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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA	:	Honorable Joseph A. Dickson
	:	
v.	:	Mag. No. 20-8198
	:	
MALIK BAKER,	:	<b>AMENDED CRIMINAL COMPLAINT</b>
a/k/a "Smack,"	:	
a/k/a "Mu,"	:	<b>Filed Under Seal</b>
HAKEEM SMITH	:	
a/k/a "B.A.,"	:	
a/k/a "Hak,"	:	
NAFIQUE GOODWYN, and	:	
BILAL CURETON	:	


I, Michael Rutkowski, 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 this Complaint is based on the following facts:

SEE ATTACHMENT B


continued on the attached page and made a part hereof.

  
\_\_\_\_\_  
Michael Rutkowski  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed via telephone,  
January 12, 2021, at Essex County, New Jersey

Authorized telephonically pursuant to Fed. R. Crim. P. Rule 4.1

HON. JOSEPH A. DICKSON  
United States Magistrate Judge

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**Count One**  
**(Conspiracy to Receive Stolen Vehicles)**

Between on or about July 22, 2019, and October 4, 2019, in Essex County, in the District of New Jersey, and elsewhere, defendants

**MALIK BAKER,**  
**a/k/a “Smack,”**  
**a/k/a “Mu,”** and  
**HAKHEEM SMITH**  
**a/k/a “B.A.,”**  
**a/k/a “Hak,”**

knowingly and intentionally conspired with each other and others to receive, possess, conceal, store, barter, sell, and dispose of motor vehicles, which had crossed State boundaries after being stolen, knowing the same to have been stolen, contrary to Title 18, United States Code, Section 2313.

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

**Count Two**  
**(Conspiracy to Transport Stolen Vehicles)**

Between on or about August 3, 2019, and August 7, 2019, in the District of New Jersey, and elsewhere, defendants

**MALIK BAKER,**  
**a/k/a "Smack,"**  
**a/k/a "Mu,"**  
**HAKHEEM SMITH**  
**a/k/a "B.A.,"**  
**a/k/a "Hak,"**  
**NAFIQUE GOODWYN, and**  
**BILAL CURETON**

knowingly and intentionally conspired with each other and others to transport in interstate commerce motor vehicles, knowing same to have been stolen, contrary to Title 18, United States Code, Section 2312.

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

**Count Three**  
**(Receipt of Stolen Vehicles)**

Between on or about July 22, 2019, and August 1, 2019, in Essex County, in the District of New Jersey, and elsewhere, defendants

**MALIK BAKER,**  
**a/k/a “Smack,”**  
**a/k/a “Mu,” and**  
**HAKEEM SMITH**  
**a/k/a “B.A.,”**  
**a/k/a “Hak,”**

knowingly and intentionally received, possessed, concealed, stored, and disposed of a motor vehicle, namely a 2017 BMW Alpina, with the last four digits of the true Vehicle Identification Number assigned that vehicle being 3744, which had crossed State boundaries after being stolen, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2313.

**Count Four**  
**(Transportation of Stolen Vehicle)**

Between on or about August 6, 2019, and August 7, 2019, in the District of New Jersey, and elsewhere, defendant

**HAKEEM SMITH**  
**a/k/a "B.A.,"**  
**a/k/a "Hak"**

did knowingly transport in interstate commerce a motor vehicle, namely a 2019 Porsche Cayenne, with last four digits of the true Vehicle Identification Number assigned that vehicle being 4675, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2312 and Section 2.

## **ATTACHMENT B**

I, Michael Rutkowski, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts herein based on my own investigation, my conversations with witnesses, other law enforcement officers, and my review of reports, documents, and items of evidence. Because this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to me and other investigators concerning the investigation. Where statements of others are related herein, they are related in substance and in 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.

1. At all times relevant to this Complaint, defendant MALIK BAKER resided at an address in Vauxhall, New Jersey.
2. At all times relevant to this Complaint, defendant HAKEEM SMITH resided at an address in Newark, New Jersey.
3. At all times relevant to this Complaint, defendant NAFIQUE GOODWYN resided at an address in Newark, New Jersey.
4. At all times relevant to this Complaint, defendant BILAL CURETON resided at an address in Essex County, New Jersey.
5. Since as early as July 2019, the Federal Bureau of Investigation ("FBI") and several local police departments (collectively, "law enforcement") have been investigating a series of high-end car thefts that occurred in towns in New York, Connecticut, and New Jersey. During the investigation, law enforcement observed at least ten high-end stolen cars hidden at one particular location behind 105 Ellis Avenue in Irvington, New Jersey ("105 Ellis") at various times after the cars were stolen.
6. In particular, between in or around July 2019 and September 2019, law enforcement observed the following stolen vehicles hidden behind 105 Ellis:
  - a. On several occasions between on or about July 19, 2019, and July 22, 2019, a 2019 BMW X4 M40i, with last four digits of the true Vehicle Identification Number ("VIN") assigned to that vehicle being 3298, which was reported stolen from an address in Greenwich, Connecticut on or about July 19, 2019;
  - b. On several occasions between on or about July 25, 2019, and July 31, 2019, a 2017 BMW Alpina, with last four digits of the true VIN

assigned to that vehicle being 3744, which was reported stolen from an address on Everit Avenue in Hewlett Bay Park, New York on or about July 22, 2019;

- c. On or about August 1, 2019, law enforcement observed a 2016 Mercedes Benz Maybach S600, with last four digits of the true VIN assigned to that vehicle being 7965, which was reported stolen from an address in Clifton, New Jersey on or about August 1, 2019;
- d. On or about August 7, 2019, law enforcement observed a 2019 Porsche Cayenne, with last four digits of the true VIN assigned to that vehicle being 4675, which was reported stolen from an address in New City, New York on or about August 6, 2019;
- e. On or about August 13, 2019, law enforcement observed a 2017 Mercedes Benz S550, with last four digits of the true VIN assigned to that vehicle being 9680, which was reported stolen from an address on Everit Avenue in Hewlett Bay Park, New York on or about August 13, 2019;
- f. On or about August 22, 2019, law enforcement observed a 2019 Land Rover, with last four digits of the true VIN assigned to that vehicle being 5595, which was reported stolen from an address in Kensington, New York on or about August 22, 2019;
- g. On or about August 29, 2019, law enforcement observed a 2019 Mercedes Benz Maybach, with last four digits of the true VIN assigned to that vehicle being 8290, which was reported stolen from an address in Quogue, New York on or about August 29, 2019;
- h. On or about August 29, 2019, law enforcement observed a 2014 Lexus GS, with last four digits of the true VIN assigned to that vehicle being 1273, which was reported stolen from an address in West Long Branch, New Jersey on or about August 29, 2019;
- i. On or about September 7, 2019, law enforcement observed a 2017 BMW M4, with last four digits of the true VIN assigned to that vehicle being 4314, which was reported stolen out of Marlton, New Jersey on or about September 7, 2019; and
- j. On or about September 10, 2019, law enforcement observed a 2017 Mercedes Benz AMG S63, with last four digits of the true VIN assigned to that vehicle being 2016, which was reported stolen from an address in Orangeburg, New York on or about September

10, 2019.

(collectively, the “105 Ellis cars”).

7. As set forth in more detail below, HAKEEM SMITH, MALIK BAKER, NAFIQUE GOODWYN, BILAL CURETON and others, known and unknown, (collectively, the “Co-conspirators”) have been stealing or conspiring to steal the 105 Ellis cars and other high-end vehicles from towns in New York, Connecticut, and New Jersey, and transport such vehicles across state lines. Law enforcement has observed the Co-conspirators in the vicinity of 105 Ellis and in and around the 105 Ellis cars after the 105 Ellis cars were stolen. Additionally, other surveillance, In-Vehicle Infotainment (“IVI”)<sup>1</sup> data, and court-authorized phone data indicates that the Co-conspirators transported or conspired to transport the 105 Ellis cars and other stolen cars across state lines after stealing them.

BMW Alpina, stolen from Hewlett Bay Park, New York on July 22, 2019

8. On or about July 22, 2019, at an address on Everit Avenue in Hewlett Bay Park, New York, the Co-conspirators stole a 2017 BMW Alpina, with a New York registration, and with last four digits of the true VIN assigned to that vehicle being 3744 (the “3744 BMW”).

9. According to the 3744 BMW’s IVI data, on or about July 22, 2019, the Co-conspirators drove the 3744 BMW west into New York City, crossed the Goethals Bridge into New Jersey, and then, at approximately 5:28 a.m., they parked the 3744 BMW near 92 Montgomery Avenue in Irvington, NJ (“92 Montgomery”) (approximately two blocks away from 105 Ellis).

10. Court-authorized location data obtained from a cell phone known to be used by HAKEEM SMITH (“SMITH’s Cell Phone”) indicates that SMITH’s Cell Phone was being used in the vicinity of 92 Montgomery at various times when the 3744 BMW was at 92 Montgomery from on or about July 22 to July 24, 2019.

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<sup>1</sup> IVI refers to a vehicle’s system that combines entertainment and information delivery to drivers and passengers. IVI systems use audio/visual interfaces, touchscreens, keypads, and other types of devices to provide these types of services. IVI systems typically include standard radio players, GPS navigation systems, and hands-free phone connections. Another major IVI component is mobile device connectivity, which allows drivers and passengers to connect their cellular devices, including smartphones and tablets, to a vehicle. IVI systems are capable of storing and saving data from cellular devices that are connected to the IVI. IVI systems also store GPS data that shows the location of the vehicle, along with the date and time the vehicle was at a particular location.



11. On or about July 25, 2019, law enforcement observed the 3744 BMW parked behind 105 Ellis. At the same time, law enforcement observed two Co-conspirators (one who was wearing a ski mask) exit the 3744 BMW wearing hooded sweatshirts and gloves.

12. According to the 3744 BMW's IVI data, between on or about July 25 and August 1, 2019, the Co-conspirators drove the 3744 BMW throughout New Jersey and into Long Island, New York. Additionally, on or about July 27, 2019, SMITH's Cell Phone made a call to a cell phone known to be used by BILAL CURETON ("CURETON's Cell Phone"). Shortly after midnight, on or about July 28, 2019, SMITH's Cell Phone and CURETON's Cell Phone exchanged several calls.

13. On or about July 28, 2019, law enforcement observed the 3744 BMW parked behind 105 Ellis again. At the same time, law enforcement observed an individual fitting the description of HAKEEM SMITH and two other unknown Co-conspirators behind 105 Ellis congregating around the 3744 BMW. The Co-conspirators then proceeded to cover the front and top of the 3744 BMW with a vehicle cover. Court-authorized location data from SMITH's Cell Phone and a cell phone known to be used by MALIK BAKER ("BAKER's Cell Phone") indicates that SMITH's Phone and BAKER's phone were being used in the vicinity of 105 Ellis at various times when the 3744 BMW was at 105 Ellis on or about July 28, 2019.

14. On or about July 31, 2019, at approximately 3:08 a.m., the Co-conspirators drove the 3744 BMW through an EZ Pass toll lane without paying the toll at the Camden/Philadelphia exit on the New Jersey Turnpike. At approximately 6:44 a.m., while BAKER's Cell Phone was in the vicinity of Jamesburg, New Jersey, along the New Jersey Turnpike, it made a phone call to SMITH's Cell Phone. At approximately 7:26 a.m., law enforcement observed the 3744 BMW parked behind 105 Ellis again. They observed an individual fitting the description of MALIK BAKER outside of the 3744 BMW carrying a backpack with what appeared to be bolt cutters sticking out of the backpack. They also observed standing around the 3744 BMW an individual fitting the description of BILAL CURETON and another unknown Co-conspirator wearing a black hooded sweatshirt with white stripes on the sleeves and a black ski mask. At approximately 7:40 a.m., while in the vicinity of 105 Ellis, SMITH's Cell Phone made a phone call to BAKER's Cell Phone. At approximately 7:28 a.m., BAKER's Cell Phone was used to take a picture of the 3744 BMW.

15. On or about August 1, 2019, law enforcement located and recovered the 3744 BMW in Englishtown, New Jersey. The 3744 BMW was damaged and abandoned. Law enforcement subsequently processed the vehicle for forensic evidence, including collecting various items located in the 3744 BMW that contained DNA. A search of a law enforcement database indicated a possible DNA association between a DNA sample recovered from

the 3744 BMW and the DNA of HAKEEM SMITH.

16. The 3744 BMW's IVI data indicates that cell phones used by HAKEEM SMITH, MALIK BAKER, and another Co-conspirator were connected to the 3744 BMW's IVI system at various times after it was stolen, and as late as August 1, 2019.

17. On or about August 2, 2019, at approximately 2:15 a.m., law enforcement observed an individual fitting the description of BILAL CURETON at 105 Ellis. Just two days later, on or about August 3, 2019, law enforcement again observed an individual fitting the description of BILAL CURETON at 105 Ellis standing around a 2016 Mercedes Benz Maybach S600, which was reported stolen from an address in Clifton, New Jersey on or about August 1, 2019, along with two other unknown Co-conspirators. BILAL CURETON appeared to be carrying a car jack and working on the Maybach S600.

Mercedes Benz S550 and Rolls Royce, stolen from Hewlett Bay Park, New York on August 13, 2019

18. On or about August 13, 2019, the Co-conspirators stole a 2017 Mercedes Benz S550, with New York registration, and last four digits of the true VIN assigned to that vehicle being 9680 (the "9680 Mercedes S550"), and a 2019 Rolls Royce, with New York registrations, and last four digits of the true VIN assigned to that vehicle being 3938 (the "3938 Rolls Royce"), from the garage of a home on Everit Avenue in Hewlett Bay Park, New York (less than a half-mile from where the Co-conspirators stole the 3744 BMW).

19. Security video from the owner of the 9680 Mercedes S550 and the 3938 Rolls Royce shows that at approximately 2:49 a.m., a dark four-door sedan pulled up to the driveway and an unknown Co-conspirator wearing a face covering exited the sedan. The Co-conspirator entered a 2018 white BMW and took the garage door remote opener out of the BMW. The Co-conspirator used the remote to open the garage where the 9680 Mercedes S550 and the 3938 Rolls Royce were parked. At approximately 2:50 a.m., two other unknown Co-conspirators got into the 9680 Mercedes S550 and the 3938 Rolls Royce and drove them away.

20. At approximately 5:08 a.m., law enforcement observed the 9680 Mercedes S550 parked behind 105 Ellis. That same day, law enforcement placed a court-authorized GPS tracking device on the 9680 Mercedes S550.

21. On or about August 15, 2019, the GPS tracking device on the 9680 Mercedes S550 indicated that the car was located in the Bronx, New York. Indeed, on that date, law enforcement observed the 9680 Mercedes S550 parked at a location in the Bronx, New York, bearing a fictitious Delaware license plate.

22. On or about August 16, 2019, the GPS tracking device on the 9680 Mercedes S550 indicated that the car moved from the Bronx to the Port of Newark in New Jersey. SMITH's Cell Phone was also in the vicinity of the Port of Newark on that day between approximately 10:36 a.m. and 12:06 p.m.

23. On or about August 20, 2019, law enforcement recovered the 9680 Mercedes S550, which was located inside of a shipping container that was scheduled to be shipped to Ghana, Africa.

#### Maserati, stolen from Manalapan, New Jersey on August 5, 2019

24. In the early morning hours of on or about August 5, 2019, at an address in Manalapan, New Jersey, the Co-conspirators, including MALIK BAKER, stole a 2017 Maserati GranTurismo, with a New Jersey registration, and with last four digits of the true VIN assigned to that vehicle being 6606 (the "6606 Maserati").

25. From approximately 6:30 a.m. to 7:03 a.m., on the morning that the 6606 Maserati was stolen, BAKER's Cell Phone was travelling in the vicinity of Manalapan, New Jersey, then moved northbound on Route 1. Additionally, at approximately 7:03 a.m., BAKER's Cell Phone was used to take a picture of the temporary registration card located inside of the 6606 Maserati, which was located in the 6606 Maserati at the time it was stolen. At approximately 4:12 p.m., BAKER's Cell Phone was used to take a picture of the 6606 Maserati's car keys, which were also located in the 6606 Maserati at the time it was stolen.

26. BAKER's Cell Phone and SMITH's Cell Phone were both in the vicinity of 105 Ellis and 92 Montgomery throughout the day on or about August 5, 2019. As discussed further below, HAKEEM SMITH, MALIK BAKER, and the Co-conspirators drove the 6606 Maserati across state lines to New City, New York, in order to steal additional high-end cars.

#### Range Rover, stolen from New City, New York, on August 6, 2019

27. On or about August 6, 2019, shortly after midnight, at an address in New City, New York, the Co-conspirators stole a 2018 Range Rover with a New York registration, and with last four digits of the true VIN assigned to that vehicle being 5241 (the "5241 Range Rover").

28. Surveillance video shows that at approximately 1:26 a.m., the 5241 Range Rover and the 6606 Maserati pull into a gas station in Spring Valley, New York, which borders New City. The 5241 Range Rover was being driven by an unknown Co-conspirator wearing what appeared to be the same black hooded sweatshirt with white stripes on the sleeves previously observed on a Co-conspirator outside of 105 Ellis. At approximately 1:27 a.m., an

individual matching the description of BILAL CURETON exited the 5241 Range Rover from the rear driver-side and entered the convenience store at the gas station. At approximately 1:29 a.m., after the individual who appeared to be BILAL CURETON returned to the 5241 Range Rover, the Co-conspirators drove the 5241 Range Rover and the 6606 Maserati out of the gas station, following each other. At approximately 2:20 a.m., the Co-conspirators drove the 5241 Range Rover and the 6606 Maserati by an automated license plate reader ("ALPR")<sup>2</sup>, apparently still following each other, in Nanuet, New York, which borders Spring Valley and New City.

29. During the early morning hours of on or about August 6, 2019, the Co-conspirators parked the 5241 Range Rover in the vicinity E. Church St. and Lawrence Street in Spring Valley, New York. Later that morning, at approximately 5:00 a.m., a 2006 Jeep Grand Cherokee (the "Jeep"), which is known by law enforcement to be used by MALIK BAKER, stopped in the vicinity of E. Church St. and Lawrence Street. An unknown Co-conspirator exited the Jeep, entered the 5241 Range Rover, and the Co-conspirators drove away in the 5241 Range Rover and the Jeep.

30. At approximately 5:12 a.m., the Co-conspirators drove the 5241 Range Rover and the Jeep by an ALPR, just two seconds apart, while traveling eastbound on Route 59 in New York. The Co-conspirators then drove the 5241 Range Rover across state lines into New Jersey. At approximately 11:03 a.m., on or about August 6, 2019, law enforcement recovered the 5241 Range Rover in Irvington, New Jersey, approximately one block away from 105 Ellis.

31. On or about August 6, 2019, at approximately 6:02 p.m., BAKER's Cell Phone was used to take a picture of the insurance card for the 5241 Range Rover, which was located inside the 5241 Range Rover at the time it was stolen.

#### Porsche Cayenne, stolen from New City, New York, on August 6, 2019

32. On or about August 6, 2019, at approximately 2:56 a.m., at an address in New City, New York, the Co-conspirators stole a 2019 white Porsche Cayenne, with last four digits of the true VIN assigned to that vehicle being 4675 (the "4675 Porsche Cayenne").

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<sup>2</sup> ALPRs are high-speed, computer-controlled camera systems that are typically mounted on street poles, streetlights, highway overpasses, mobile trailers, or attached to police squad cars. ALPRs automatically capture all license plate numbers that come into view, along with the location, date, and time. The data, which includes photographs of the vehicle and sometimes its driver and passengers, is then uploaded to a central server. Once a car is entered into the law enforcement database, ALPR alerts law enforcement every time the vehicle hits a nearby plate reader.

33. Home surveillance video shows what appears to be the 6606 Maserati stop in front of the residence where the 4675 Porsche Cayenne was parked. Two unknown Co-conspirators wearing dark hoods and gloves exited the 6606 Maserati and opened the doors of the three vehicles parked at the residence. One of the unknown Co-conspirators, wearing what appeared to be the same black hooded sweatshirt with white stripes on the sleeves previously observed on a Co-conspirator on two prior occasions, started the 4675 Porsche Cayenne, drove it across the front lawn of the residence, and drove away, following the Maserati.

34. On or about August 6, 2019, in the minutes following the theft of the 4675 Porsche Cayenne, SMITH's Cell Phone was used in the vicinity of the house where the 4675 Porsche Cayenne was parked.

35. At approximately 3:48 a.m., law enforcement in Clarkstown, New York observed the 6606 Maserati and attempted to conduct a vehicle stop. While law enforcement was attempting to conduct the stop, the Co-conspirators accelerated the 6606 Maserati and crashed it head-on into the law enforcement vehicle.

36. The Co-conspirators in the 6606 Maserati then exited the car and got into the 4675 Porsche Cayenne, which was nearby. The Co-conspirators fled in the 4675 Porsche Cayenne, at times, driving at speeds in excess of 120 miles per hour. The Co-conspirators eventually evaded law enforcement, fleeing northbound on the New York State Thruway, and drove the 4675 Porsche Cayenne across state lines into New Jersey.

37. Law enforcement recovered the abandoned 6606 Maserati and processed it for forensic evidence. Fingerprints lifted from the 6606 Maserati matched the fingerprints of HAKEEM SMITH. Additionally, law enforcement recovered DNA evidence from the 6606 Maserati. A search of a law enforcement database indicated a possible DNA association between a DNA sample recovered from the 6606 Maserati and the DNA of MALIK BAKER.

38. At approximately 2:57 a.m., on or about August 7, 2019, law enforcement observed the 4675 Porsche Cayenne parked behind 105 Ellis.

39. BAKER's Cell Phone and SMITH's Cell Phone were both being used in the vicinity of 105 Ellis between on or about August 6 and August 7, 2019. Additionally, on or about August 6, 2019, at approximately 9:58 p.m., BAKER's Cell Phone made a phone call to SMITH's Cell Phone.

40. On or about August 7, 2019, at approximately 11:30 a.m., the Internet browser on BAKER's Cell Phone was used to view a news article about the high-speed chase involving the 6606 Maserati and the 4675 Porsche

Cayenne in New City, New York, that the Co-conspirators were involved in on the day prior.

41. On or about August 7, 2019, at approximately 6:23 p.m., law enforcement observed a Co-conspirator wearing a black hoodie and gloves get into the 4675 Porsche Cayenne behind 105 Ellis and drive away. At approximately the same time, SMITH's Cell Phone was being used in the vicinity of 105 Ellis.

42. Later that evening, on or about August 7, 2019, law enforcement in Woodbridge, New Jersey, located and pursued the 4675 Porsche Cayenne. The Co-conspirators led law enforcement on high-speed chase for over 18 miles, reaching speeds of approximately 130 mph. Eventually, the Co-conspirators crashed the 4675 Porsche Cayenne at 140-144 Ellis Avenue, less than a block away from 105 Ellis, in Irvington, and fled on foot.

43. Law enforcement subsequently processed the 4675 Porsche Cayenne for forensic evidence, including collecting various items that contained DNA. A search of a law enforcement database indicated a possible DNA association between a DNA sample recovered from the 4675 Porsche Cayenne and the DNA of BILAL CURETON.

#### Maserati Levante, stolen from Hillsborough, New Jersey, on August 14, 2019

44. On or about July 14, 2019, in Mahwah Township, New Jersey, law enforcement stopped a 2017 Honda Accord (the "Honda"), which is registered to an individual known to law enforcement ("Individual-1"). NAFIQUE GOODWYN was driving the Honda. At the time of the stop, law enforcement observed HAKEEM SMITH hiding in the back seat of the Honda.

45. On or about August 14, 2019, at an address in Hillsborough, New Jersey, the Co-conspirators stole a 2017 Maserati Levante, with last four digits of the true VIN assigned to that vehicle being 6779 (the "6779 Maserati").

46. During the morning of the theft of the 6779 Maserati, residents nearby observed four unknown Co-conspirators sitting in the Honda, which was parked from approximately 6:40 a.m. until approximately 7:10 a.m., in the vicinity of where the Co-conspirators had stolen the 6779 Maserati.

47. Law enforcement contacted Individual-1, who informed law enforcement that she was not in Hillsborough on the morning of August 14, 2019, and that NAFIQUE GOODWYN had borrowed her car in order to fix the brakes. According to Individual-1, NAFIQUE GOODWYN was supposed to return the Honda to her that morning, but he never showed up.

Mercedes Benz Maybach, stolen from Quogue, New York, on August 29, 2019

48. On or about August 29, 2019, at an address in Quogue, New York, the Co-conspirators stole a 2019 Mercedes Benz Maybach, with last four digits of the true VIN assigned to that vehicle being 8290 (the “8290 Mercedes Maybach”).

49. SMITH’s Cell Phone was being used in the vicinity of 105 Ellis at approximately 5:00 a.m. on or about August 29, 2019.

50. At approximately 8:00 a.m., law enforcement observed the 8290 Mercedes Maybach behind 105 Ellis. Law enforcement observed a Co-conspirator exit the 8290 Mercedes Maybach and then appeared to use his cell phone to take pictures of the 8290 Mercedes Maybach. Law enforcement also observed a stolen 2014 black Lexus GS, with last four digits of the true VIN assigned to that vehicle being 1273 (the “1273 Lexus”), parked next to the 8290 Mercedes Maybach. The 1273 Lexus was reported stolen from a residence in Long Branch, New Jersey on or about August 29, 2019.

51. On or about September 10, 2019, law enforcement located and recovered the 8290 Mercedes Maybach at an address in Queens, New York.

Mercedes Benz AMG S63, stolen from Orangeburg, New York, on September 10, 2019

52. On or about September 10, 2019, in the early morning hours shortly after midnight, at an address on Dorsey Court in Orangeburg, New York, the Co-conspirators stole a 2017 silver Mercedes Benz AMG S63, with Florida registration, and with last four digits of the true VIN assigned to that vehicle being 2016 (the “2016 Mercedes AMG”).

53. At approximately 2:37 a.m., law enforcement in Clarkstown, New York observed the Honda, following closely behind what appeared to be the 2016 Mercedes AMG. Law enforcement conducted a stop of the Honda, which NAFIQUE GOODWYN was again driving, and the Mercedes sped away. Law enforcement arrested NAFIQUE GOODWYN on unrelated charges. During his arrest, NAFIQUE GOODWYN spontaneously uttered that his car wasn’t stolen, and that if it was, he wouldn’t have stopped.

54. Court-authorized location data from NAFIQUE GOODWYN’s cell phone (“GOODWYN’s Cell Phone”) indicates that GOODWYN’s Cell Phone was being used in the vicinity of the address on Dorsey Court from where the 2016 Mercedes AMG was stolen, in the early morning hours of on or about September 10, 2019 -- the same day the 2016 Mercedes AMG was stolen.

55. In the morning of on or about September 10, 2019, law

enforcement observed the 2016 Mercedes AMG parked behind 105 Ellis. At approximately 6:34 a.m., law enforcement observed an unknown Co-conspirator wearing a black hoodie and gloves exiting the 2016 Mercedes AMG.

56. On or about October 4, 2019, law enforcement observed the 2016 Mercedes AMG parked at an apartment complex in Carlisle, Pennsylvania. Law enforcement determined that the 2016 Mercedes now had a fictitious North Carolina temporary license plate, and that the Co-conspirators had altered the VIN to a new VIN with the last four digits being 8901.

57. On or about December 4, 2019, law enforcement recovered the 2016 Mercedes AMG in Carlisle, Pennsylvania.

58. As a result of the conspiracy, the Co-conspirators stole at least 13 vehicles with an estimated value of over \$1.5 million.