

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

7:25-mj-924

UNITED STATES OF AMERICA

v.

KEVIN WILLIAMS, and
BYRON WILSON,

Defendants.

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 1951 and 2.

COUNTY OF OFFENSE:
WESTCHESTER

SOUTHERN DISTRICT OF NEW YORK, ss.:

DANIEL O'MALLEY, being duly sworn, deposes and says that he is a Task Force Officer with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE
(Conspiracy to Commit Hobbs Act Robbery)

1. On or about December 16, 2024, in the Southern District of New York and elsewhere, KEVIN WILLIAMS and BYRON WILSON, the defendants, and others known and unknown, knowingly combined, conspired, confederated, and agreed together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, WILLIAMS and WILSON conspired with others to rob a jewelry store in Hartsdale, New York.

(Title 18, United States Code, Section 1951.)

COUNT TWO
(Hobbs Act Robbery)

2. On or about December 16, 2024, in the Southern District of New York, KEVIN WILLIAMS and BYRON WILSON, the defendants, and others known and unknown, knowingly committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, WILLIAMS and WILSON committed, and aided and abetted the commission of, a robbery of a jewelry store in Hartsdale, New York.

(Title 18, United States Code, Sections 1951 and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

3. I have been a Task Force Officer with the FBI since January 2018. I am employed as a detective with the Town of Greenburgh Police Department. I have worked in law enforcement for over fifteen years. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement agents, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part.

4. Since August 2024, the Nassau County Police Department (“NCPD”) has been investigating a series of jewelry store robberies. As part of its investigation, law enforcement identified GPS location information showing that phones associated with call numbers ending in -0131 (the “WILLIAMS Phone”) and -9100 (the “WILSON Phone,” and, collectively with the WILLIAMS Phone, the “WILLIAMS and WILSON Phones”) were in the area of several of these robberies. As discussed below in paragraphs 11(m) and (n), KEVIN WILLIAMS and BYRON WILSON, the defendants, are believed to be the users of the WILLIAMS and WILSON Phones, respectively. Location information for the WILLIAMS and WILSON Phones also associated these phones with a multi-family residence in Irvington, New Jersey (the “WILLIAMS and WILSON Residence”). According to law enforcement records, KEVIN WILLIAMS and BYRON WILSON, the defendants, both reside at the WILLIAMS and WILSON Residence.

The December 16, 2024, Jewelry Store Robbery

5. On or about December 16, 2024, at around 11:07 a.m., four masked individuals dressed in all black sledgehammered their way into a jewelry store (“Jewelry Store-1”) at the Westchester Square shopping plaza, located in Hartsdale, New York. Based on my review of surveillance footage, I understand that one individual (“Robber-1”) was wearing a black hooded sweatshirt, pants, a mask, orange gloves, and dark shoes; another individual (“Robber-2”) was wearing a black hooded sweatshirt, pants, and shoes with a baseball hat under the sweatshirt; a third individual (“Robber-3”) was wearing a black hooded sweatshirt, pants, and white sneakers; and a fourth individual (“Robber-4,” and, collectively with Robber-1, Robber-2, and Robber-3, the “Robbers”) was wearing a black hooded sweatshirt, pants, sneakers with white soles, and white socks.

6. Based on my review of surveillance footage from in front of Jewelry Store-1, I understand that the Robbers drove up to the store in a dark blue Jeep Grand Cherokee with New Jersey registration G77NXW (the “Blue Jeep”) that was reported stolen. Surveillance images of the Robbers exiting the Blue Jeep and then breaking into Jewelry Store-1 are below.

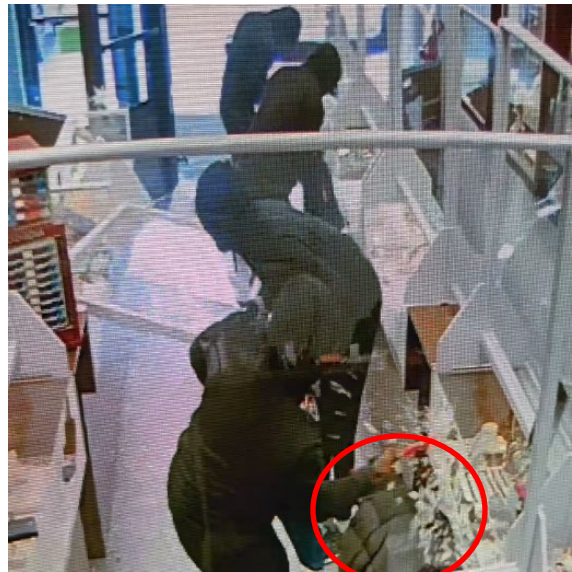


The Blue Jeep in Front of Jewelry Store-1, as the Robbers Exit the Jeep and Sledgehammer the Front of the Store



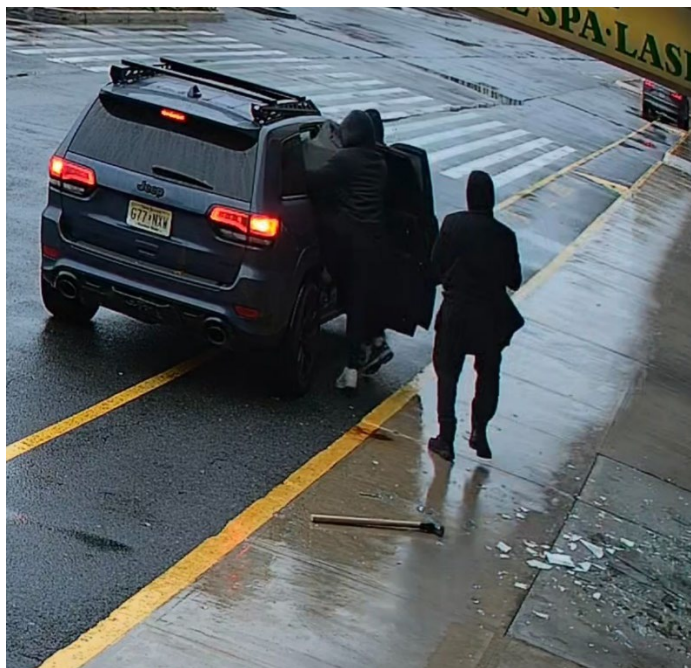
Glass from Jewelry Store-1's Window Shattered on the Ground by the Robbers, Right Before They Enter the Store

7. Surveillance footage images from inside Jewelry Store-1 are below. In the image on the left, one of the Robbers can be seen wielding a hammer to break the glass of a display case, while the three other Robbers make their way through the broken store window. In the image on the right, one of the Robbers can be seen breaking the glass of a display case while an innocent bystander (circled in red) cowers on the floor underneath him to protect herself.



8. Based on my review of surveillance footage, as well as law enforcement reports and interviews with witnesses and victims, I understand that the Robbers stole approximately \$1,700,000 in jewelry, which they filled into bags that they brought with them to the robbery. The stolen items included, among other things, high-end watches—including watches manufactured outside of the United States—as well as diamonds in various forms, such as rings, necklaces, and earrings. For example, the Robbers stole, among other things, seventy (70) Rolex watches worth more than \$1 million total.

9. After the robbery, the Robbers brought the bags of stolen jewelry back to the Blue Jeep and fled the scene. Surveillance images are below.



10. Based on my review of license plate reader (“LPR”) information, I understand that the Blue Jeep crossed the Governor Mario Cuomo Bridge (f/k/a the Tappan Zee Bridge), towards New Jersey. Images of the Blue Jeep crossing the bridge are below:



11:12 a.m.
*Fleeing the Robbery Location
on Central Avenue in Hartsdale*



11:19 a.m.
*Driving on Route 119 in
White Plains, NY*



11:25 a.m.
*Crossing the Governor
Mario M. Cuomo Bridge*

Subsequent Investigation

11. During its subsequent investigation of the robbery of Jewelry Store-1, law enforcement, among other things, interviewed witnesses, obtained GPS location information, and executed search warrants. Based on my involvement in this investigation, my review of documents and other evidence, and my conversations with other law enforcement officers, I have learned that, on or about December 16, 2024, the following occurred, in substance and in part:

a. Based on my review of law enforcement databases and conversations with witnesses, I understand that the G77NXW license plate (*i.e.*, the license plate attached to the Blue Jeep) was stolen from a red Jeep Grand Cherokee earlier in the morning on December 16, 2024. Based on my review of location information and law enforcement conversations with the registered owner of the red Jeep Gran Cherokee, I understand that, between around 8:00 a.m. and 9:00 a.m. on the morning of December 16, 2024 (*i.e.*, approximately two to three hours before the robbery), the WILLIAMS and WILSON Phones were located within a few blocks of from the car that the G77NXW license plate is believed to have been stolen from. Based on my training and experience, I know that it is common for criminals to steal license plates of similar make and model vehicles for use in committing crimes, because doing so might reduce the likelihood that the car is stopped if law enforcement runs the license plate.

b. As reflected in surveillance footage, at around 9:22 a.m., three individuals exited the WILLIAMS and WILSON Residence dressed in all-black attire. The three individuals are circled in red, below. Cell phone location information for the WILLIAMS and WILSON Phones lines up with the movement of these individuals around this time:



c. In particular, cell phone location information for the WILLIAMS and WILSON Phones shows the phones travelling from the area of the WILLIAMS and WILSON Residence in Irvington, New Jersey, to Jewelry Store-1; remaining in the vicinity of Jewelry Store-1 at around the time of the robbery; and then travelling back to New Jersey at locations and times consistent with LPR hits for the Blue Jeep. Cell phone location information later shows the WILLIAMS and WILSON Phones traveling back towards the WILLIAMS and WILSON Residence, and then towards Manhattan, New York.

d. At around 1:00 p.m., cell phone location information shows that the WILLIAMS Phone was located in the vicinity of West 47th Street and 6th Avenue. This area is

widely known as New York City’s “Diamond District,” described as “[t]he world’s premier shopping destination for diamonds and fine jewelry.” Diamond District Partnership, *The Diamond District* (last accessed Mar. 14, 2025), <https://diamondddistrict.org/>.

e. Meanwhile, based on my review of surveillance footage, I understand that, at around 1:07 p.m., an individual dressed in dark hooded sweatshirt and dark pants, who I believe to be BYRON WILSON, the defendant, walked through an alleyway and then entered the WILLIAMS and WILSON Residence. I believe this individual to be WILSON because he is wearing similar clothes to what WILSON was wearing later that day (see below paragraph 11(i), below), and surveillance footage showing the movement of this individual lines up with cell phone location information for the WILSON Phone. WILSON’s path through the alleyway and then into the residence is marked with arrows in the below image.



f. Meanwhile, at around 1:15 p.m., based on a review of the WILSON Phone, which was subsequently obtained by law enforcement (*see* paragraph 11(n), below), WILSON conducted a Google search of the phrase “tudor geneve watch” while he was at the WILLIAMS and WILSON Residence. Based on my review of an inventory of items stolen from Jewelry Store-1, the Robbers stole several Tudor watches (and “Genève” is the French word for the city of Geneva, Switzerland, where Tudor watches are made).

g. At around 3:25 p.m., cell phone location information shows that the WILLIAMS Phone left the Diamond District and then headed back towards New Jersey.

h. At around 4:45 p.m., cell phone location information shows that the WILSON Phone arrived in the area of an address in Newark, New Jersey (the “Newark Residence”). Around that same time, cell phone location information shows that the WILLIAMS

Phone was about a quarter of a mile from the Newark Residence and heading towards its location before cell phone location information stopped for his phone.¹

i. At around 4:56 p.m., based on a review of the WILSON Phone, the WILSON Phone captured several photographs of WILSON, KEVIN WILLIAMS, the defendant, and another co-conspirator, in which they displayed large amounts of cash. Cell phone location information for the WILLIAMS and WILSON Phones shows the phones' locations lining up with the location metadata for these photographs, indicating that WILLIAMS, WILSON, and their phones, were at the Newark Residence. In the images below, which were captured on the WILSON Phone, WILLIAMS (wearing a black hooded sweatshirt and gray pants) and WILSON (wearing a dark navy hooded sweatshirt with the letters "RAW" on the front and light blue jeans) can be seen displaying large stacks of cash:



4:56:24 p.m.



4:56:38 p.m.



4:57:22 p.m.

j. At around 5:25 p.m., cell phone location information shows the WILSON Phone left the Newark Address. Although no location information for the WILLIAMS Phone was recorded at this time, at around 5:46 p.m., location information subsequently resumed on the WILLIAMS Phone, showing that the WILLIAMS and WILSON Phones were together at around the same location. Cell phone location information for the WILLIAMS and WILSON Phones then shows them traveling to various places together in the following hours.

k. At around 7:40 p.m., based on a review of the WILSON Phone, WILSON conducted a search in a Safari browser of the phrase "hartsdale news." As noted above, the robbery occurred in Hartsdale, New York. Around the same time, WILSON used his phone to view news articles about the robbery, including the News 12 Hudson Valley article titled "Tarrytown Jewelers in Hartsdale victim of robbery in broad daylight," at the URL <https://hudsonvalley.news12.com/tarrytown-jewelers-in-hartsdale-victim-of-robbery-in-broad->

¹ From around 4:43 p.m. to around 5:47 p.m., no cell phone location information was recorded for the WILLIAMS Phone.

daylight. Based on my training and experience, it is common for criminals to search for news articles covering crimes they have engaged in.

l. At around 9:55 p.m., cell phone location information for the WILLIAMS and WILSON Phones shows that they arrived back at the WILLIAMS and WILSON Residence.

m. On or about December 16 and 17, 2024, following the Jewelry Store-1 Robbery, law enforcement conducted surveillance at the WILLIAMS and WILSON Residence on at least three occasions. Both WILLIAMS and WILSON were seen leaving and entering the residence, while cellphone location information for the WILLIAMS and WILSON Phones tracked their movements to and from the residence; that is, when WILLIAMS and/or WILSON were observed by law enforcement arriving or leaving the WILLIAMS and WILSON Residence, the cell phone location information for the phones would line up with their arrival or departure times.


n. On or about December 19, 2024, law enforcement searched the WILLIAMS and WILSON Residence. During the search, law enforcement found WILSON in possession of the WILSON Phone. Law enforcement also found WILLIAMS in possession of a phone (the "New WILLIAMS Phone"). Based on my review of cell phone data for the WILLIAMS Phone, I understand that the WILLIAMS phone stopped recording location information on or about December 18, 2024, and thus appears to have been disconnected. Based on my review of the New WILLIAMS Phone, I understand that the New Williams Phone received cell phone plan initiation text messages on or about that same day, indicating that the new phone had just been activated. Photographs on the New WILLIAMS Phone, which were taken minutes after these text messages were received, show images of the stored contacts of another phone, including contact information for the WILSON Phone. One of those photographs also showed the Apple ID information for the phone being photographed. Based on my review of subscriber information obtained from Apple Inc., that Apple ID is associated with the WILLIAMS Phone.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of KEVIN WILLIAMS and BYRON WILSON, the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.

/s/ Daniel O'Malley (signed by VR with permission)

Daniel O'Malley
Task Force Officer
Federal Bureau of Investigation

Sworn to me through the transmission of
this Complaint by reliable electronic means,
under Federal Rules of Criminal Procedure
41(d)(3) and 4.1, this 20th day of March, 2025.


THE HONORABLE VICTORIA REZNIK
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK