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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA :

v. :

MARCO HONESTY,  
RICHARD FRANCIS,  
DOMINIQUE HAYES,  
a/k/a "Domo,"  
DEANDRE DUDLEY,  
a/k/a "Dreday,"  
ILON COLES-MELSON  
a/k/a "Texas," and  
MARCUS GALLMON

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Hon. Leda Dunn Wettre

Mag. No. 25-13032

**CRIMINAL COMPLAINT**

I, Andrew Gottilla, 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 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.

*/s/ Andrew Gottilla*

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Andrew Gottilla, Special Agent  
Homeland Security Investigations

Special Agent Gottilla attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A) on January 28, 2025 in the District of New Jersey

*/s/ Leda Dunn Wettre*

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HONORABLE LEDA DUNN WETTRE  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

(Conspiracy to Sell and Receive Stolen Property)

Between on or about March 7, 2024, and on or about November 21, 2024, in the District of New Jersey, and elsewhere, defendants

**MARCO HONESTY,  
RICHARD FRANCIS,  
DOMINIQUE HAYES,  
a/k/a “Domo,”  
DEANDRE DUDLEY,  
a/k/a “Dreday,”  
ILON COLES-MELSON,  
a/k/a “Texas,” and  
MARCUS GALLMON,**

knowingly and intentionally conspired with each other and others to receive, possess, conceal, store, barter, sell, and dispose of any goods, wares, merchandise, securities, and money, of the value of \$5,000 or more, which had crossed a State or United States boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, contrary to Title 18, United States Code, Section 2315.

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

## **ATTACHMENT B**

I, Andrew Gottilla, am a Special Agent with Homeland Security Investigations. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with witnesses and 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.

### **Background of the Investigation**

1. Since in or around March 2024, law enforcement has been investigating a string of commercial burglaries that have occurred between in or around March 2024 and November 2024 in multiple states, including New Jersey, Pennsylvania, New York, and Maryland. The burglaries share a similar modus operandi. Specifically, the burglars, in groups of approximately three or four per burglary, target high-end consignment shops and force entry into the shops with sledgehammers or other heavy objects in the early hours of the morning. The burglars target designer handbags and other high-end goods, sometimes using bolt cutters to cut the rope or string tying the handbags together (a method used as a security measure) in the shops. The burglars then flee the scene in vehicles, often stolen or rented, and transport the stolen property from the burglaries across state lines to Delaware, Maryland, Washington, D.C., and Virginia, until the burglars sell the handbags or move them to a new location.

2. The investigation revealed that Ilon Coles-Melson ("MELSON"), Deandre Dudley ("DUDLEY"), Richard Francis ("FRANCIS"), Marco Honesty ("HONESY"), Dominique Hayes ("HAYES"), and Marcus Gallmon ("GALLMON"), together with others (collectively, the "Perpetrators"), were engaged in a conspiracy to commit these burglaries and transport the stolen goods across state lines. The Perpetrators, who are all are residents of the greater Washington, D.C. and Maryland area, have been identified through various means, including arrests contemporaneous with or shortly after some of the burglaries, connections to stolen or rented cars used in the burglaries, possession of stolen goods from the burglaries, location information, electronic and telephonic communications, and photographs of the stolen goods stored on the Perpetrators' phones. The investigation revealed that the Perpetrators communicated with each other and with others about the burglaries and stolen goods before, during, and after several of the burglaries.

### **The March 7, 2024 Burglary in Cherry Hill, New Jersey**

3. On or about March 7, 2024, at approximately 12:48 A.M., law enforcement responded to a burglary in progress (the “Cherry Hill Burglary”) at a consignment shop in Cherry Hill, New Jersey (the “Cherry Hill Shop”). Security-camera footage shows a man wearing a black ski mask, black pants, black sweatpants, and black gloves smashing the front window of the shop. The footage also shows three men stealing multiple handbags, jewelry, and clothing from the shop and subsequently fleeing in a dark-colored Chevrolet sedan.

4. Location information for a cell phone number that HAYES used throughout the conspiracy period (the “HAYES -3466 number”) revealed that the HAYES -3466 number was located in or around Cherry Hill around the time of the Cherry Hill Burglary, and subsequently traveled southbound to Washington, D.C. Specifically, call detail records show that the HAYES -3466 number received a phone call at approximately 1:01 A.M. on March 7, 2024 when the HAYES -3466 number was approximately nine miles from the Cherry Hill Shop. The location information further revealed that the -HAYES 3466 number received a phone call at approximately 3:05 A.M. in or around Washington, D.C.

5. Location information for a cell phone number that HONESTY used from at least on or about March 7, 2024 through April 11, 2024 (the “HONESTY -5124 number”) shows that the HONESTY -5124 number was located in or around Cherry Hill around the time the Cherry Hill Burglary, and subsequently traveled southbound into Delaware. Specifically, cell site location information show that the HONESTY -5124 number was located in close proximity of the Cherry Hill Shop at 12:48 A.M., and was located on the Delaware Memorial Bridge heading southbound at approximately 1:30 A.M. on March 7, 2024.

### **The March 19, 2024 Burglary in Colts Neck, New Jersey**

6. On or about March 19, 2024, law enforcement responded to a burglary in progress (the “Colts Neck Burglary”) at a consignment shop located in Colts Neck, New Jersey (the “Colts Neck Shop”). Security-camera footage shows three individuals breaking into the shop and stealing dozens of handbags at approximately 1:19 A.M.

7. Security-camera footage from the Colts Neck Burglary also shows the Perpetrators using a dark-colored Subaru Forester with the license plate obstructed, later determined to bear Florida registration number ending in ----AZ, (the “Forester”). On March 19, 2024, at or around 2:41 A.M., the Forester was observed on automatic license plate registration system (“ALPR”) footage crossing the Delaware Memorial Bridge southbound into Delaware from New Jersey. Rental car records related to the Forester show that the Forester was rented on March 17, 2024, in Washington, D.C. by Individual-1, an individual

associated with HONESTY, and that an individual that law enforcement believes to be HONESTY was captured on security-camera footage with Individual-1 at the rental car company on March 17, 2024.

8. Location information for the HONESTY -5124 number revealed that the number was located in or around Colts Neck, New Jersey at the time of the Colts Neck Burglary. Specifically, location information shows that the HONESTY -5124 number was located in close proximity to the Colts Neck Shop between approximately 12:45 A.M. and 1:28 A.M. on March 19, 2024.

9. As discussed in more detail below, FRANCIS was arrested on April 14, 2024, in Washington, D.C. in a vehicle that was later lawfully searched. Law enforcement recovered from the vehicle several designer handbags, including a black Bottega Veneta Leather handbag and a blue Fendi pocketbook, both of which were stolen during the Colts Neck Burglary.

10. During the investigation, law enforcement obtained phone records that indicate that a cell phone number MELSON used in March 2024, ending in -3893, and a cell phone number that DUDLEY used throughout the conspiracy period (the "DUDLEY -4877 number") communicated with each other through phone calls at approximately 9:55 A.M. and 1:00 P.M. on March 19, 2024. The phone records also indicate that the HAYES -3466 number communicated with the HONESTY -5124 number through a phone call at approximately 6:38 P.M. on March 19, 2024.

### **The March 20, 2024 Burglary in Roxbury, New Jersey**

11. On or about March 20, 2024, at approximately 3:24 A.M., law enforcement responded to a burglary in progress ("the Roxbury Burglary") at a consignment shop located in Roxbury, New Jersey (the "Roxbury Shop"). Surveillance footage from the Roxbury Shop shows four individuals participating in the burglary. Two individuals, wearing all black clothing and ski masks, forced entry into the Roxbury Shop by breaking the plate glass window, and then stole merchandise from inside the store that they handed to the other two individuals outside of the store.

12. The investigation revealed that the Perpetrators used the Forester to facilitate commission of the Roxbury Burglary. Specifically, ALPR footage shows that the Forester was located in close proximity to the Roxbury Shop approximately 15 minutes prior to the Roxbury Burglary and was captured on ALPR footage going southbound on the Delaware Memorial Bridge into Delaware at approximately 5:12 A.M.

13. Location information for the HONESTY -5124 number revealed that the number was located in or around Roxbury, New Jersey at the time of the

Roxbury Burglary. Specifically, location information indicates that the HONESTY -5124 number was located in close proximity to the Roxbury Shop at 3:13 A.M. on March 20, 2024.

14. During the investigation, law enforcement obtained phone records that indicate that the HAYES -3466 number communicated with the HONESTY -5124 phone number at approximately 8:44 P.M. on March 20, 2024, through a phone call.

**The March 26, 2024 Burglaries in Englewood, Tenaflly, and Roxbury, New Jersey**

15. On or about March 26, 2024, three burglaries took place between the hours of approximately 1:40 A.M. and 2:40 A.M. at consignment shops in Englewood, New Jersey, Tenaflly, New Jersey, and at the Roxbury Shop (the “March 26 Burglaries”). Security-camera footage at all three of the consignment shops showed the Perpetrators exiting and reentering a Dodge Ram TRX bearing Virginia Temporary Registration number ending in ----1F. The March 26 Burglaries resulted in the theft of dozens of designer handbags and other luxury items.

16. Location information revealed that the cell phone FRANCIS used from at least on or about March 26, 2024, until on or about April 14, 2024<sup>1</sup> (“the FRANCIS -5166 number”) was in close proximity to the HONESTY -5124 number in New Jersey at approximately 1:07 A.M. and 3:23 A.M. on March 26, 2024. As noted above, the March 26 Burglaries took place in New Jersey between the hours of 1:40 and 2:40 A.M. Location information also shows that the HONESTY -5124 number was located in the vicinity of all three of the March 26 Burglaries. Specifically, the HONESTY -5124 number was located in Englewood, New Jersey in close proximity to the consignment shop that was burglarized at 1:30 A.M., in Tenaflly, New Jersey in close proximity to the consignment shop that was burglarized at 1:51 A.M., and in close proximity to the Roxbury Shop at 2:42 A.M. on March 26, 2024. Location information also shows that the HONESTY -5124 number crossed state lines and was located in Pennsylvania at approximately 3:34 A.M.

17. Lawfully obtained information revealed that FRANCIS and GALLMON communicated via direct messages on Social Media Platform-1, utilizing usernames known to be associated with FRANCIS and GALLMON, a few hours after the March 26 Burglaries. Specifically, FRANCIS sent a message to GALLMON on March 26, 2024, at 7:53 A.M., stating “[s]up slime.” GALLMON responded approximately 30 seconds later, “[c]an I get a bag from one of da men

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<sup>1</sup> As discussed below, FRANCIS was arrested in Washington, D.C. on April 14, 2024, and his phone, which utilized the FRANCIS -5166 number, was seized incident to arrest.

trying get a phone today.” FRANCIS responded, “[s]hidd we can make something shake. Lemme see how shit go.” GALLMON then responded, “[d]ats a bet glook bro domo said ask someone else cuz he goin give Texas one.” As noted above, the investigation revealed that “Domo” is a known alias for HAYES and “Texas” is known alias for MELSON.

18. During the investigation, law enforcement obtained phone records that indicate that the HAYES -3466 number and the cell phone that DUDLEY used at the time of the March 26 Burglaries (the “DUDLEY -5124 number”) communicated with each other through a phone call at approximately 9:17 A.M. on March 26, 2024.

### **The April 11, 2024 Burglary in Watchung, New Jersey**

19. On or about April 11, 2024, at approximately 2:01 A.M., law enforcement responded to a burglary in progress (the “Watchung Burglary”) at a consignment shop located in Watchung, New Jersey (“the Watchung Shop”). Security-camera footage from the Watchung Shop shows that three individuals gained entry by forcing open the front door with a window punch. The footage then shows the three Perpetrators taking dozens of handbags from inside of the store before exiting.

20. A dark-colored Acura MDX, an SUV, was captured on security-camera footage from the Watchung Shop. A 2017 Acura MDX bearing Maryland Temporary registration ending in -----00 (the “Acura”) was observed on an ALPR reader approximately three minutes prior to the burglary approximately 0.25 miles away from the Watchung Shop.

21. A law enforcement officer saw a dark SUV with a Maryland temporary plate traveling in the direction of the Watchung Shop minutes prior to the burglary. CCTV footage from the Delaware Memorial Bridge shows a black SUV with a white paper temporary plate affixed to the rear of the vehicle consistent with the Acura crossing the Delaware Memorial Bridge southbound to Delaware at approximately 03:25 A.M.

22. On or about April 14, 2024, law enforcement officers in Washington, D.C. saw the Acura, determined that it had been stolen, stopped the Acura and arrested the sole occupant, FRANCIS. The officers looked inside the Acura and saw bolt cutters and a high-end designer handbag.

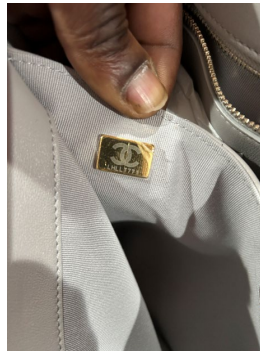
23. Pursuant to a lawful search of the Acura, law enforcement recovered several designer handbags, including, as discussed above, items that were stolen in the Colts Neck Burglary, and a Gucci belt, which was stolen during the Watchung Burglary.



24. Location information for the HAYES -3466 number, the FRANCIS -5166 number, and the HONESTY -5124 number revealed that these numbers were located in or around Watchung around the time of the Watchung Burglary. Specifically, the information shows that the HONESTY -5124 number was in close proximity to the Watchung Shop at 1:59 A.M., and that the FRANCIS -5166 number was located in Watchung at 2:10 A.M. and on the Delaware Memorial Bridge at approximately the same time that the Acura crossed southbound into Delaware. Call detail records for the HAYES -3466 number show that the HAYES -3466 number made a call approximately 19 miles away from the Watchung Shop at 1:23 A.M., and received a call at approximately 2:18 A.M., approximately three miles away from the Watchung Shop.

25. During the investigation, law enforcement saw photographs of handbags that were stolen in the Watchung Burglary that FRANCIS had in a cloud-based account, including:

a. Photographs taken on April 12, 2024 of a White Chanel handbag, which was stolen from the Watchung Shop. Location information for the FRANCIS -5166 number show that Francis was in Hanover, Maryland on April 12, 2024, when this photo was taken.



b. Photographs taken on April 12, 2024, of a black Chanel handbag, which was stolen from the Watchung Shop. Location information for the FRANCIS -5166 number show that FRANCIS was in Hanover, Maryland on April 12, 2024, when this photo was taken.





**The May 5, 2024 Burglary in Cape May, New Jersey**

26. On or about May 5, 2024, at approximately 02:55 A.M., law enforcement responded to a burglary in progress (the “Cape May Burglary”) at a consignment shop located in Cape May, New Jersey (the “Cape May Shop”). Security camera-footage showed that the Perpetrators drove a light-colored SUV with a license plate number that did not match the make and model of the car associated with that license plate number in law enforcement databases, indicating that the vehicle was utilizing a fictitious license plate.

27. The investigation revealed that after his April 14, 2024, arrest, FRANCIS used a new phone number (the “FRANCIS -7004 number”). Location information for the FRANCIS -7004 number revealed that the number was present near the location of the Cape May Shop at the time of the Cape May Burglary. Specifically, the FRANCIS -7004 number was located in close proximity to the Cape May Shop at 2:47 A.M. on May 5, 2024.

28. During the investigation, law enforcement obtained phone records that indicate that the HAYES -3466 number and the FRANCIS -7004 number communicated with each other through a phone call at approximately 10:44 A.M. on May 5, 2024. Phone records also indicate that the DUDLEY -4877 number and the HAYES -3466 number communicated with each other through a phone call at approximately 9:53 PM on May 5, 2024.

**The May 16, 2024 Burglary in Haddonfield, New Jersey**

29. On or about May 16, 2024, at approximately 1:30 A.M., law enforcement responded to a burglary in progress (the “Haddonfield Burglary”) at a consignment shop in Haddonfield, New Jersey (the “Haddonfield Shop”). Three Perpetrators used a sledgehammer to force entry into the Haddonfield Shop, and video footage from the burglary shows the Perpetrators removing items from the store and leaving the area in a silver Toyota SUV with a paper license plate. Dozens of designer handbags and other luxury items were stolen.

30. Location information for a phone number that MELSON utilized (the “MELSON -4202 number”) revealed that the number was present near the location of the Haddonfield Shop at the time of the Haddonfield Burglary. Specifically, the MELSON -4202 number was located in close proximity to the Haddonfield Shop at approximately 1:24 A.M. and in Delaware in close proximity to the Delaware Memorial Bridge at 2:02 A.M.

31. During the investigation, law enforcement obtained phone records that indicate that the MELSON -4202 number and the DUDLEY -4877 number communicated with each other through a phone call at approximately 10:11 AM on May 16, 2024.

**The June 5, 2024 Burglaries in Livingston and Millburn, New Jersey**

32. On or about June 5, 2024, two burglaries took place at consignment shops in Livingston, New Jersey (the “Livingston Shop”) and Millburn, New Jersey (the “Millburn Shop”) at 4:30 A.M. and 4:53 A.M., respectively (the “June 5 Burglaries”). Security-camera footage at the Livingston Shop shows that four Perpetrators exited a dark colored Chevrolet Camaro and forced entry into the shop by using a sledgehammer to smash the front door. The Perpetrators then stole numerous handbags and other goods from inside the shop and placed them into the Chevrolet Camaro.

33. Security-camera footage at the Millburn consignment shop similarly showed four Perpetrators wearing ski masks and hooded sweatshirts driving a grey Chevrolet Camaro bearing Washington, D.C. registration ending in ----73 (the “Camaro”). Handbags can be seen inside the trunk of the Camaro before the Perpetrators burglarized the Millburn Shop, indicating that the Perpetrators had come from the previous Livingston burglary. Security-camera footage shows the Perpetrators forced entry into the Millburn consignment shop by using a sledgehammer to smash the glass on the front door and then proceed to smash glass display cases to steal numerous handbags and other luxury items, which were placed into the trunk and the passenger compartment of the Camaro.

34. Text messages sent from a phone number that GALLMON used in June 2024 (the “GALLMON -1184 number”) revealed that GALLMON participated in the June 5 Burglaries. Specifically, on June 4, 2024 and June 5, 2024, GALLMON engaged in the following text message communications with Individual-1:

a. On June 4, 2024 at approximately 7:48 P.M., GALLMON sent a message to Individual-1, stating “We goin out tonight so ima let you know wen I come.”

b. Later in the same conversation, GALLMON sent a message to Individual-1 stating, “Ok waiting on dreday we leaving like 10:30/11 but I gotta come switch my clothes.” “Dreday” is a known alias for DUDLEY.

c. On June 5, 2024, at approximately 9:30 A.M., GALLMON sent a message to Individual-1 stating, “I’m goin in the house now to take pics of my bags. Plus we went out New Jersey.” GALLMON then sent Individual-1 a photograph of designer handbags.

d. Later in the same conversation, GALLMON stated, “I apologize it wasn’t on purpose we did 2 plus yk New Jersey higher.” GALLMON then sent photographs of over a dozen handbags and stated, “U like anything?”

e. At approximately 12:27 P.M. on June 5, 2024, GALLMON stated, “& yk wat I was doin New Jersey 4 hour gotta think dere & bck . . . I was squished in the bag w all the bags me & smily.”

35. Law enforcement also obtained text messages between the GALLMON -1184 number and the MELSON -4202 number on June 4, 2024 and June 5, 2024, which revealed that GALLMON and MELSON committed the June 5 Burglaries together:

a. On June 4, 2024, at approximately 8:27 P.M., GALLMON sent a message to MELSON, stating “[w]e still goin tonight?” MELSON responded, “Uk my answer.”

b. On June 5, 2024, at approximately 10:59 A.M., or approximately six hours after the burglary at the Millburn Shop, GALLMON sent a message to MELSON that included a known alias for an individual the investigation has revealed on several occasions purchased stolen handbags from the Perpetrators (“Individual-2”). Specifically, GALLMON stated, “[known alias for Individual-2] or reddz cuz?” GALLMON also sent messages to MELSON stating, “[s]hit just put my shit in bags” and “[t]ook all the sensors off.”

c. Later in the conversation, MELSON sent messages to GALLMON stating, “[b]out come Get u” and “Outside.”

36. Location information for the MELSON -4202 number revealed that the number was present in close proximity to the Millburn Shop at 4:57 A.M. Location information for the DUDLEY -4877 number revealed that the number was located approximately three miles away from the Livingston Shop at 4:39 A.M. and in Delaware at 6:34 A.M.

37. During the investigation, law enforcement obtained phone records that indicate that the HAYES -3466 number and the DUDLEY -4877 number communicated with each other through a phone call at approximately 9:01 A.M. on June 5, 2024. Phone records also indicate that the DUDLEY -4877 number and the GALLMON -1184 number communicated with each other through phone calls at approximately 4:00 P.M. and 4:33 P.M. on June 5, 2024, and that the DUDLEY -4877 number and the FRANCIS -7004 number communicated with each other through a phone call at approximately 6:34 P.M. on June 5, 2024.

### **The June 18, 2024 Burglary in Roxbury, New Jersey**

38. On June 18, 2024, law enforcement responded to a burglary in progress at the Roxbury Shop that was previously burglarized on March 20, 2024 and on March 26, 2024, as described above (the “Roxbury Burglary”). Four Perpetrators burglarized the Roxbury Shop at approximately 4:15 A.M. Law

enforcement saw three Perpetrators flee the Roxbury Shop and enter a gray Toyota Sedan with a white temporary paper registration affixed to the rear, and one Perpetrator flee on foot. All four Perpetrators, including GALLMON and MELSON, were eventually apprehended and arrested after a high-speed chase and car crash.

### **The July 9, 2024 Burglary in Margate, New Jersey**

39. On July 9, 2024, at approximately 2:40 AM., law enforcement responded to a burglary in progress at a consignment shop (the “Margate Shop”) in Margate, New Jersey (the “Margate Burglary”). Three individuals forced entry into the Margate Shop, stole several items, and fled in a dark-colored SUV.

40. Location information revealed that the DUDLEY -4877 number was located in or around Margate, New Jersey at the time of the Margate Burglary and that the number subsequently traveled out of New Jersey into Delaware. Specifically, the information shows that the DUDLEY -4877 number was located in close proximity to the Margate Shop at approximately 2:28 A.M. and in Delaware in close proximity to the Delaware Memorial Bridge at 3:55 A.M.

41. As part of the investigation, law enforcement lawfully obtained messages from Social Media Platform-1 between some of the Perpetrators and Individual-2. The investigation has revealed that Individual-2 resides in and sells handbags out of a location in Alexandria, Virginia. These messages revealed that GALLMON sold designer handbags to Individual-2 that were stolen during the course of the conspiracy.

42. Specifically, on or about July 9, 2024, GALLMON sent a message to Individual-2, stating “[Individual-2], I got 3 bags.” Individual-2 responded, stating, “Ok. When do you want to come,” and GALLMON responded “right now.” Individual-2 asked for the brands of the bags, to which GALLMON responded “Lv Burberry.” Individual-2 asked GALLMON to meet that day. GALLMON also sent Individual-2 a message stating, “[t]his Dre & Domo people.” Domo is a known alias for HAYES.

43. Later in the same conversation on July 9, 2024, GALLMON sent Individual-2 a photograph of a handbag, which had been stolen from the Margate Shop on July 9, 2024.

44. During the investigation, law enforcement obtained phone records that indicate that the HAYES -3466 number and the DUDLEY -4877 number communicated with each other through a phone call at approximately 6:10 A.M. on July 19, 2024.

**The July 19, 2024 Burglary in Armonk, New York**

45. On July 19, 2024, at approximately 1:26 A.M., several Perpetrators burglarized a consignment shop (the “Armonk Burglary”) in Armonk, New York (the “Armonk Shop”). The Perpetrators forced open the back door of the Armonk Shop and took several items, including designer handbags, from inside the shop before fleeing.

46. Surveillance footage from the Armonk Shop shows that the Perpetrators fled in a black sedan with the rear license plate obstructed. The investigation revealed that a vehicle consistent with that description, a Toyota Camry bearing Virginia license plate number ending in -----74 (the “Camry”), was captured on ALPR readers on July 19, 2024 driving northbound approximately five miles away from the Armonk Shop at 1:11 A.M. and southbound approximately five miles away from the Armonk Shop at 1:37 A.M. Rental car records show that HAYES rented the Camry from July 18, 2024 to July 22, 2024.

47. Later on July 19, 2024, GALLMON sent an message to Individual-2 on Social Media Platform-1, stating “[a]re y’all here today” and sent 25 photographs of designer handbags, wallets, and keychains, including a Chanel purse and Louis Vuitton wallet. Individual-2 responded, “[d]o you want to meet this evening or tomorrow morning,” and GALLMON and Individual-2 then arranged a time and place to meet. GALLMON also messaged Individual-2, “when you pay you can just send it to my cash app.” The investigation revealed that 18 of the items depicted in the photographs GALLMON sent to Individual-2 were stolen from the Armonk Shop on July 19, 2024.

48. Also on July 19, 2024, MELSON contacted Individual-2 via Social Media Platform-1 to inquire about selling handbags. MELSON sent photographs of six handbags and stated that he had “about 15 bags” to sell “today if your (sic) available.” Individual-2 asked MELSON to “pls send your requested pricing for each item. Staff will review the pics and reply shortly.” Individual-2 also messaged MELSON, “[w]e can meet early tomorrow morning if your pricing is fair” and provided MELSON with an address in Alexandria, Virginia where they would meet for the sale of the bags. The investigation revealed that the bags in the photographs that MELSON sent to Individual-2 were stolen from the Armonk Shop.

49. Location information for the HAYES -3466 number revealed that the number was present near the location of the Armonk Shop at the time of the Armonk Burglary. Specifically, the HAYES -3466 number was located in close proximity to the Armonk Shop at approximately 1:31 A.M and crossed the George Washington Bridge southbound into New Jersey at approximately 2:00 A.M.

50. Location information for the DUDLEY -4877 number revealed that the number was present near the location of the Armonk Shop at the time of the

Armonk Burglary. Specifically, the DUDLEY -4877 number revealed that the number was located approximately two miles from the Armonk Shop at 1:14 A.M. and in New Jersey at 2:33 A.M.

**The July 20, 2024 Burglary in Livingston, New Jersey**

51. On July 20, 2024, at 1:41 A.M., the Livingston Shop was burglarized again. Surveillance footage shows that four Perpetrators dressed in dark attire with black ski masks exited a black Toyota Camry, later confirmed to bear Virginia Registration Number -----74 (the “Camry”), and stole numerous items from the Livingston Shop before fleeing. Rental car records obtained for the Camry showed that HAYES rented the vehicle at the time of the July 20 Burglary.

52. Call detail records for the HAYES -3466 number show that the number made calls close to the Livingston Burglary. Specifically, the HAYES -3466 number made calls in a location in Northern New Jersey consistent with the route to the Livingston Shop approximately 15 minutes prior to the time of the burglary on July 20, 2024.

53. Later on July 20, 2024, GALLMON sent Individual-2 a message on Social Media Platform-1, stating “[d]o u take these?” and sent photographs of three designer handbags, including a Chanel purse. Individual-2 responded, “[p]ricing?” and the two engaged in a back-and-forth discussion about sale prices for the three bags and arranging a time and place to meet. The investigation revealed that the three handbags in the photographs GALLMON sent on July 20, 2024 were stolen from the Livingston Shop.

**The September 24, 2024 Burglaries in Philadelphia, Pennsylvania and Reisterstown, Maryland**

54. On September 24, 2024, at approximately 3:07 A.M., law enforcement responded to a burglary in progress at a consignment shop in Philadelphia, Pennsylvania (the “Philadelphia Shop”). Three Perpetrators smashed the glass doors to gain entry and ransacked numerous items, including designer handbags.

55. Approximately one hour and forty-five minutes later at 4:55 A.M., law enforcement responded to a burglary in progress at a consignment shop in Reisterstown, Maryland. Surveillance video shows two Perpetrators breaking the window of the front door of the shop to gain entry, and then breaking the glass cases inside of the store. The Perpetrators stole numerous designer handbags and other items from the Maryland Shop before fleeing on foot.

56. Location information for the HAYES -3466 number revealed that the number was present near the location of Philadelphia Shop at the time of the



burglary. Specifically, the HAYES -3466 number was located approximately one mile away from the Philadelphia Shop at approximately 3:01 A.M., and was located in Maryland at approximately 3:54 A.M.

**The November 21, 2024 Burglary in Branchville, New Jersey**

57. On November 21, 2024, at 1:50 A.M. law enforcement responded to a burglary in progress at a consignment shop in Branchville, New Jersey (the “Branchville Burglary”). Surveillance footage shows that three men dressed in dark clothing used a crowbar to break the window of the retail shop and then stole designer handbags and other items.

58. Later on November 21, 2024, GALLMON sent a message via Social Media Platform-1 to Individual-2, stating “[a]ye you out va?” Individual-2 responded, “[h]ello. Yes. If selling, pls send pics. Thanks.” GALLMON responded, “[c]an I come now?” and sent a video of several designer handbags and sunglasses. Individual-2 responded, “[c]hecking now. One sec pls,” and also stated, “[c]an you come at noon?” GALLMON responded, “here.” The investigation revealed that the items in the video GALLMON sent to Individual-2 were stolen during the Branchville Burglary.

59. During the investigation, law enforcement obtained phone records that indicate that the HAYES -3466 number and the DUDLEY -4877 number communicated with each other through phone calls at approximately 3:51 and 9:17 P.M. on November 21, 2024.

60. Location information for the HAYES -3466 number revealed that the number was in close proximity to the Branchville Burglary and subsequently traveled southbound into Delaware. Specifically, the HAYES -3466 number was located approximately six miles away from the consignment shop in Branchville, New Jersey at approximately 1:35 A.M. and in Delaware near the Delaware Memorial Bridge at 4:33 A.M.