

ATTACHMENT A

COUNT ONE

(Hobbs Act Robbery)

On or about February 28, 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

RAYMOND SCURA,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce, by robbery, and committed and threatened physical violence to persons and property in furtherance thereof.

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

COUNT TWO

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

On or about February 28, 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

RAYMOND SCURA,

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically, the robbery charged in Count One of this Criminal Complaint, did knowingly use and carry a firearm, which was brandished.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and Section 2.

ATTACHMENT B

I, Thomas R. Regina, 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, and items of 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.

1. The FBI is investigating an armed robbery that took place on or about February 28, 2019, in Essex County, New Jersey. To date, the investigation has included but is not limited to witness interviews, a review of surveillance footage, bank records, and other evidence.

2. At all times relevant to this Criminal Complaint, the "Victim" owned and operated an internet-based business (the "Business") that engaged and affected interstate and foreign commerce.

3. In or around February 2019, defendant Raymond Scura ("SCURA") was a customer of the Business.

4. In or around February 2019, SCURA wrote a fraudulent check ("Check 1") to the Victim for services rendered by the Business. The Victim attempted to deposit the check but learned that the account underlying the check written by SCURA did not exist and therefore had no assets.

5. Soon thereafter, SCURA and the Victim met at a location in Essex County, New Jersey ("Location 1"). SCURA wrote a second fraudulent check ("Check 2") to the Victim for services rendered by the Business. The Victim refused to accept Check 2 and insisted that SCURA pay in cash.

6. SCURA and the Victim then drove together from Location 1 to a bank (the "Bank") in Essex County, New Jersey. Outside of the Bank, SCURA brandished a firearm and demanded that the Victim deposit a third fraudulent check ("Check 3") into the Victim's account and withdraw it for SCURA. SCURA stated, in sum and substance, "You're going to listen to what I say. You're going to put this . . . check into your account and then you're going to take [the money] out of your account. Don't tell anybody or I will go to your house and kill you and your family."

7. SCURA subsequently led the Victim to an ATM inside the Bank, where SCURA directed the Victim to insert the Victim's banking card. SCURA

then asked the Victim for the Victim's PIN, entered the PIN himself, and deposited Check 3 into the ATM.

8. SCURA then led the Victim to a teller window at the Bank to withdraw the same amount of money as set forth in Check 3.

9. SCURA and the Victim left the Bank, where SCURA again brandished the firearm and demanded that the Victim hand over the cash withdrawn at the Bank. The Victim complied.

10. In or around March 2019, SCURA sent the Victim approximately \$3,000 over internet-based payment services through a third-party account.