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DEC 05 2024

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

AT 8:30
CLERK, U.S. DISTRICT COURT - DNJ

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Hon. Tonianne J. Bongiovanni,
 : U.S.M.J.
 PAUL X. MCNEIL :
 : Mag. No. 24-mj-3037 (TJB)

I, Justin Notarfrancesco, 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 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.

Justin Notarfrancesco
Justin Notarfrancesco
Special Agent
Federal Bureau of Investigation

Attested to by telephone pursuant to
Fed. R. Crim. P. 4.1(b)(2)(A)
on December 5, 2024,
in the District of New Jersey

Hon. Tonianne J. Bongiovanni
United States Magistrate Judge
Name and Title of Judicial Officer

Tonianne J. Bongiovanni
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Commit Hobbs Act Robbery)

On or about September 30, 2022, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

PAUL X. MCNEIL,

did knowingly and intentionally conspire and agree with another 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, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of Victim-1, an employee of an auto recycling shop located in Ewing, New Jersey.

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

COUNT TWO
(Hobbs Act Robbery)

On or about September 30, 2022, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

PAUL X. MCNEIL,

did knowingly and willfully obstruct, delay and affect commerce, and attempt 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, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of Victim-1.

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

COUNT THREE

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

On or about September 30, 2022, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

PAUL X. MCNEIL,

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, namely, the Hobbs Act Robbery charged in Count Two of this Complaint, did knowingly use and carry a firearm, which was brandished.

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

COUNT FOUR
(Hobbs Act Robbery)

On or about August 10, 2023, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

PAUL X. MCNEIL,

did knowingly and willfully obstruct, delay and affect commerce, and attempt 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, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person or property of Victim-2, the owner of a cannabis shop in Trenton, New Jersey.

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

COUNT FIVE

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

On or about August 10, 2023, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

PAUL X. MCNEIL,

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, namely, the Hobbs Act Robbery charged in Count Four of this Complaint, did knowingly use and carry a firearm, which was discharged.

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

COUNT SIX
(Causing Death Through Use of a Firearm)

On or about August 10, 2023, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

PAUL X. MCNEIL,

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, namely, the Hobbs Act Robbery charged in Count Four of this Complaint, did knowingly and intentionally use and carry a firearm, and in doing so, knowingly and purposely caused the death of Victim-2.

In violation of Title 18, United States Code, Section 924(j)(1).

COUNT SEVEN
(Hobbs Act Robbery)

On or about September 23, 2023, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

PAUL X. MCNEIL,

did knowingly and willfully obstruct, delay and affect commerce, and attempt 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, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of Victim-3, Victim-4, and Victim-5, all of whom were located in a residence in Ewing, New Jersey.

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

COUNT EIGHT

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

On or about September 23, 2023, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

PAUL X. MCNEIL,

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, namely, the Hobbs Act Robbery charged in Count Seven of this Complaint, did knowingly use and carry a firearm, which was brandished.

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

ATTACHMENT B

I, Justin Notarfrancesco, 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, 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.

The Robberies

1. Law enforcement, including the FBI, has been investigating armed robberies targeting certain businesses in Mercer County, New Jersey, committed by an individual, later identified as Paul X. McNeil ("MCNEIL"). As further detailed herein, MCNEIL targeted certain businesses and/or business owners based upon these individuals' access to the businesses' cash proceeds.

The September 30, 2022 Hobbs Act Robbery (Counts One through Three)

2. On or about September 30, 2022, at approximately 6:45 a.m., MCNEIL and another male ("Coconspirator-1"), each of whom wore facemasks and wore or carried reflective construction vests, entered an auto recycling shop in Ewing, New Jersey (the "auto recycling shop"). Upon entering the auto recycling shop, MCNEIL and Coconspirator-1 encountered an employee ("Victim-1"), who was in the process of removing the cash proceeds from the auto recycling shop's safe for transportation by another employee to the auto recycling shop's other facility located in Pennsylvania. MCNEIL pointed a handgun at Victim-1 before MCNEIL and Coconspirator-1 took from Victim-1 approximately \$150,000 in cash proceeds from the business and Victim-1's lawfully registered firearm. MCNEIL and Individual-1 then fled the area in a stolen vehicle.

3. Several hours after the auto recycling shop robbery, MCNEIL purchased a vehicle from a car dealership in Ramsey, New Jersey, providing the dealership as downpayment for the vehicle \$9,500 in cash, comprised of ninety-five \$100 bills.

4. A court-ordered search warrant of one of MCNEIL's cellular phones ("Cellphone-1") revealed a photograph saved on Cellphone-1 depicting both a handgun and reflective construction vest, similar to the vests worn or carried by MCNEIL and Coconspirator-1 during the robbery. Additionally, upon executing the warrant on Cellphone-1, law enforcement discovered text messages exchanged between MCNEIL and another individual believed to be Coconspirator-1 planning for the robbery of the auto recycling shop, as follows:

- a. On September 29, 2022, at approximately 11:44 p.m., MCNEIL texted Conconspirator-1, "Be up at 4 we gonna figure," and Coconspirator-1 responded, "K hit me."
- b. On September 30, 2022, at approximately 4:10 a.m., Conconspirator-1 texted MCNEIL, "Wassup?" MCNEIL responded at approximately 20 seconds later, "I'm getting ready."
- c. On September 30, 2022, at approximately 4:43 a.m., MCNEIL texted Coconspirator-1, "Come out do [so] we can be dere on time."

5. Pursuant to a court-ordered warrant, law enforcement obtained historical cell-site data for Cellphone-1's location on September 30, 2022, which indicate that Cellphone-1 was in the vicinity of MCNEIL's residence in Trenton, New Jersey at approximately 4:09 a.m. Between approximately 4:30 a.m. and 6:00 a.m., the cell-site data indicate that Cellphone-1 moved in the direction of the auto recycling shop. The cell-site records further reflect that, at approximately 6:44 a.m., moments before the robbery, Cellphone-1 placed an outgoing call which utilized a cellular tower in the vicinity of the auto recycling shop. Approximately fourteen minutes later, at or around 6:58 a.m., the cell-site records placed Cellphone-1 back in Trenton, in the vicinity of Cadwalader Park.

The August 10, 2023 Hobbs Act Robbery and Murder (Counts Four through Six)

6. On or about August 10, 2023, the owner ("Victim-2") of a cannabis shop in Trenton, New Jersey (the "cannabis shop") took cash proceeds from the cannabis shop out of the register in the course of closing the business for the evening, and left the cannabis shop at approximately 11:33 p.m. Victim-2 then drove to Victim-2's residence in Lawrence Township, New Jersey (the "Lawrence Township residence").

7. Shortly after arriving at the Lawrence Township residence and exiting Victim-2's vehicle, Victim-2 entered the residence at approximately 12:27 a.m. At that point, MCNEIL confronted Victim-2 inside the Lawrence Township residence. Victim-2's spouse and minor children were in the residence asleep. As overheard by an awoken Victim-2's spouse, Victim-2 said to MCNEIL, in substance and in part, "No, no, no... please, here, you can have it...[,] before MCNEIL fired a single gunshot at Victim-2's right upper back. MCNEIL then took from Victim-2's pockets the cannabis shop's cash proceeds and Victim-2's jewelry, which Victim-2 was wearing at the time of the murder. MCNEIL then fled the Lawrence Township residence.

8. Victim-2 died as a result of the gunshot wound sustained during the robbery.

9. During a subsequent search of Victim-2's vehicle, law enforcement discovered an Apple AirTag¹ secreted inside the vehicle. Upon further investigation, law enforcement learned that the Apple AirTag was registered to MCNEIL, had been activated on August 6, 2023, only days before Victim-2's murder, and deactivated on August 11, 2023, at approximately 9:27 a.m., approximately nine hours after the murder.

10. A court-ordered search warrant of one of MCNEIL's cellular phones ("Cellphone-2") revealed photographs saved on Cellphone-2 of surveillance MCNEIL had taken of Victim-2 before the murder and photographs of MCNEIL wearing jewelry that MCNEIL had taken from Victim-2 after the murder.

11. Additionally, pursuant to a court-ordered warrant, law enforcement obtained historical cell-site data for Cellphone-2's location on August 10, 2023, which indicate that Cellphone-2 was in the vicinity of the cannabis shop from approximately 10:15 p.m. to at least 11:33 p.m. Those records further reflect that, at approximately 11:53 p.m., Cellphone-2 interacted with cell towers placing Cellphone-2 in the vicinity of the Lawrence Township residence. Finally, those records indicate that Cellphone-2 had returned to Trenton by approximately 12:45 a.m., several minutes after the robbery and murder of Victim-2.

12. During the course of the investigation, on or about September 16, 2023, law enforcement lawfully seized and impounded MCNEIL's vehicle. On or about September 21, 2023, MCNEIL called the Mercer County Prosecutor's Office's Forfeiture Unit to ask if he could recover his work identification card and certain items of jewelry he claimed were in his vehicle. MCNEIL stated that the jewelry was located in the vehicle inside a white sock. MCNEIL provided law enforcement oral consent to enter the vehicle to look for this property. Upon observing jewelry in a white sock in the vehicle's center console, law enforcement obtained a search warrant to search MCNEIL's vehicle. Pursuant to that warrant, law enforcement seized and searched the white sock, as described by MCNEIL, which contained jewelry Victim-2 was wearing on the night of Victim-2's murder.

The September 23, 2023 Hobbs Act Robbery (Counts Seven and Eight)

13. On September 23, 2023, shortly after 8:00 a.m., MCNEIL entered the residence of Individual-1 in Ewing, New Jersey (the "Ewing residence"), carrying a handgun and wearing a black ski mask. Individual-1 owned and

¹ An Apple AirTag is a small tracking device which provides its location by emitting a Bluetooth signal detectible by anyone who has registered the device.

operated a business remodeling and renovating residential properties for resale out of the Ewing residence. Upon entering the Ewing residence, MCNEIL encountered three individuals: Victim-3, who worked with Individual-1 flipping houses, Victim-4, and Victim-5 (collectively, the "victims"). Victim-3 and Victim-4 were minors living in the Ewing residence. Individual-1 was not home at the time. MCNEIL pointed a handgun at the victims before restraining them by zip tying their hands behind their backs. MCNEIL then asked the bound victims for Individual-1's location while also demanding, "where's the money," indicating that MCNEIL was looking for a specific source or amount of money. Moments later, MCNEIL forced the victims at gunpoint into the basement of the Ewing residence. While the victims remained bound in the basement, MCNEIL searched the Ewing residence for the money he had earlier demanded. During this search, MCNEIL discovered in the Ewing residence and took approximately \$4,500 in cash, which Individual-1 had recently received from a real estate transaction, a large amount of \$2 bills Individual-1 had collected, personal items owned by Individual-1 and the victims, including luxury belts, jewelry, an alligator backpack, Victim-3's iPhone, and a Sony Play Station 5 gaming console. At some point, Victim-3 freed Victim-3's hands from the zip ties and escaped the Ewing residence through a basement window before running to a nearby fire station seeking assistance. Shortly thereafter, law enforcement arrived at the Ewing residence and discovered that MCNEIL had fled the area.

14. Law enforcement lawfully obtained records from a ride sharing company which indicated that MCNEIL was picked up by a ride share on September 23, 2023, at approximately 8:27 a.m., just one block from the Ewing residence, before being dropped off at approximately 8:47 a.m. at his (MCNEIL's) residence in Trenton. MCNEIL was carrying a garbage bag, and informed the driver of the ride share that he (MCNEIL) had a PS5 and clothing in the bag.

15. Utilizing the Find My iPhone application, law enforcement learned that the iPhone MCNEIL took from the Ewing residence reported its location through the application on September 23, 2023, at approximately 8:48 a.m., at MCNEIL's residence in Trenton, New Jersey.

16. Additionally, pursuant to the court-ordered warrant for Cellphone-2's historical cell-site data, discussed in paragraph 11, *infra*, law enforcement learned that Cellphone-2 was in the vicinity of the Ewing residence during the period between approximately 7:40 a.m. and 8:33 a.m. on September 23, 2023. Additionally, those records reflect that, by approximately 8:53 a.m. on that date, Cellphone-2 was in the vicinity of MCNEIL's residence.

17. Additionally, during the course of the investigation, on or about October 3, 2023, law enforcement searched MCNEIL's residence pursuant to a court-ordered warrant and found items that had been taken on or about September 23, 2023, by force, violence, and fear of injury from the victims in the Ewing residence, including five luxury belts, an alligator backpack, and a Sony

Play Station 5. Law enforcement also found in MCNEIL's residence pursuant to the search approximately \$4,000 in cash packaged in rubber bands, eighteen \$2 bills, and packaging for Apple AirTags like the AirTag recovered from Victim-2's vehicle.

18. In or around August 2024, MCNEIL, while detained at a jail, delivered by hand to Individual-1 two handwritten letters threatening Individual-1, and demanding that Individual-1 impede and obstruct the criminal investigation of MCNEIL for the robbery committed on or about September 23, 2023, at the Ewing residence, as discussed in paragraphs 13-17, *infra*, by providing false information to law enforcement. Below are some of the threats MCNEIL made to Individual-1 in these two letters:

- a. "I know you don't know me. I'm writing this hoping you find it in your heart. To do the right thing."
- b. "If you get me out of this I will make it right. I need a affidavit. You know how to make it happen. I know some of your kids. Not f***ing with you right now. Your son [Victim-3] not coming to court, he coming like you made him say that. Between us, its you that I need to free me, not your son [Victim-3]."
- c. "I wrote some of my discovery so you can see that it is you. I can go to the street in really expose you for going in on me and others. But I'm not trying to do that."
- d. "I just want to see if you are going to do what is right."
- e. "You did this whole investigation. I just be letting you save face by saying it is your son [Victim-3]. But between us its really you Dead Ass!"
- f. "I send you the original copy of the discovery. I put it in the juice. But Im guessing you didn't get it that why I'm writing it down this time. If you serious about ending this s**t all you got to do is contact both [the Assistant Prosecutor at the Mercer County Prosecutor's Office and the Detective at the Ewing Police Department] you already got his number and tell them that you want to drop all charges against McNeil because yall arrested the wrong person. The item yall found in his residence such as the PS5, black backpack, \$2 dollars bills and belts is not mines."

19. Each of the robberies on or about September 30, 2022, August 10, 2023, and September 23, 2023, as discussed above, targeted and successfully obtained, among other property, proceeds of various businesses that engaged in

interstate commerce. Accordingly, each of these robberies obstructed, delayed, and affected commerce, and the movement of any article and commodity in commerce.