SINGLETARY approached her and took her phone. The Defendants then returned to their same seats in the Audi, and drove away northbound, approximately two minutes after arriving.
- 8. At approximately 10:37 a.m., law enforcement found the Audi abandoned on Glorieux Street in Irvington, NJ after being involved in a multijurisdictional pursuit with Newark Police Department. Video surveillance shows YOUNG exiting the driver seat of the Audi, wearing the same clothes as the Robberies approximately eight hours before. YOUNG removed his ski mask while running away from vehicle. A still shot image of the suspect's face, shown below as Figure 1, was ultimately obtained from video surveillance around the corner on Stuyvesant Avenue in Irvington. Law enforcement obtained the driver's license information, including photo, for YOUNG from the New Jersey Division of Motor Vehicles ("DMV"). Law enforcement compared YOUNG's DMV photograph with the image of the individual in the still shot photo who abandoned the Audi. The individual who abandoned the Audi appears consistent with the individual in the DMV photograph of YOUNG.

Figure 1



9. Law enforcement subsequently processed the Audi for forensic evidence, including collecting a plastic Gatorade bottle from the passenger seat. Law enforcement swabbed the bottle for a DNA sample. The New Jersey State Police Office of Forensic Sciences concluded that the DNA sample obtained from

the bottle indicated a possible DNA association with the DNA for YOUNG. Additionally, law enforcement lifted a latent fingerprint from inside the Audi, which the New Jersey State Police Biometric Identification Unit concluded matched the fingerprints of YOUNG.

September 12, 2023 Robberies

Robbery-4

- 10. On or about September 12, 2023, at approximately 3:03 a.m., the Defendants arrived in the BMW at Gas Station-4, located on Route 27 in Woodbridge. Surveillance video shows the gas station attendant ("Victim-6") approach the BMW and an individual subsequently identified as SINGLETARY exiting from the front passenger door of the BMW pointing a black handgun at Victim-6. The video is black and white but appears to show SINGLETARY wearing the same clothes as during Robbery-1, Robbery-2, and Robbery-3. The driver, identified as YOUNG by his own admission to law enforcement on September 14, 2023, did not exit the BMW. SINGLETARY pushed Victim-6 into the service booth and demanded money and Victim-6's phone. SINGLETARY took approximately \$370 and Victim-6's cell phone. SINGLETARY then returned to the same seat in the BMW, which drove away northbound, approximately two minutes after arriving.
- 11. According to lawfully obtained cell phone location data, SINGLETARY's Phone connected to a cellular tower located in Woodbridge approximately 0.3 miles from the location of Robbery-4, at 3:05 a.m., approximately as Robbery-4 was finishing and one minute prior to Robbery-5.

Robbery-5

- 12. At approximately 3:06 a.m. the Defendants arrived in the BMW at Gas Station-5, located at the Colonia North Service Area on the Garden State Parkway in Woodbridge. Surveillance video shows the gas station attendant ("Victim-7") approach the BMW and SINGLETARY exiting from the front passenger door of the BMW and pointing a black handgun at Victim-7's chest. SINGLETARY is wearing the same clothes as the earlier Robberies. The driver, YOUNG, did not exit the BMW. SINGLETARY immediately demanded whatever Victim-7 had and took approximately \$146 from Victim-7's person. SINGLETARY then returned to the same seat in the BMW, which drove away northbound, approximately 45 seconds after arriving.
- 13. According to lawfully obtained cell phone location data, SINGLETARY's Phone connected to a cellular tower located in Woodbridge approximately 1.4 miles from the location of Robbery-5, at 3:06 a.m., approximately as Robbery-5 was beginning.

Robbery-6

- 14. At approximately 3:07 a.m. the Defendants arrived in the BMW at Gas Station-1, also located at the Colonia North Service Area on the Garden State Parkway in Woodbridge. Surveillance video shows SINGLETARY exiting from the front passenger door of the BMW and immediately pushing the gas station attendant ("Victim-8") into the service booth. SINGLETARY is wearing the same clothes as the earlier Robberies. The driver, YOUNG, did not exit the BMW. SINGLETARY struck Victim-8 in the head with a handgun multiple times, causing a laceration, took approximately \$199 from Victim-8's person and Victim-8's cell phone. SINGLETARY then returned to the same seat in the BMW and drove away northbound, approximately 45 seconds after arriving.
- 15. According to lawfully obtained cell phone location data, SINGLETARY's Phone connected to a cellular tower located in Woodbridge approximately 1.1 miles from the location of Robbery-6, at 3:09 a.m., approximately one minute after Robbery-6. Between 3:10 a.m., approximately two minutes after Robbery-6, and 3:38 a.m., one minute before Robbery-7, SINGLETARY's Phone connected approximately 15 times to multiple cellular towers located along the Garden State Parkway and I-280 on the same route as the most direct drive between the locations of Robbery-6 and Robbery-7.

Robbery-7

- 16. At approximately 3:39 a.m. the Defendants arrived in the BMW at Gas Station-6, located on Main Street in West Orange. Surveillance video shows SINGLETARY exiting from the front passenger door of the BMW and pointing a black handgun at two gas station attendants ("Victim-9" and "Victim-10"), demanding money and forcing them to lay on the ground. SINGLETARY is wearing the same clothes as the earlier Robberies. The driver, YOUNG, did not exit the BMW. SINGLETARY then pointed the gun at two individuals ("Victim-11" and "Victim-12") who were sitting in a vehicle waiting for fuel and took phones and car keys from them. SINGLETARY then ordered Victim-9 into the service booth to retrieve more money from the register. SINGLETARY then struck Victim-9 in the head with a handgun and punched him in the head with a closed fist, causing a laceration. In total, SINGLETARY took approximately \$1,000 from Victim-9 and Victim-10 and the cash register. SINGLETARY then returned to the same seat in the BMW, which drove away northbound, approximately four minutes after arriving.
- 17. According to lawfully obtained cell phone location data, SINGLETARY's Phone connected to a cellular tower located in West Orange approximately 0.2 miles from the location of Robbery-7, at 3:39 a.m., approximately as Robbery-7 was beginning. SINGLETARY'S Phone connected to another cellular tower located in West Orange approximately 200 feet from the

location of Robbery-7, at approximately 3:41 a.m., two minutes into the commission of Robbery-7.

The Continued Investigation

- 18. On or about September 13, 2023, at approximately 10:49 am, members of the Newark Police Department were involved in an unrelated motor vehicle pursuit of a black Chevrolet sedan. During the course of Newark's pursuit of the Chevrolet sedan, the black 2023 BMW 430i bearing New Jersey registration P42RZX, described above and used in the commission of Robberies-4 through 7, was observed within the area of Grove Street and Ferdinand Street to have crashed and overturned. Newark patrol officers then observed YOUNG exiting the BMW attempting to flee the scene on foot. YOUNG was subsequently placed under arrest. YOUNG advised the officers that his cell phone was inside the vehicle.
- 19. On or about September 14, 2023, YOUNG provided an audio-and-video-recorded statement to law enforcement after waiving his <u>Miranda</u> rights in writing. YOUNG informed law enforcement that he was the individual described above in the black ski mask, black t-shirt with a large Nike "Swoosh" logo displayed in white, black pants, and grey gloves in the three Robberies on September 5, 2023, and that he was the driver of the BMW during all four robberies on September 12, 2023.
- 20. Pursuant to a lawfully executed search warrant of YOUNG's cell phone, law enforcement discovered a contact name of "Mody.z6" assigned to a phone number ending in 2473, subsequently identified as SINGLETARY's phone number. Additionally, the number had a contact photo associated to it. The contact photo displayed was of SINGLETARY posing alongside YOUNG. An open-source search of a law enforcement database revealed that the phone number ending in 2473 was, in fact, associated with SINGLETARY.
- 21. The investigation has revealed that the white Audi described above, was reported stolen out of Shrewsbury, New Jersey on September 1, 2023, and was used in the course of attempted motor vehicle thefts in Summit, New Jersey on September 3, 2023. Summit Police learned that a credit card was taken from inside of one of the vehicles and used on September 3, 2023, at a shoe store ("Business-1"), located in Irvington, New Jersey. Video surveillance footage from Business-1 was obtained during the time the stolen credit card was utilized to obtain a still shot photo of one of the suspects, shown below as Figure 2. Law enforcement obtained the driver's license information, including photo, for SINGLETARY from the New Jersey DMV. Law enforcement compared SINGLETARY's DMV photograph with the image of the individual in the still shot photo at Business-1 using the stolen credit card. The individual in Business-1 appears consistent with the individual in the DMV photograph of SINGLETARY.



22. On or about the evening of September 25, 2023, law enforcement in Irvington, New Jersey observed SINGLETARY was the sole occupant of a vehicle that had been reported stolen. Law enforcement took Singletary who was carrying a fanny bag, into custody. Officers recovered from the fanny bag a loaded Ruger 9mm handgun (black with a silver barrel) with a high-capacity magazine. This handgun was distinctively similar to the handgun observed via surveillance in the Robberies, as seen in the photos below. Prior to being possessed on September 25, 2023, the Ruger 9mm handgun was manufactured outside of the State of New Jersey, and thus moved in and affected interstate commerce.

Photos of handgun recovered from SINGLETARY on September 25, 2023





Screenshot from Robbery-7

Screenshot from Robbery-2





- 23. Prior to knowingly possessing the firearm, SINGLETARY knew he was a convicted felon as he had served a three-year prison term following his conviction on October 26, 2021, in the Superior Court of New Jersey, Morris County, for Receiving Stolen Property, in violation of N.J.S.A. 2C:120-7(a).
- 24. On or about September 25, 2023, SINGLETARY provided audio-and-video-recorded statements after waiving his <u>Miranda</u> rights in writing. SINGLETARY informed law enforcement that he was the individual with the gun during Robbery-3 on September 5, 2023, but claimed it was a metal pellet BB gun and denied being involved in Robbery-1 and Robbery-2, even though video surveillance shows that the same individual wearing the exact same clothing is holding the handgun in all three September 5, 2023 Robberies. SINGLETARY also stated that he was involved in at least one robbery on September 12, 2023 involving the black BMW, but stated he was not involved in any robberies where someone was pistol whipped or hurt.

* * * *

25. During the investigation, law enforcement learned that Gas Station-1, Gas Station-2, Gas Station-3, Gas Station-4, Gas Station-5, and Gas Station-6 ordered and sold inventory from out-of-state suppliers and processed payments through interstate credit card companies.