
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : CRIMINAL COMPLAINT
 :
v. :
 :
 : Mag. No. 19-1537 (DEA)
OMAR FELICIANO-ESTREMER, and :
GABRIEL LOPEZ :
 :

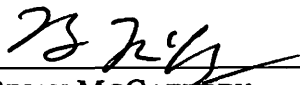
I, Brian McCaffery, being duly sworn, state that the following is true and correct to the best of my knowledge and belief. On or about the date set forth in Attachment A to this complaint, in the District of New Jersey and elsewhere:

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:

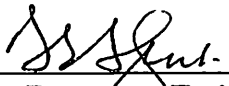
SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



BRIAN MCCAFFERY
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE
JUNE 17, 2019
TRENTON, NEW JERSEY



HON. DOUGLAS E. ARPERT
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A
(Hobbs Act Robbery)

On or about June 16, 2019, in Mercer County, in the District of New Jersey, and elsewhere, the defendants,

OMAR FELICIANO-ESTREMERERA and GABRIEL LOPEZ,

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 or threatened physical violence to persons or property in furtherance thereof,

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

ATTACHMENT B

I, Brian McCaffery, have been a Special Agent with the Federal Bureau of Investigation ("FBI") since 2009. The information contained in this complaint is based on my personal knowledge and on information obtained from other sources, including statements made or reported by various witnesses with knowledge of relevant facts and my review of documents and evidence obtained through court orders, subpoenas, and other sources. Because this complaint is submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. Where the contents of documents and the actions, statements, and conversations of individuals are recounted herein, they are recounted in sum and substance and in part, and the statements set forth herein are based on preliminary summaries and quotations of those communications.

1. Law enforcement has been investigating a series of armed robberies taking place in and around Trenton, New Jersey, and surrounding communities in New Jersey and Pennsylvania, during 2019. On May 8, 2019, law enforcement responded to a report of an armed robbery of a convenience store in Trenton, New Jersey ("Business 1"). The store clerk, who had been robbed ("Victim 1") reported that the store had been robbed by a White or Hispanic male, who displayed a black handgun. The robbery was captured by Business 1's surveillance camera, which revealed that the robber was wearing a baseball cap and a hooded sweatshirt or "hoodie," with the hood pulled up over the cap. An exterior surveillance camera near Business 1 captured the robber returning immediately after the robbery to a Honda Odyssey Minivan (the "Minivan"), which was later identified using New Jersey Motor Vehicle Commission records as belonging to OMAR FELICIANO-ESTREMERERA.

2. On May 15, 2019, law enforcement conducted physical surveillance of FELICIANO-ESTREMERERA driving the Minivan. Law enforcement observed FELICIANO-ESTREMERERA drive to multiple convenience stores, as well as other commercial enterprises in the area of Trenton, New Jersey, and observed him engaging in conduct consistent with surveilling or "casing" potential robbery targets, including driving slowly by or sitting outside of stores without entering them or purchasing anything.

3. Law enforcement continued to investigate FELICIANO-ESTREMERERA, and, on June 12, 2019, obtained a court order to track FELICIANO-ESTREMERERA's cellular phone.

4. On June 16, 2019, law enforcement, reviewing the tracking data, observed that FELICIANO-ESTREMERERA's phone was present in the vicinity of and moving between the locations of multiple convenience stores in

communities surrounding Trenton, New Jersey. Responding to the phone's location, law enforcement observed the Minivan and established physical surveillance. Law enforcement followed the Minivan to a convenience store in Bordentown, New Jersey. Law enforcement observed the Minivan pull around the corner from the store and park on a side street. At that moment, however, a marked Bordentown Police vehicle, unrelated to the investigation, pulled into the store's parking lot. After the police vehicle's arrival, the Minivan left the area.

5. Law enforcement followed the Minivan, but was unable to maintain physical surveillance. Law enforcement then reviewed the tracking data for FELICIANO-ESTREMERAS phone and proceeded to the phone's location near another convenience store. At that location, law enforcement again observed the Minivan and reestablished surveillance. Law enforcement followed the Minivan to a convenience store in Hamilton, New Jersey ("Business 2"). The Minivan pulled down a dark street near Business 2 and parked. Law enforcement observed an individual, later identified as GABRIEL LOPEZ, a Hispanic male, emerge from the area where the Minivan was parked and walk into the parking lot of Business 2. Law enforcement observed that LOPEZ was wearing a baseball cap and a hoodie, with the hood pulled up, despite that fact that it was a warm evening. LOPEZ waited in the parking lot as a customer exited the store, got into a vehicle parked in the lot, and drove away. After the customer had driven away, law enforcement observed LOPEZ enter Business 2.

6. LOPEZ reemerged from Business 2 approximately less than two minutes after entering and quickly walked through the parking lot toward the street where the Minivan was parked. Law enforcement observed that LOPEZ was carrying a bag as he exited Business 2. Once LOPEZ left the parking lot, he broke into a jog toward the Minivan. Law enforcement determined to question LOPEZ and approached LOPEZ and the Minivan to initiate a stop.

7. Law enforcement officers activated their police lights just as LOPEZ reached the Minivan. LOPEZ turned and observed the police vehicle with its lights activated and fled on foot into a nearby wooded area. Law enforcement officers pursued LOPEZ on foot into the woods. Officers caught up to LOPEZ, who verbally threatened to shoot an officer. LOPEZ was then placed under arrest. Law enforcement searched the wooded area through which they had pursued LOPEZ and found the bag that they had observed LOPEZ carrying out of Business 2. Near the bag, they also found a black, Smith & Wesson handgun.

8. Law enforcement placed FELICIANO-ESTREMERAS, who was seated in the driver's seat of the Minivan under arrest.

9. Law enforcement reviewed surveillance video from Business 2, showing LOPEZ robbing the store's clerk ("Victim 2"). Victim 2 provided a description of the robber matching LOPEZ's description, and reported that the robber had displayed a black handgun and demanded money from the store's register.