

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

UNITED STATES OF AMERICA	:	<b>CRIMINAL COMPLAINT</b>
	:	
v.	:	Hon. James B. Clark, III, U.S.M.J.
	:	
AHMAD FRANKS, a/k/a "Mahdi,"	:	Mag. No. 24-12309
RYAN BOWEN, a/k/a "Prob,"	:	<b>FILED UNDER SEAL</b>
SHAQUAN WHITE, a/k/a "QBandz,"	:	
a/k/a "Q Bands,"	:	
ZAMIR WRIGHT, a/k/a "GBz,"	:	
KHYREE LAWRENCE, a/k/a "6,"	:	
NATHAN BRASWELL, a/k/a "Troub,"	:	
IBN BELLAMY, a/k/a "YC," and	:	
MOHAMMED BUHARI, a/k/a "Sakina"	:	

I, Special Agent Caroline Blanchard, 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**

*Caroline Blanchard*  
Caroline Blanchard, Special Agent  
Bureau of Alcohol, Tobacco, Firearms, and Explosives

Special Agent Blanchard attested to this Complaint by telephone pursuant to F.R.C.P. 4.1

November 1, 2024  
Date

at District of New Jersey  
County and State

HONORABLE JAMES B. CLARK, III  
UNITED STATES MAGISTRATE JUDGE

*Hon. James B. Clark, III*  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

*(Conspiracy to Receive, Possess, or Sell Stolen Vehicles)*

From in or around November 2021, through on or about February 28, 2023, in Essex County, in the District of New Jersey, and elsewhere, defendants

**AHMAD FRANKS,  
a/k/a “Mahdi,”  
RYAN BOWEN,  
a/k/a “Prob,”  
SHAQUAN WHITE,  
a/k/a “QBandz,”  
a/k/a “Q Bands,”  
ZAMIR WRIGHT,  
a/k/a “GBz,”  
KHYREE LAWRENCE,  
a/k/a “6,”  
NATHAN BRASWELL,  
a/k/a “Troub,”  
IBN BELLAMY,  
a/k/a “YC,” and  
MOHAMMED BUHARI,  
a/k/a “Sakina,”**

knowingly and intentionally conspired with each other and others to receive, possess, conceal, store, barter, sell, and dispose of motor vehicles, which had crossed State boundaries after being stolen, knowing the same to have been stolen, contrary to Title 18, United States Code, Section 2313.

In violation of Title 18, United States Code, Section 371.

**COUNT TWO**

*(Sale, Receipt, or Possession of a Stolen Vehicle)*

Between on or about November 15, 2021, and on or about November 17, 2021, in Essex County, in the District of New Jersey, and elsewhere, defendants

**AHMAD FRANKS,  
a/k/a “Mahdi,” and  
MOHAMMED BUHARI,  
a/k/a “Sakina,”**

knowingly and intentionally received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2021 Audi Q5 bearing a New Jersey registration ending in PBD and with the last four digits of the true Vehicle Identification Number assigned to that vehicle being 4179, which had crossed State boundaries after being stolen, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2313 and Section 2.

**COUNT THREE**

*(Possession of a Stolen Vehicle)*

Between on or about April 27, 2022, and on or about May 17, 2022, in Essex County, in the District of New Jersey, and elsewhere, defendant

**IBN BELLAMY,  
a/k/a “YC,”**

knowingly and intentionally received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2020 Land Rover Range Rover bearing a New Jersey registration ending in MDJ and with the last four digits of the true Vehicle Identification Number assigned to that vehicle being 0940, which had crossed State boundaries after being stolen, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2313 and Section 2.

**COUNT FOUR**

*(Interstate Transportation of a Stolen Vehicle)*

Between on or about June 27, 2022, and on or about June 28, 2022, in Essex County, in the District of New Jersey, and elsewhere, defendant

**AHMAD FRANKS,  
a/k/a “Mahdi,”**

did knowingly transport in interstate commerce a motor vehicle, namely, a 2022 BMW M8 Competition, with the last four digits of the true Vehicle Identification Number assigned that vehicle being 8158, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2312 and Section 2.

**COUNT FIVE**

*(Possession of a Stolen Vehicle)*

Between on or about July 2, 2022, and on or about July 8, 2022, in Essex County, in the District of New Jersey, and elsewhere, defendant

**AHMAD FRANKS,  
a/k/a “Mahdi,”**

knowingly and intentionally received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2021 Land Rover Range Rover, with the last four digits of the true Vehicle Identification Number assigned to that vehicle being 0557, which had crossed State boundaries after being stolen, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2313 and Section 2.

**COUNT SIX**

*(Possession of a Stolen Vehicle)*

Between on or about July 3, 2022, and on or about July 8, 2022, in Essex County, in the District of New Jersey, and elsewhere, defendant

**AHMAD FRANKS,  
a/k/a “Mahdi,”**

knowingly and intentionally received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2021 BMW M3, with the last four digits of the true Vehicle Identification Number assigned to that vehicle being 9133, which had crossed State boundaries after being stolen, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2313 and Section 2.

**COUNT SEVEN**

*(Possession of a Stolen Vehicle)*

Between on or about July 3, 2022, and on or about July 8, 2022, in Essex County, in the District of New Jersey, and elsewhere, defendant

**AHMAD FRANKS,  
a/k/a “Mahdi,”**

knowingly and intentionally received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2020 BMW M8, with the last four digits of the true Vehicle Identification Number assigned to that vehicle being 0452, which had crossed State boundaries after being stolen, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2313 and Section 2.



**COUNT EIGHT**

*(Possession of a Stolen Vehicle)*

Between on or about July 6, 2022, and on or about July 8, 2022, in Essex County, in the District of New Jersey, and elsewhere, defendant

**AHMAD FRANKS,  
a/k/a “Mahdi,”**

knowingly and intentionally received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2021 BMW X7, with the last four digits of the true Vehicle Identification Number assigned to that vehicle being 8483, which had crossed State boundaries after being stolen, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2313 and Section 2.

## **ATTACHMENT B**

I, Caroline Blanchard, 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, and photographs of the 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. All times are approximations.

1. Since in or around November 2021, the ATF, Homeland Security Investigations (“HSI”) and state and local law enforcement (collectively, “law enforcement”) have been investigating a series of high-end car thefts that occurred in New Jersey, New York, and elsewhere. During the course of the investigation, law enforcement learned that Ahmad Franks, a/k/a “Mahdi” (“FRANKS”), Ryan Bowen, a/k/a “Prob” (“BOWEN”), Shaquan White, a/k/a “QBandz,” a/k/a “Q Bands” (“WHITE”), Zamir Wright, a/k/a “GBz” (“WRIGHT”), Khyree Lawrence, a/k/a “6” (“LAWRENCE”), Nathan Braswell, a/k/a “Troub” (“BRASWELL”), Ibn Bellamy, a/k/a “YC” (“BELLAMY”), and Mohammed Buhari, a/k/a “Sakina” (“BUHARI”) (collectively, “Defendants”) and others known and unknown (collectively, the “Co-conspirators”) conspired with each other and others to possess, receive, conceal, sell, dispose, and/or transport high-value stolen cars in New York, New Jersey, Pennsylvania, Maryland, Virginia, and elsewhere. The investigation has revealed that some of the stolen cars were used during the commission of other crimes, including the theft of additional cars, shootings, and a homicide.

2. The investigation has included surveillance; open public records searches; reviews of social media accounts; court-authorized collection and review of phone data, including analysis of photographs, location data, messages, and browsing history; automated license plate reader (“ALPR”) data;<sup>1</sup> and the execution of search warrants, among other lawful means of investigation.

3. The investigation has revealed, for example, that between November 2021 through July 2022, a cell phone recovered from FRANKS during a July 8, 2022 arrest (“Franks’s Cell Phone”) exchanged photographs of at least 400 known or suspected stolen cars with at least a dozen Co-conspirators. And on or about October

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<sup>1</sup> ALPRs are high-speed, computer-controlled camera systems that are typically mounted on street poles, streetlights, highway overpasses, mobile trailers, or attached to police squad cars. ALPRs automatically capture all license plate numbers that come into view, along with the location, date, and time. The data, which includes photographs of the car and sometimes its driver and passengers, is then uploaded to a central server. Once a car is entered into the law enforcement database, ALPR alerts law enforcement every time the car hits a nearby plate reader.

13, 2022, during the execution of a search warrant at a residence associated with BELLAMY, WRIGHT, and a third occupant, law enforcement seized two loaded firearms, approximately 15 rounds of ammunition, key fobs belonging to two Mercedes-Benzes and a stolen BMW (none of which were registered to any of the Co-conspirators), and a driver's license belonging to the victim of an attempted car theft that occurred on or about July 20, 2022.<sup>2</sup>

**2021 Audi Q5, Stolen from Jersey City, New Jersey, on November 15, 2021**

4. On or about November 15, 2021, a 2021 Audi Q5 bearing a New Jersey registration ending in PBD and assigned Vehicle Identification Number ("VIN") ending in 4179 (the "2021 Audi Q5") was reported stolen to the Jersey City Police Department from an address in or around Jersey City, New Jersey. Two days later, on or about November 17, 2021, Franks's Cell Phone exchanged multiple text messages on an encrypted messaging platform with an account associated with BUHARI in which they negotiated the price of the 2021 Audi Q5 and three other confirmed stolen cars: an Audi Q7, a Range Rover, and a BMW X4M.<sup>3</sup> FRANKS also sent BUHARI photographs of all four cars, including photographs depicting the license plate of the 2021 Audi Q5.<sup>4</sup> After the two agreed on a price (which included \$17,000 in cash and \$500 through a digital wallet service that allows users to send and receive money), BUHARI sent FRANKS a Pennsylvania address to complete the transaction. In later text communications between BUHARI and FRANKS, FRANKS informed BUHARI of his location in Pennsylvania by sending a map with a pin alerting BUHARI to his imminent arrival and a photo of a parking lot a short distance from the Pennsylvania address BUHARI provided.

5. New Jersey highway data and ALPR data confirmed that the 2021 Audi Q5 was in Newark, New Jersey, as late as approximately 11:40 a.m., on November 17, 2021 (the day of FRANKS's text exchanges with BUHARI). By approximately 1:18 p.m., consistent with FRANKS's messages to BUHARI, the 2021 Audi Q5 traveled from New Jersey into Pennsylvania.

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<sup>2</sup> The July 20, 2022 attempted car theft was unsuccessful because the suspects exited the car after discovering a large dog inside it. During their hurried escape, however, one of the suspects left behind in the car a cell phone that had a photograph of WRIGHT as the phone's background.

<sup>3</sup> The Audi Q7 was reported stolen to the Howell Township Police Department in New Jersey on or about November 16, 2021. The Range Rover was reported stolen to the Howell Township Police Department in New Jersey on or about November 15, 2021. The BMW X4M was reported stolen to the Tenafly Police Department in New Jersey on or about November 16, 2021.

<sup>4</sup> An analysis of Franks's Cell Phone revealed that between November 7, 2021 and July 3, 2022, FRANKS and BUHARI exchanged photographs of approximately 105 known or suspected stolen cars.

6. Consistent with their exchange, a review of records revealed that FRANKS received \$500 in his digital wallet account from “M Buhari” at approximately 2:20 p.m., on or about November 17, 2021. After its sale in Pennsylvania, the 2021 Audi Q5 was last detected near Kingsville, Maryland. To date, the car remains stolen.

### **2020 Range Rover, Stolen from Tenafly, New Jersey, on April 27, 2022**

7. On or about April 27, 2022, a 2020 Land Rover Range Rover bearing a New Jersey registration ending in MDJ and assigned VIN ending in 0940 (the “2020 Range Rover”) was reported stolen to the Tenafly Police Department from an address in or around Tenafly, New Jersey, between 6:30 p.m. and 10:30 p.m.

8. Law enforcement lawfully reviewed the data of a cell phone belonging to BELLAMY (“Bellamy’s Cell Phone”), which revealed that BELLAMY had photographs of the 2020 Range Rover created shortly after it was reported stolen (including a photograph of its New Jersey registration card that appeared to be taken inside the car and which listed the owner, registration number, and VIN), screenshots of a suspected text conversation discussing the 2020 Range Rover with Co-conspirator-1 (“CC-1”), and an audio recording discussing the sale of an unidentified 2020 car for at least \$7,000.

9. Among the photographs recovered from Bellamy’s Cell Phone were three of the 2020 Range Rover, which were all created at 10:38 p.m.—potentially minutes after the car theft. Two of the photographs clearly depicted the license plate of the 2020 Range Rover. Further, law enforcement recognized the location depicted in those photographs as an area near Passaic Street in Newark, New Jersey. Law enforcement recognized that area based on experience and because that location was later used as the burn site for a separate stolen car that was involved in a multiple-victim shooting in which one of the victims was killed. Specifically, on or about March 2, 2022, a 2022 Hyundai Palisade bearing a New Jersey temporary registration ending in 940 and assigned VIN ending in 4092 (the “2022 Hyundai Palisade”) was reported stolen to the Hillside Police Department. The Co-conspirators stole the car around 9:30 a.m. Approximately two hours later, at around 11:30 a.m., FRANKS sent two photographs of the 2022 Hyundai Palisade to several of the Co-conspirators in an attempt to sell it. He then sent additional photographs to other Co-conspirators throughout the day. At approximately 10:24 p.m. that evening, however, the 2022 Hyundai Palisade was used in a Newark shooting in which three people were shot, one of whom was killed. And at approximately 10:50 p.m., law enforcement recovered the 2022 Hyundai Palisade, set on fire, near Passaic Street in Newark, New Jersey. Once the fire was extinguished, law enforcement recovered a fired cartridge (consistent with the earlier shooting) inside the car.

10. Law enforcement recovered the 2020 Range Rover on or about May 17, 2022, at the port in Baltimore, Maryland, in a shipping container destined for Accra, Ghana.

**2021 BMW X5, Stolen from East Brunswick, New Jersey, on June 17, 2022**

11. On or about June 17, 2022, a 2021 BMW X5 bearing a New Jersey registration ending in NEF and assigned VIN ending in 5594 (the “2021 BMW X5”) was reported stolen to the East Brunswick Police Department from an address in or around East Brunswick, New Jersey, at approximately 3:59 p.m.

12. Within one hour of the theft, at approximately 4:50 p.m., FRANKS sent to CC-1 three photographs (one of which is included below) depicting a BMW X5. FRANKS also sent CC-1 a photograph of the 2021 BMW X5’s New Jersey registration, showing the car’s VIN and license plate number. The two negotiated the sale of the 2021 BMW X5, and FRANKS agreed to deliver the car to the Bronx, New York. Through previous knowledge of the area and the sign visible in the background of the below photograph, law enforcement identified that at least one of the photographs was taken in Hillside, New Jersey. Moreover, law enforcement believes that FRANKS took the below photograph (and likely the others) because the distinctive tattoo in the forearm depicted in the below photograph matches those on FRANKS’s forearm, which law enforcement obtained from his publicly available social media account.



13. Between 6:17 p.m. and 7:40 p.m., FRANKS called CC-1 four times. Consistent with FRANKS’s communications, ALPR data showed that the 2021 BMW X5 traveled from Hillside, New Jersey, and arrived in the Bronx, New York, at approximately 7:24 p.m. The next day, on or about June 18, 2022, CC-1 called FRANKS multiple times and followed up by text, notifying FRANKS that “[t]hey towed the [2021 BMW X5]” and that its “[b]ad business.”

14. Law enforcement recovered the 2021 BMW X5 on or about October 18, 2022, in a shipping container at the port in Norfolk, Virginia.

### **2022 BMW M8, Stolen from Flushing, New York, on June 27, 2022**

15. On or about June 27, 2022, at approximately 9:21 p.m., FRANKS conducted an internet search for “million dollar homes in great neck.” FRANKS then visited a website advertising luxury homes in the Great Neck, New York area. Approximately twenty minutes later, at around 9:49 p.m., location data from Franks’s Cell Phone placed the device at or around Northern Boulevard, in Little Neck, New York (approximately 3.5 miles from Great Neck). And just five minutes later, at around 9:55 p.m., a 2022 BMW M8 Competition convertible bearing a New York registration ending in 548 and assigned VIN ending in 8158 (the “2022 BMW M8”) was reported stolen to the New York Police Department from an address at or around Northern Boulevard—near the location of Franks’s Cell Phone in Little Neck.

16. Following the 2022 BMW M8’s theft, location data from Franks’s Cell Phone and ALPR data showed that the stolen BMW M8 and Franks’s Cell Phone traveled from New York into New Jersey.

17. Later that evening, FRANKS took multiple photographs of the 2022 BMW M8 and its insurance identification card depicting its VIN. Location data from Franks’s Cell Phone and ALPR data showed that the stolen car and Franks’s Cell Phone continued to travel in tandem in New Jersey. FRANKS then disseminated those photographs to some of his Co-conspirators, including Co-Conspirator-2 (“CC-2”) and Co-Conspirator-3 (“CC-3), wherein he attempted to sell the 2022 BMW M8 for \$15,000.

18. The next day, on or about June 28, 2022, law enforcement recovered the 2022 BMW M8 in West Orange, New Jersey. Location data from Franks’s Cell Phone showed that it was located approximately 650 feet from where law enforcement recovered the 2022 BMW M8.

### **2018 Audi RS5, Stolen from Ridgewood, New Jersey, and 2021 Black Range Rover, Stolen from Cranford, New Jersey, on July 1, 2022**

19. On or about July 1, 2022, at approximately 7:15 a.m., a 2018 Audi RS5 bearing a New Jersey Registration ending in PCS and assigned VIN ending in 2636 (the “2018 Audi RS5”) was reported stolen to the Ridgewood Police Department from an address in or around Ridgewood, New Jersey. Between 6:42 a.m. and 7:53 a.m. that day, the 2018 Audi RS5 was detected multiple times in Newark, New Jersey.

20. Later that morning, at approximately 10:06 a.m., a black 2021 Land Rover Range Rover bearing New Jersey registration ending in NEH and assigned VIN ending in 1642 (the “2021 Black Range Rover”) was reported stolen to the Cranford Police Department from an address in or around Cranford, New Jersey. Law enforcement determined that the actors that stole the 2021 Black Range Rover arrived in the 2018 Audi RS5. After the theft of the 2021 Black Range Rover, ALPRs detected the two cars traveling in tandem in New Jersey and New York.

21. The 2018 Audi RS5 and the 2021 Black Range Rover were detected simultaneously in Newark between 10:18 a.m. and 10:40 a.m. And at 10:48 a.m., FRANKS received seven photographs on Franks's Cell Phone—four photographs of the 2018 Audi RS5 and three photographs of the 2021 Black Range Rover—from an account on an encrypted-messaging platform believed to be used by BOWEN.

22. In an effort to sell the cars, FRANKS immediately disseminated the seven photographs to other Co-conspirators, including CC-2 and Co-conspirator-4 ("CC-4"). CC-2 and CC-4 agreed to purchase the cars and provided FRANKS with a Bronx address at which FRANKS could deliver them.<sup>5</sup>

23. About a half hour later, at approximately 1:39 p.m., the 2018 Audi RS5 and the 2021 Black Range Rover were detected traveling from New Jersey to the Bronx, New York. Around 1:45 p.m., Franks's Cell Phone searched a maps application for the Bronx address provided by CC-2 and CC-4 earlier.

24. At approximately 4:48 p.m., Franks's Cell Phone received a message from Co-conspirator-6 ("CC-6") stating, "How much you took from that range?" FRANKS responded, "500, Prob 500,<sup>6</sup> Tyke 500, and 1000 for Gwild and lil Kent."

25. The 2018 Audi RS5, which made its way back into New Jersey later that day, was recovered by law enforcement in Irvington, New Jersey, on or about July 2, 2022. The 2021 Black Range Rover remains stolen.

### **2021 Blue Range Rover, Stolen from Viola, New York, on July 2, 2022**

26. On July 2, 2022, a blue 2021 Land Rover Range Rover bearing a New York registration ending in 970 and assigned VIN ending in 0557 (the "2021 Blue Range Rover") was reported stolen to the Ramapo Police Department from an address in or around Viola, New York, between 3:30 p.m. and 11:00 p.m.

27. Around 10:56 p.m., FRANKS took seven "live" photographs of the 2021 Blue Range Rover in the vicinity of McCarter Highway in Newark, New Jersey.<sup>7</sup> One of those photographs showed a placard on the dashboard that identifies the license plate number of the car. Another photograph showed a gloved fist covering the car's rear license plate. The photograph, however, revealed a distinctive tattoo on the individual's left forearm that is consistent with FRANKS's left-forearm tattoo. At

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<sup>5</sup> During this time, BOWEN continued to send Franks photographs of other stolen cars, including photographs of a stolen 2020 BMW 330 bearing a New Jersey registration and a stolen 2021 BMW X5 bearing a New York registration.

<sup>6</sup> As noted above, "Prob" is an alias for BOWEN.

<sup>7</sup> "Live" photographs are 1.5-second videos that capture the moments just before and after hitting the shutter button.

approximately 10:58 p.m., FRANKS disseminated six photographs of the 2021 Blue Range Rover to his Co-conspirators, including CC-2 and CC-4.

28. The 2021 Blue Range Rover (which is suspected of being used to steal a 2021 BMW M3 on or about July 3, 2022) remains stolen.

**2021 BMW M3, Stolen from Spring Lake, New Jersey, and  
2020 BMW M8, Stolen from Pomona, New York, on July 3, 2022**

29. On or about July 3, 2022, a 2021 BMW M3 bearing a New Jersey registration ending in NHY and assigned VIN ending in 9133 (the “2021 BMW M3”) was reported stolen to the Spring Lake Police Department from an address in or around in Spring Lake, New Jersey, at approximately 2:00 a.m. From camera footage, law enforcement identified that the Co-conspirators used a Range Rover to steal the 2021 BMW M3. About an hour later, at approximately 3:30 a.m., ALPRs detected the 2021 BMW M3 in Newark, New Jersey.

30. For the next two hours, Franks’s Cell Phone conducted multiple searches of luxury homes in the New York area nearing its border with New Jersey. For example, FRANKS conducted an internet search for “million dollar homes Montebello ny” at 4:21 a.m.; “million dollar homes suffern” at 4:23 a.m.; and “million dollar homes new city” at 5:46 a.m. Notably, at 5:45 a.m., Franks’s Cell Phone visited a real estate listing website for a home in Suffern, New York.

31. Soon after FRANKS conducted these searches, at approximately 6:02 a.m., a 2020 BMW M8 bearing New York registration ending in 206 and assigned VIN ending in 0452 (the “2020 BMW M8”) was reported stolen from a residence in Pomona, New York. The theft of the 2020 BMW M8 occurred approximately two miles away from the Suffern address that FRANKS had looked up just moments earlier. Additionally, camera footage revealed that the Co-conspirators used a car closely resembling the 2021 BMW M3 stolen from Spring Lake, New Jersey, to steal the 2020 BMW M8 in New York.<sup>8</sup> And when stealing the 2020 BMW M8, the driver hit two other parked cars in the process of driving it away.

32. Less than an hour later, between approximately 6:55 a.m. and 6:57 a.m., FRANKS took five live photographs of the 2020 BMW M8 (which was dented as a result of hitting two parked cars) and five live photographs of the 2021 BMW M3.<sup>9</sup> Metadata from Franks’s Cell Phone reveals that the photographs were taken in the vicinity of Irvington, New Jersey. FRANKS then sent those photographs to multiple

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<sup>8</sup> The 2020 BMW M8, stolen from Pomona, New York, was then used to steal a 2022 BMW X5 in Fair Lawn, New Jersey.

<sup>9</sup> The live photograph of the 2021 BMW M3 shows a partial license plate that is consistent with the license plate belonging to that car.



Co-conspirators (including LAWRENCE, CC-1, CC-2, and CC-4) and sought to sell the cars for \$10,000 each.

33. In addition to the ten live photographs of the two cars, Franks's Cell Phones revealed a video taken from the driver's seat of the 2020 BMW M8 that captures the 2021 BMW M3 (including its license plate) driving in front of it. And because the Co-conspirators had damaged the 2020 BMW M8 when stealing it, Franks's Cell Phone revealed internet searches for "why does m8 temperature go up when driving fast," "m8 coolant," "bmw coolant M8 2020," "bmw coolant reservoir," "where to add coolant M8 2020," "where does the coolant go on bmw 2020 M8," and "what tires fit on 2020 M8." In addition, Franks's Cell Phone had multiple photographs showing the damage to the 2020 BMW M8.

34. At approximately 4:35 p.m., Franks's Cell Phone captured a video depicting what appears to be the purchase of a facemask. Location data from Franks's Cell Phone revealed that the video was taken in the vicinity of a shopping mall in Paramus, New Jersey. ALPR data also revealed that the 2020 BMW M8 was detected near the intersection of Garden State Plaza Boulevard and Plaza Way, which is connected to the parking lot of a Paramus shopping mall, at approximately 4:44 p.m.

35. On July 5, 2022, the 2020 BMW M8 traveled from New Jersey to the Bronx as part of the sale of a stolen 2019 Range Rover summarized in paragraphs 37 through 41. The 2020 BMW M8 then returned to Newark, New Jersey; to date, it remains stolen.

36. On or about July 6, 2022, at approximately 12:16 a.m., Franks's Cell Phone created a video filming the 2021 BMW M3 in or around Newark and Irvington. Later that day, at approximately 12:51 p.m., the 2021 BMW M3 was detected crossing from New Jersey into the Bronx. Less than an hour later, at approximately 1:31 p.m., Franks's Cell Phone captured a photograph (reproduced on the next page) showing a hand holding a large quantity of cash in front of a steering wheel and a New Jersey inspection sticker, both of which resemble those of the 2021 BMW M3. Law enforcement recovered the 2021 BMW M3 without license plates in the Bronx, New York, on or about August 19, 2022.



### **2019 Range Rover, Stolen from Ridgewood, New Jersey, on July 5, 2022**

37. On or about July 5, 2022, a 2019 Land Rover Range Rover bearing a New Jersey registration ending in LGC and assigned VIN ending in 3429 (the “2019 Range Rover”) was reported stolen to the Ridgewood Police Department from an address in or around Ridgewood, New Jersey, at approximately 2:46 p.m.<sup>10</sup> At some point before 3:41 p.m., the Co-conspirators took the car to Hillside, New Jersey, where they abandoned the license plate and took photographs of the car using a cell phone.<sup>11</sup>

38. At approximately 3:54 p.m., FRANKS received three photographs of the 2019 Range Rover (depicting the license plate) from an account on an encrypted-messaging platform believed to be used by WHITE.<sup>12</sup>

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<sup>10</sup> Law enforcement received information describing the individual that stole the 2019 Range Rover as a man wearing a blue-hooded sweatshirt, blue sweatpants, a facemask, a hat, and white shoes.

<sup>11</sup> Camera footage from a nearby residence showed that one of the suspects wore a blue-colored sports suit and white sneakers while another suspect wore all black clothing.

<sup>12</sup> WHITE was arrested on state charges on or about March 17, 2023. During that arrest, law enforcement found WHITE in a stolen 2023 Land Rover Range Rover bearing a New York registration. On or about September 25, 2024, law enforcement executed a search warrant at WHITE’s residence in Newark, New Jersey, and recovered a 9mm Glock Model 19, bearing serial number BVHF621, loaded with 15 rounds of 9mm ammunition and equipped with an auto sear selector switch, which rendered the firearm capable of being fired in fully automatic mode. WHITE was charged by this Office with possession of a machine gun, in violation of 18 U.S.C. § 922(o)(1); and possession of an unregistered firearm, in violation of 26 U.S.C. § 5861(d). *See* Mag. No. 24-15171. Those charges remain pending.

39. At approximately 5:15 p.m., a social media account believed to be used by WRIGHT created a post containing a photograph of the interior of a Range Rover. The photograph included a New Jersey registration sticker ending in “4” and a New Jersey State Police sticker, which were identical to the stickers from the photographs of the 2019 Range Rover that WHITE sent to FRANKS.

40. At approximately 6:34 p.m., a social media account associated with WRIGHT posted a video depicting a man resembling WRIGHT wearing blue track pants, black shoes, a black jacket, and a face mask. The video also depicts a Range Rover that closely resembles the 2019 Range Rover.

41. FRANKS disseminated the photographs of the 2019 Range Rover to additional Co-conspirators to negotiate a sale. At approximately 4:22 p.m., FRANKS sent the photographs to CC-2 and CC-4, among others. FRANKS requested \$7,500 for the car and CC-2 responded “6k right now.” After a brief phone call with FRANKS, CC-4 sent FRANKS a Bronx address. FRANKS used his phone for directions to the Bronx address and, consistent with their exchange, the 2019 Range Rover was detected traveling from New Jersey to the Bronx that evening. At approximately 8:11 p.m., FRANKS texted CC-4, “We here.” And by 8:21 p.m., Franks’s Cell Phone created two videos that depict a hand holding \$100 bills, as shown in the screen capture below. To date, the 2019 Range Rover remains stolen.



### **2021 BMW 740i, Stolen from Great Neck, New York, on July 5, 2022**

42. On or about July 5, 2022, a 2021 BMW 740i bearing a New York registration ending in 429 and assigned VIN ending in 9216 (the “2021 BMW 740i”) was reported stolen to the Nassau County Police Department from an address in or around Great Neck, New York, at approximately 10:50 p.m. By 11:55 p.m., the 2021 BMW 740i was detected in Newark, New Jersey.

43. Two days later, on or about July 7, 2022, at approximately 6:46 p.m., LAWRENCE sent FRANKS four photographs of the 2021 BMW 740i, including photographs of its insurance card and license plate. Within two minutes, FRANKS sent the photographs of the 2021 BMW 740i to both CC-2 and CC-4. And by 7:00 p.m., FRANKS had multiple calls with CC-2 and CC-4. FRANKS and CC-4 then exchanged text messages discussing the sale of the 2021 BMW 740i for \$6,000, and CC-4 provided FRANKS with a Bronx address at approximately 7:11 p.m.

44. Between 7:38 p.m. and 8:21 p.m., FRANKS had multiple calls to and from LAWRENCE and CC-4. During this time, location data from Franks’s Cell Phone showed that the phone traveled from New Jersey to the vicinity of the address FRANKS received from CC-4 in the Bronx. At 8:21 p.m., FRANKS texted CC-4, “I’m here.” And at 8:23 p.m., he texted CC-2, “Tell ya boy we here.” Meanwhile, ALPR data revealed that the 2021 BMW 740i made its way to FRANKS’s location in the Bronx from Staten Island between 8:34 p.m. and 8:58 p.m.

45. A few hours later, at 1:32 a.m., on or about July 8, 2022, law enforcement located the 2021 BMW 740i in New Jersey driving in tandem with another stolen car. Law enforcement learned that the two stolen cars were headed to Maryland so they could eventually be shipped to Africa and Jamaica.

### **2021 BMW X7, Stolen from Spring Lake, New Jersey, on July 6, 2022**

46. On or about July 6, 2022, at approximately 10:12 a.m., Franks’s Cell Phone conducted an internet search for “million dollar homes paramus.” Franks’s Cell Phone then visited a real estate listing website for a residence near Midwood Road in Paramus, New Jersey. And between 10:13 a.m. and 11:00 a.m., FRANKS used a maps application on his cell phone to navigate to that residence. Within that time, at approximately 10:48 a.m., a 2021 BMW X7 bearing a New Jersey registration ending in PNX and assigned VIN ending in 8483 (the “2021 BMW X7”) was reported stolen to the Paramus Police Department from an address on or around Paramus Road—less than two miles from the location entered on Franks’s Cell Phone—in Paramus, New Jersey. Based on surveillance footage and ALPR data, law enforcement believes that the Co-conspirators used the 2021 BMW M3 (whose theft is summarized in paragraphs 29 through 36) to steal the 2021 BMW X7.

47. A few minutes later, at approximately 11:15 a.m., FRANKS took four photographs of what law enforcement believes to be the 2021 BMW X7. Notably, the

victim reported that the 2021 BMW X7 contained a car seat and two of the photographs taken with Franks's Cell Phone showed a car seat in the background. Further, metadata from the 2021 BMW X7's tracking system revealed that the car was stopped in the vicinity of North Clinton Street and Dodd Street in Bloomfield, New Jersey. And metadata from FRANKS's photographs revealed that they were taken in the vicinity of John F. Kennedy Boulevard in Bloomfield—just 100 feet from the location identified by the car's tracking system.

48. Within a minute of taking the photographs of the 2021 BMW X7, FRANKS began disseminating them to his Co-conspirators, including CC-1, CC-2, CC-4, and at least six others. CC-4 responded to FRANKS's photographs with "How much," to which FRANKS replied, "2021 8k." The two then spoke on the phone at least twice.

49. Soon after FRANKS's text exchange with CC-4, at approximately 12:50 p.m., the 2021 BMW M3 (which was used to steal the 2021 BMW X7) and the 2021 BMW X7 were detected together traveling from New Jersey to the Bronx.

50. At approximately 1:31 p.m., FRANKS took the photograph included in paragraph 36, which depicts a hand holding a large quantity of cash in a car believed to be the 2021 BMW M3.

51. By 4:49 p.m., FRANKS informed one of his Co-conspirators that the 2021 BMW X7 was "sold." To date, the 2021 BMW X7 remains stolen.

**2022 Mercedes Benz S580, Stolen from Woodbridge, New Jersey,  
on October 10, 2022**

52. On or about October 10, 2022, a 2022 Mercedes Benz S580 bearing a New Jersey registration ending in 795 and assigned VIN ending in 3060 (the "2022 Mercedes Benz S580") was reported stolen to the Woodbridge Police Department from an address in or around Woodbridge, New Jersey, between approximately 6:15 p.m. and 6:19 p.m. Within an hour, the car was detected in Newark.

53. Minutes later, at approximately 6:34 p.m., BELLAMY exchanged messages with Co-conspirator-7 ("CC-7"), during which BELLAMY sent four photographs of the 2022 Mercedes Benz S580 (including photographs showing the license plate and the car's inspection report). The two agreed on a \$7,500 price for the 2022 Mercedes Benz S580, and CC-7 provided BELLAMY with a Bronx address, which BELLAMY immediately forwarded to Co-conspirator-8 ("CC-8").


54. During BELLAMY's and CC-7's exchange, a Kia Optima bearing New Jersey registration ending in NWE and registered to BELLAMY's girlfriend (the "Kia") was detected near Grove Street in Irvington near an apartment associated with BELLAMY and WRIGHT, at approximately 9:19 p.m. After the Kia arrived there, at approximately 9:33 p.m., BELLAMY told CC-7 that he was with "my girl." And an

hour later, the Kia and the 2022 Mercedes Benz S580 made their way from New Jersey to New York—consistent with BELLAMY’s text exchange. The Kia was detected crossing from New Jersey into New York at approximately 10:29 p.m., while the 2022 Mercedes Benz S580 was detected doing the same at approximately 10:44 p.m. The Kia returned to the area of Grove Street in Irvington at approximately 12:33 a.m. (on October 11, 2022).

55. Law enforcement recovered the 2022 Mercedes Benz S580 in the Bronx, later on or about October 11, 2022.

**2019 Porsche Cayenne, Stolen from Staten Island, New York,  
on February 27, 2023**

56. On or about February 26, 2023, a 2018 red Honda Accord bearing a New Jersey registration ending in NWG (the “Red Honda”) was reported stolen to the Edison Police Department from an address in or around Edison, New Jersey.

57. In the early hours of February 27, 2023, at approximately 4:52 a.m., a social media account believed to be used by BRASWELL (“Braswell’s account”) posted a publicly available story showing two individuals—believed to be BRASWELL and WRIGHT—sitting in a moving car.<sup>13</sup> In the story, the two individuals were wearing similar gray and black Nike tops with a V-shape pattern in the front, and the story includes the caption “Me n Gbz .<sup>14</sup>

58. A few hours later, at approximately 7:52 a.m., Braswell’s account posted another story that appears to be taken from a car that is crossing a bridge that connects New Jersey and New York through Staten Island. Security footage also showed that a red Honda Accord crossed a bridge from New Jersey into Staten Island, New York, during this time. Additionally, the security footage from the bridge also captures the front passenger of the red car wearing a black and gray top similar to that worn by the individual in the story posted by Braswell’s account.

59. Approximately one hour later, at 9:18 a.m., a 2019 Porsche Cayenne bearing a New York Registration ending in JOE (the “2019 Porsche Cayenne”) was reported stolen to New York Police Department from an address in Staten Island, New York. Based on video footage, law enforcement determined that the Red Honda (stolen from New Jersey) and an individual wearing a black and gray top were involved in the theft of the 2019 Porsche Cayenne (in New York).

60. Minutes before the theft, the Red Honda began following the 2019 Porsche Cayenne. At approximately 9:17 a.m., the 2019 Porsche Cayenne parked on

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<sup>13</sup> The Instagram “stories” feature allows users to post photos and/or videos that are available to be viewed for 24 hours, unless settings are adjusted to store the content for a longer period of time.

<sup>14</sup> As noted above, Gbz is one of WRIGHT’s aliases.

or around Annadale Road in Staten Island, and the driver exited the car. The Red Honda also stopped, and the front passenger—who was wearing a red and gray top—exited the car and approached the 2019 Porsche Cayenne. The 2019 Porsche Cayenne then drove off. The Red Honda made a K-turn and followed it.

61. Soon after the theft of the 2019 Porsche Cayenne, the Red Honda returned to New Jersey. The 2019 Porsche Cayenne also made its way to New Jersey. The next day, on or about February 27, 2023, the 2019 Porsche Cayenne was involved in an attempted theft of a 2022 Bentley convertible at a car wash in Eatontown, New Jersey. Security footage from the car wash showed that the suspects arrived in a 2019 Porsche Cayenne and wore distinctive black and gray tops with a V-shape pattern in the front.

62. A day later, on or about February 28, 2023, at approximately 12:00 p.m., the 2019 Porsche Cayenne was involved in an attempted theft of a Land Rover Range Rover parked at a dealership in Englewood Cliffs, New Jersey. Security footage from the dealership showed that the suspects again arrived in a 2019 Porsche Cayenne and wore distinctive black and gray tops with a V-shape pattern in the front. Within the hour, at approximately 12:47, law enforcement identified a publicly accessible livestream made on a social account believed to be used by WRIGHT.<sup>15</sup> The livestream shows WRIGHT, BRASWELL, and two others in a car. WRIGHT and BRASWELL (both sitting in the front seats) were wearing grey and black Nike tops with a V-shape pattern nearly identical to those described above. Further, BRASWELL wore a similar top when he was arrested on state charges on or about November 21, 2021.

63. Law enforcement recovered both the 2019 Porsche Cayenne and the Red Honda in Newark, New Jersey, on or about March 3, 2023.

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64. As a result of the conspiracy, the Co-conspirators stole at least 14 cars with an estimated value of over \$550,000.

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<sup>15</sup> The Instagram “livestream” feature permits users to share a live broadcast.