

Approved: Dominic A. Gentile
Dominic A. Gentile
Assistant United States Attorney

Before: HONORABLE BARABARA C. MOSES
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA, : COMPLAINT
: :
- v. - : Violations of 18 U.S.C.
: § 1951
: :
STANLEY ROGERS, : COUNTY OF OFFENSE:
: NEW YORK
Defendant. :
: :
-----X

SOUTHERN DISTRICT OF NEW YORK, ss.:

CHRISTIAN ANDRETTA, being duly sworn, deposes and says that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations, and charges as follows:

COUNT ONE
(Conspiracy to Commit Hobbs Act Robbery)

1. From between in or about March 12, 2018, and in or about March 26, 2018, in the Southern District of New York, and elsewhere, STANLEY ROGERS, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree 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, ROGERS and others, known and unknown, conspired to rob a commercial establishment in New York, New York.

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

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

2. I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations assigned to the Border Enforcement Security Task Force ("BEST") that is comprised of members of the New York City Police Department ("NYPD"), and the Department of Homeland Security ("DHS"), and have been so employed for approximately 12 years.

3. I have been personally involved in the investigation of the above-described offenses. I am familiar with the facts and circumstances set forth below based on my review of pertinent documents, and from my conversations with fellow law enforcement officers, and other witnesses. 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 this 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, except where otherwise indicated.

Overview

4. As described in greater detail below, based on my investigation into this matter, my conversations with other law enforcement officers, and my review of reports prepared by other law enforcement agents, including recorded conversations between an undercover police detective and STANLEY ROGERS, the defendant, I have learned, among other things, that in or about March 2017, STANLEY ROGERS, the defendant, conspired with others to rob a Federal Express truck containing diamonds and other precious stones the belonged to wholesale jewelry establishments located in New York, New York.

The Investigation

The Initial Phone Call

5. Based on my participation in this investigation, my conversations with other law enforcement officers, and my review of reports prepared by other law enforcement agents, including recorded conversations between an undercover police detective and STANLEY ROGERS, the defendant, I have learned, among other things, the following:

a. On or about March 12, 2018, ROGERS spoke with an undercover NYPD detective (the "UC") over the telephone. ROGERS asked the UC if the UC was able to provide ROGERS with a high powered Taser or veterinary tranquilizers that ROGERS planned to use during the commission of a robbery to incapacitate the victims of the robbery.

The First Meeting

6. Based on my participation in this investigation, my conversations with other law enforcement officers, and my review of reports prepared by other law enforcement agents, including recorded conversations between the UC and STANLEY ROGERS, the defendant, I have learned, among other things, the following:

a. On or about March 14, 2018, ROGERS met with the UC in the vicinity of Linden Boulevard, Brooklyn, New York. During the meeting, ROGERS informed the UC that he and others were planning to rob a Federal Express delivery truck (the "Truck") containing diamonds and other precious stones that were intended for delivery to, or transport from, various commercial establishments located at a particular address on Fifth Avenue, New York, New York (the "Fifth Avenue Address").

b. ROGERS sought to enlist the assistance of the UC in procuring items ROGERS deemed necessary for the completion of the robbery. ROGERS explained that he was working with others, including a Federal Express employee, to rob the Truck of its contents by administering possibly lethal doses of a sedative to the individuals guarding the Truck and its contents. ROGERS and the UC discussed the various ways in which the tranquilizer could be administered, including through the use of tranquilizer darts.

c. ROGERS further explained that his plan was to immobilize the personnel guarding the Truck and to kidnap them and steal the Truck's contents, which ROGERS claimed would contain precious stones valued at approximately three million dollars. ROGERS agreed to purchase \$500 worth of veterinary sedative from the UC for use in the robbery.

d. ROGERS enlisted the UC as a participant in the robbery and showed the UC images of what he purported were surveillance photos of the Truck and its guards which were contained in a cellphone ROGERS had in his possession.

e. On or about March 16, 2018, ROGERS met with the UC on the corner of Atlantic Avenue and Ralph Avenue, Brooklyn

New York. During the meeting, ROGERS gave the UC a \$200 down payment for the veterinary tranquilizer that ROGERS intended to use in the robbery.

f. ROGERS provided the UC with certain details about the intended robbery, including, among other things, the following:

- i. The route the Truck followed, and certain of its stops.
- ii. An employee of the firm providing security for the Truck was ROGERS's source of information about the Truck and its contents.
- iii. ROGERS was incarcerated for 22 years for shooting a New Jersey State Trooper.
- iv. ROGERS recruited at least two other individuals besides himself and the UC to participate in the planned robbery.
- v. At least one of the guards would be immobilized through the use of the veterinary tranquilizer and placed inside the Truck.
- vi. After the guards were immobilized, ROGERS and the UC would jump into the Truck. The Truck would be driven to a predetermined location, and another co-conspirator would follow the Truck in a separate vehicle.
- vii. ROGERS and the UC agreed to meet the following week to conduct surveillance of the Truck and the area where the robbery was to take place.

The Surveillance

7. Based on my participation in this investigation, my conversations with other law enforcement officers, and my review of reports prepared by other law enforcement agents, including recorded conversations between the UC and STANLEY ROGERS, the defendant, I have learned, among other things, the following:

a. On or about March 20, 2018, ROGERS met with the UC on the corner of Tenth Avenue and West 48th Street, New York, New York. ROGERS provided the UC with additional details about

the intended robbery, including, among other things, the following:

- i. ROGERS and the UC drove, in ROGERS's vehicle, to the vicinity of West 49th Street and Eleventh Avenue where Federal Express maintains a facility. ROGERS informed the UC that he was being provided information by a friend, who worked for Federal Express, about specific Federal Express vehicles that carried precious stones.
- ii. According to ROGERS's source, the Truck bore a particular three letter identifying insignia.
- iii. ROGERS and the UC drove to the area of the Fifth Avenue Address which ROGERS identified as the source of the precious stones and the location where the Truck would make one of its scheduled stops.
- iv. The upper floors of the Fifth Avenue Address were occupied by wholesale jewelers who kept large amounts of precious stones inside of their respective establishments.
- v. ROGERS had previously sold several Rolex watches, which he stole during previous robberies, to dealers inside of the Fifth Avenue Address.
- vi. ROGERS identified the exact spot where the precious stones would be loaded onto the Truck, and the route the Truck would take after receiving the precious stones from the Fifth Avenue Address.
- vii. When the precious stones were loaded into the Truck from the Fifth Avenue Address, the driver of the Truck usually stood outside the back facing the Truck's rear compartment.
- viii. Once the UC administered the tranquilizer to the driver, ROGERS would assist the UC in placing the driver into the back of the Truck.
- ix. Another co-conspirator was assigned to drive a back-up vehicle that would follow ROGERS and the

UC in the Truck to a pre-determined location in Brooklyn, New York.

- x. ROGERS insisted on being the only member of the robbery team who would be armed, and that he would be carrying a 9MM pistol.
- xi. ROGERS paid the UC the remaining \$300 for the veterinary tranquilizer he planned to use during the robbery.

The March 26, 2018 Meeting

8. Based on my participation in this investigation, my conversations with other law enforcement officers, and my review of reports prepared by other law enforcement agents, including recorded conversations between the UC and STANLEY ROGERS, the defendant, I have learned, among other things, the following:

- i. On or about March 26, 2018, ROGERS met with the UC in the vicinity of Linden Boulevard, Brooklyn, New York. During the meeting, ROGERS confided in the UC that ROGERS suspected a member of his crew was a "rat."
- ii. ROGERS explained that he refused to go back to prison, and wanted to "get rid" of the suspected informant.
- iii. ROGERS asked the UC for a lethal dose of narcotics to give to the suspected informant.

WHEREFORE, the deponent requests that STANLEY ROGERS, the defendant, be imprisoned, or bailed, as the case may be.

CHRISTIAN ANDRETTA
Special Agent
Department of Homeland Security

Sworn to before me this
26th day of March 2018

HONORABLE BARBARA C. MOSES
United States Magistrate Judge
Southern District of New York