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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

TREMONE BURNETT,  
a/k/a "Hassan Thomas"

: Hon. Katharine S. Hayden  
:  
:  
: Crim. No. 16- 66  
:  
:  
: 18 U.S.C. § 1951(a)  
: 18 U.S.C. § 924(c)(i)(A)(ii)  
: 18 U.S.C. § 924(c)(i)(A)(iii)

**INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

**COUNT ONE**  
**(Hobbs Act Conspiracy)**

1. From at least in or about April 2014 through in or about June 2014, in Bergen, Essex, Hudson, Hunterdon, Middlesex, and Morris Counties, in the District of New Jersey, and elsewhere, defendant

TREMONE BURNETT,  
a/k/a "Hassan Thomas,"

did unlawfully conspire and agree with others to obstruct, delay, and affect interstate commerce and the movement of articles and commodities in interstate commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951, and to commit and threaten physical violence to persons and property in furtherance thereof.

**OBJECT**

2. It was the object of this conspiracy to obtain money and other things of value by force from the employees of businesses engaged in interstate commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

**MANNER AND MEANS OF THE CONSPIRACY**

3. It was a part of the conspiracy that defendant TREMONE BURNETT and others agreed to rob hotels whose activities moved in and affected interstate commerce (the "Hotels") at gunpoint, including the following Hotels on or about the following dates:

<b>Approximate Date</b>	<b>Hotel</b>	<b>Approximate Location</b>
April 24, 2014	Howard Johnson	Newark, New Jersey
May 7, 2014	Comfort Suites	Woodbridge, New Jersey
May 9, 2014	Marriott Fairfield Suites	Parsippany, New Jersey
May 9, 2014	Best Western	Rockaway, New Jersey
May 9, 2014	Crowne Plaza	Paramus, New Jersey
May 31, 2014	Extended Stay America	Secaucus, New Jersey
May 31, 2014	Sheraton	Weehawken, New Jersey
June 4, 2014	Howard Johnson	Airmont, New York

June 4, 2014	Comfort Inn	Edison, New Jersey
June 8, 2014	Marriott	Lebanon, New Jersey
June 13, 2014	Hilton Garden Inn	Nanuet, New York
June 15, 2014	Hotel Executive Suites	Carteret, New Jersey
June 15, 2014	Fairfield Inn	Newark, New Jersey
June 19, 2014	Comfort Suites	Newark, New Jersey

4. It was further part of the conspiracy that defendant TREMONE BURNETT and others used a firearm to forcibly take property from employees of the Hotels.

5. It was further part of the conspiracy that defendant TREMONE BURNETT and others used zip-ties to restrain employees of the Hotels during the commission of several of the robberies.

6. It was further part of the conspiracy that:

a. On or about April 24, 2014, defendant TREMONE BURNETT and a coconspirator entered and robbed a Howard Johnson hotel, located in or around Newark, New Jersey, and, during the course of the robbery, defendant TREMONE BURNETT possessed and brandished a firearm.

b. On or about May 7, 2014, defendant TREMONE BURNETT entered and robbed a Comfort Suites hotel, located in or around

Woodbridge, New Jersey, and, during the course of the robbery, defendant TREMONE BURNETT possessed and brandished a firearm.

c. On or about May 9, 2014, defendant TREMONE BURNETT entered and robbed a Marriott Fairfield Suites hotel, located in or around Parsippany, New Jersey, and, during the course of the robbery, defendant TREMONE BURNETT possessed and brandished a firearm.

d. On or about May 9, 2014, defendant TREMONE BURNETT entered and robbed a Best Western hotel, located in or around Rockaway, New Jersey, and, during the course of the robbery, defendant TREMONE BURNETT possessed and brandished a firearm.

e. On or about May 9, 2014, defendant TREMONE BURNETT entered and robbed a Crowne Plaza hotel, located in or around Paramus, New Jersey, and, during the course of the robbery, defendant TREMONE BURNETT possessed and brandished a firearm.

f. On or about May 31, 2014, defendant TREMONE BURNETT entered and robbed an Extended Stay America hotel, located in or around Secaucus, New Jersey, and, during the course of the robbery, defendant TREMONE BURNETT possessed and brandished a firearm.

g. On or about May 31, 2014, defendant TREMONE BURNETT entered and robbed a Sheraton hotel, located in or around Weehawken, New Jersey, and, during the course of the robbery, defendant TREMONE BURNETT possessed and discharged a firearm.

h. On or about June 4, 2014, defendant TREMONE BURNETT and a coconspirator entered and robbed a Howard Johnson hotel, located in or around Airmont, New York, and, during the course of the robbery, defendant TREMONE BURNETT possessed and brandished a firearm.

i. On or about June 4, 2014, defendant TREMONE BURNETT entered and robbed a Comfort Inn hotel, located in or around Edison, New Jersey, and, during the course of the robbery, defendant TREMONE BURNETT possessed and brandished a firearm.

j. In the course of the robbery, defendant TREMONE BURNETT used zip-ties to restrain the victim employees of the Comfort Inn hotel.

k. On or about June 8, 2014, defendant TREMONE BURNETT and a coconspirator entered and robbed a Marriott hotel, located in or around Lebanon, New Jersey, and, during the course of the robbery, defendant TREMONE BURNETT possessed and brandished a firearm.

l. In the course of the robbery, defendant TREMONE BURNETT used zip-ties to restrain a victim employee of the Marriott hotel.

m. On or about June 13, 2014, defendant TREMONE BURNETT and a coconspirator entered and robbed a Hilton Garden Inn hotel, located in or around Nanuet, New <sup>York</sup> ~~Jersey~~, and, during the course of the robbery, defendant TREMONE BURNETT possessed and brandished a firearm. BAK

n. In the course of the robbery, defendant TREMONE BURNETT used zip-ties to restrain victim employees of the Hilton Garden Inn hotel.

o. On or about June 15, 2014, defendant TREMONE BURNETT entered and robbed a Hotel Executive Suites hotel, located in or around Carteret, New Jersey, and, during the course of the robbery, defendant TREMONE BURNETT possessed and brandished a firearm.

p. In the course of the robbery, defendant TREMONE BURNETT used zip-ties to restrain a victim employee of the Hotel Executives Suites hotel.

q. On or about June 15, 2014, defendant TREMONE BURNETT entered and robbed a Fairfield Inn hotel, located in or around Newark, New Jersey, and, during the course of the robbery, defendant TREMONE BURNETT possessed and brandished a firearm.

r. On or about June 19, 2014, defendant TREMONE BURNETT entered and robbed a Comfort Suites hotel, located in or around Newark, New Jersey, and, during the course of the robbery, defendant TREMONE BURNETT possessed and brandished a firearm.

s. In the course of the robbery, defendant TREMONE BURNETT used zip-ties to restrain a victim employee of the Comfort Suites hotel.

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

**COUNT TWO**  
**(Hobbs Act Robbery)**

1. At all times relevant to this Indictment, Best Western International, Inc., was a hospitality services company that owned and operated a hotel located in or around Rockaway, New Jersey, which provided hospitality services that moved in and affected interstate commerce and engaged in an industry that affects interstate commerce.

2. On or about May 9, 2014, in Morris County, in the District of New Jersey, and elsewhere, defendant

TREMONE BURNETT,  
a/k/a "Hassan Thomas,"

did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, interstate commerce and the movement of articles and commodities in such interstate commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain a sum of United States currency and other items from the persons of and in the presence of employees of the Best Western hotel in or around Rockaway, New Jersey, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their custody and possession.

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

**COUNT THREE**  
**(Use of a Firearm During a Crime of Violence)**

On or about May 9, 2014, in Morris County, in the District of New Jersey, and elsewhere, defendant

TREMONE BURNETT,  
a/k/a "Hassan Thomas,"

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

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



**COUNT FOUR**  
**(Hobbs Act Robbery)**

1. At all times relevant to this Indictment, Starwood Hotels was a hospitality services company that owned and operated a Sheraton hotel located in or around Weehawken, New Jersey, which provided hospitality services that moved in and affected interstate commerce and engaged in an industry that affects interstate commerce.

2. On or about May 31, 2014, in Hudson County, in the District of New Jersey, and elsewhere, defendant

TREMONE BURNETT,  
a/k/a "Hassan Thomas,"

did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, interstate commerce and the movement of articles and commodities in such interstate commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain a sum of United States currency and other items from the persons of and in the presence of employees of the Sheraton hotel in or around Weehawken, New Jersey, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their custody and possession.

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

**COUNT FIVE**  
**(Use of a Firearm During a Crime of Violence)**

On or about May 31, 2014, in Hudson County, in the District of New Jersey, and elsewhere, defendant

TREMONE BURNETT,  
a/k/a "Hassan Thomas,"

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

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

**COUNT SIX**  
**(Hobbs Act Robbery)**

1. At all times relevant to this Indictment, Marriott International was a hospitality services company that owned and operated a Fairfield Inn hotel located in or around Newark, New Jersey, that provided hospitality services that moved in and affected interstate commerce and engaged in an industry that affects interstate commerce.

2. On or about June 15, 2014, in Essex County, in the District of New Jersey, and elsewhere, defendant

TREMONE BURNETT,  
a/k/a "Hassan Thomas,"

did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, interstate commerce and the movement of articles and commodities in such interstate commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain a sum of United States currency and other items from the persons of and in the presence of employees of the Fairfield Inn hotel in or around Newark, New Jersey, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their custody and possession.

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

**COUNT SEVEN**  
**(Use of a Firearm During a Crime of Violence)**

On or about June 15, 2014, in Essex County, in the District of New Jersey, and elsewhere, defendant

TREMONE BURNETT,  
a/k/a "Hassan Thomas,"

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

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

**FORFEITURE ALLEGATION**

1. The allegations contained in this Indictment are hereby incorporated and realleged by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

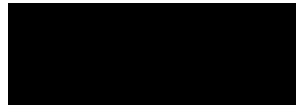
2. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses alleged in this Indictment, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the commission of any such offenses.

3. If by any act or omission of the defendant any of the property subject to forfeiture described above:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the above-described forfeitable property.

A TRUE BILL



For person



PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 16-66 (KSH)

**United States District Court  
District of New Jersey**

**UNITED STATES OF AMERICA**

v.

**TREMONE BURNETT,  
a/k/a "Hassan Thomas"**

**INDICTMENT FOR**

18 U.S.C. § 1951(a)  
18 U.S.C. § 924(c)(1)(A)(ii)  
18 U.S.C. § 924(c)(1)(A)(iii)

**A True Bill,**

**Foreperson**

**PAUL J. FISHMAN**  
**UNITED STATES ATTORNEY**  
**NEWARK, NEW JERSEY**

**BARRY A. KAMAR**  
**ASSISTANT U.S. ATTORNEY**  
**973-645-2906**