

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America

v.

PAUL ROGERS

Case No.

Mag. No. 21-mj-17059 (SAK)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 14, 2021 in the county of Camden in the
District of New Jersey, the defendant(s) violated:

Code Section

18 U.S.C. § 1951

Description of Offenses

See Attachment A.

This criminal complaint is based on these facts:

See Attachment B.

☒ Continued on the attached sheet.

Nathan Johnson

Complainant's signature

Nathan Johnson, Special Agent, ATF

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

telephone

(specify reliable electronic means).

Date:

9/17/21

Sharon A. King

Judge's signature

City and state:

Camden, New Jersey

Hon. Sharon A. King, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED
UNITED STATES ATTORNEY

By: /s/Jeffrey B. Bender
Jeffrey B. Bender, Assistant U.S. Attorney

Date: September 17, 2021

ATTACHMENT A

COUNT ONE

(Hobbs Act Robbery)

On or about September 14, 2021, in Camden County, in the District of New Jersey, and elsewhere, defendant

PAUL ROGERS

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951, and did commit and threaten physical violence to the person and property of another, namely an employee of a gas station located in Pennsauken, New Jersey, in furtherance thereof.

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

ATTACHMENT B

I, Nathan Johnson, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives. 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, photographs and video recordings of the 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 and time, I am asserting that it took place on or about the date and time alleged.

1. Video surveillance shows that on September 13, 2021, at approximately 10:48 p.m., a black male with a thicker build wearing a white shirt and grey sweatpants (believed to be PAUL ROGERS, or "ROGERS") and a black male with a thinner build wearing dark pants and a hooded sweatshirt (believed to be KAMAU BRADSHAW, or "BRADSHAW"), departed a residence on the 1000 block of Mechanic Street in Camden, New Jersey ("the Target Premises") and approached a silver Nissan Altima parked on the street nearby. ROGERS was carrying a long, duffel type bag from the Target Premises and placed the bag in the back seat of the Altima. Both men entered the Altima and drove away.

2. Video surveillance shows that on September 14, 2021, at approximately 1:49 a.m., a silver Nissan Altima turned onto Beacon Street from Highland Avenue, in Pennsauken, New Jersey (which is in close proximity to the gas station described below). The passenger exited the vehicle, followed by the driver exiting the vehicle. The passenger and driver matched the physical descriptions of the individuals depicted leaving the Target Premises several hours earlier.

3. Video surveillance shows that approximately 6 minutes later, on September 14, 2021, at approximately 1:55 a.m., a gas station in Pennsauken, New Jersey was robbed by two individuals. The first robber, believed to be ROGERS, was a heavier set black male wearing a grey hooded sweatshirt with a large white Nike logo on the chest, grey sweatpants with what appears to be a dark logo on the left thigh, tan work boots with scuffed toes, and a facemask. The second robber, believed to be BRADSHAW, was a thinner black male wearing a tan hooded sweatshirt with "REACTIVE" on the sleeves, dark pants, striped boxershorts, and a dark facemask. The second robber (BRADSHAW) was carrying an AR-style rifle with a sling. The robbers obtained money and cigarettes from a gas station employee by brandishing the AR-style rifle, putting the gas station employee in fear of physical violence, and brandishing the firearm once again while departing the gas station.

4. Video surveillance shows that minutes after the robbery, at approximately 1:58 a.m., the silver Nissan Altima that had been parked on Beacon Street in close proximity to the Pennsauken gas station performed a “K” turn and left the area via Highland Avenue. At approximately 2:35 a.m., an apparently identical Nissan Altima traveled northbound on S. 10th Street (near the Branch Village Apartments) in Camden, New Jersey. At approximately 2:38 a.m., the apparently identical Nissan Altima turned right on Liberty Street and then turned right on Mt. Ephraim Avenue in Camden, New Jersey. At approximately 2:39 a.m., an apparently identical Nissan Altima turned right onto Mechanic Street, Camden, New Jersey, pulled over to the right, and parked at the corner.

5. Video surveillance shows that on September 14, 2021, at approximately 2:41 a.m., a black male wearing a hooded sweatshirt and dark pants and holding a long duffel style bag in his left hand walked down Mechanic Street from the corner of Mt. Ephraim Avenue and Mechanic Street. The male walked up to the porch at the Target Premises. A few moments later, a second male walked down Mechanic Street to the Target Premises and opened the door, at which point both men entered the home.

6. On or about September 16, 2021, at approximately 2:40 a.m., a gas station in Haddon Township, New Jersey was robbed. Video surveillance footage shows that one robber stayed in a silver Nissan Altima. The second robber, a heavier set black male believed to be ROGERS, wearing what appears to be the same grey hooded sweatshirt with a large white Nike logo as worn by ROGERS during the prior robbery, exited the silver Nissan Altima, retrieved an AR-style rifle from the trunk, and ran to the gas station. The robber obtained several hundred dollars from the gas station employee while brandishing the AR-style rifle. The robber returned to the Nissan Altima, which departed the scene.

7. Video surveillance shows that approximately 27 minutes later, an apparently identical silver Nissan Altima returned to the Target Premises and a heavier set male in a Nike hooded sweatshirt (believed to be ROGERS) and a second thinner male (believed to be BRADSHAW) returned to the Target Premises with a large duffel bag.

8. On September 17, 2021, at approximately 6:00 a.m., law enforcement agents executed a federal search warrant at the Target Premises, authorized the prior day by the Honorable Sharon A. King. BRADSHAW and ROGERS were the only two adult males present during the search. While executing the warrant, agents seized, among other items, a duffel bag containing a non-serialized AR-style rifle with a sling consistent with the AR-style rifle used in the two robberies. In addition, agents seized a grey hooded sweatshirt with a large white Nike logo, grey sweatpants with a logo on the left thigh, and tan work boots with scuffed toes, consistent with the clothing worn by the heavier set robber during the September 14th robbery. Agents also seized a tan hooded

sweatshirt with "REACTIVE" on the sleeves consistent with the clothing worn by the thinner robber during the September 14th robbery. During the execution of the search warrant, BRADSHAW was wearing striped boxersshorts consistent with those worn by the thinner robber during the September 14th robbery.


9. Based on my training, experience, and knowledge of the investigation, the Pennsauken gas station described herein purchased, sold and/or repurposed goods manufactured outside the state of New Jersey, and therefore engaged in interstate commerce.

Respectfully submitted,



Nathan Johnson
ATF Special Agent

Pursuant to Fed. R. Crim. P. 4.1, ATF Special Agent Johnson was sworn and attested to the contents of this affidavit in support of the criminal complaint.


HON. SHARON A. KING
United States Magistrate Judge

Date: September 17, 2021