

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Joel A. Pisano
:
v. :
: Crim. No. 13-349 (JAP)
CARL WILLIAMS, :
a/k/a "Andrew," :
a/k/a "Drew," : 18 U.S.C. § 1951(a)
KAJUAN CRAWLEY, : 18 U.S.C. § 924(c)(1)(A)(ii)
a/k/a "Boobie," : 18 U.S.C. § 2
ERIC WILLIAMS, :
a/k/a "Long Boy," and :
UNIQUE RANDOLPH :

S U P E R S E D I N G I N D I C T M E N T

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges:

COUNT ONE
(Hobbs Act Conspiracy)

1. From at least in or about May 2012 through on or
about January 16, 2013, in Bergen, Middlesex, and Union
Counties, in the District of New Jersey, and elsewhere,
defendants,

CARL WILLIAMS,
a/k/a "Andrew,"
a/k/a "Drew,"
KAJUAN CRAWLEY,
a/k/a "Boobie,"
ERIC WILLIAMS,
a/k/a "Long Boy," and
UNIQUE RANDOLPH

did knowingly and willfully conspire and agree with each other
and others to obstruct, delay, and affect commerce and the

movement of articles and commodities in commerce by robbery, and to commit and threaten physical violence to persons and property in furtherance of a plan and purpose to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery.

MANNER AND MEANS OF THE CONSPIRACY

2. It was a part of the conspiracy that defendants CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew," KAJUAN CRAWLEY, a/k/a "Boobie," ERIC WILLIAMS, a/k/a "Long Boy," UNIQUE RANDOLPH, and others agreed to rob electronics stores at gunpoint, including the following stores on or about the following dates:

Date	Store	Location
May 30, 2012	Radio Shack Store	New Rochelle, New York
June 11, 2012	T-Mobile Store	Hempstead, New York
June 18, 2012	Radio Shack Store	Westbury, New York
June 20, 2012	T-Mobile Store	West Hempstead, New York
June 21, 2012	Radio Shack Store	Rockville Center, New York
September 20, 2012	T-Mobile Store	Linden, New Jersey
October 2, 2012	T-Mobile Store	Woodbridge, New Jersey
January 16, 2013	T-Mobile Store	Paramus, New Jersey

3. It was further part of the conspiracy that members of the conspiracy would use firearms to forcibly steal merchandise from employees of the electronics stores.

4. It was further part of the conspiracy that members of the conspiracy would tie-up employees of the electronics stores during the commission of the armed robberies.

5. It was further part of the conspiracy that members of the conspiracy would serve as lookouts outside the store and as getaway drivers during the commission of the armed robberies.

6. It was further part of the conspiracy that, after the armed robberies, members of the conspiracy would arrange for the sale of the stolen merchandise and share in the resulting profits.

OVERT ACTS

7. In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the District of New Jersey, and elsewhere:

a. On or about May 30, 2012, defendant CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew," and a conspirator entered and robbed a Radio Shack Store, located at Palmer Avenue, New Rochelle, New York (the "New Rochelle Radio Shack robbery"), and, during the course of the robbery, defendant CARL

WILLIAMS, a/k/a "Andrew," a/k/a "Drew," possessed and brandished a firearm.

b. On or about May 30, 2012, defendant KAJUAN CRAWLEY, a/k/a "Boobie," and other conspirators served as lookouts outside the Radio Shack Store during the commission of the New Rochelle Radio Shack robbery.

c. On or about June 11, 2012, defendant CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew," a co-conspirator (hereinafter, "C.C.1"), and another conspirator, who possessed and brandished a firearm, entered and robbed at gunpoint a T-Mobile Store, located at Peninsula Boulevard, Hempstead, New York (the "Hempstead T-Mobile robbery").

d. On or about June 11, 2012, defendant CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew," tied-up employees of the T-Mobile Store during the commission of the Hempstead T-Mobile robbery.

e. On or about June 11, 2012, defendant KAJUAN CRAWLEY, a/k/a "Boobie," and other conspirators served as lookouts outside the T-Mobile Store during the commission of the Hempstead T-Mobile robbery.

f. On or about June 18, 2012, defendant CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew," and C.C.1 entered and robbed at gunpoint a Radio Shack Store, located at Old Country Road, Westbury, New York (the "Westbury Radio Shack robbery").

g. On or about June 18, 2012, defendant CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew," tied-up employees of the Radio Shack Store, C.C.1 possessed and brandished a firearm, and defendant KAJUAN CRAWLEY, a/k/a "Boobie," served as a lookout outside the Radio Shack Store during the commission of the Westbury Radio Shack robbery.

h. On or about June 18, 2012, prior to the robbery, defendant KAJUAN CRAWLEY, a/k/a "Boobie," provided C.C.1 with the firearm that C.C.1 possessed and brandished during the Westbury Radio Shack robbery.

i. On or about June 20, 2012, defendant CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew," and C.C.1, who possessed a firearm, attempted to enter and rob at gunpoint a T-Mobile Store, located at Hempstead Turnpike, West Hempstead, New York, but were prevented from entering the store when an employee locked the door (the "West Hempstead T-Mobile attempted robbery").

j. On or about June 20, 2012, defendant KAJUAN CRAWLEY, a/k/a "Boobie," and other conspirators served as lookouts during the West Hempstead T-Mobile attempted robbery.

k. On or about June 20, 2012, prior to the attempted robbery, defendant KAJUAN CRAWLEY, a/k/a "Boobie," provided C.C.1 with the firearm that C.C.1 possessed during the West Hempstead T-Mobile attempted robbery.

l. On or about June 21, 2012, defendant CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew," and C.C.1, who possessed and brandished a firearm, entered and robbed at gunpoint a Radio Shack Store, located at Sunrise Highway, Rockville Center, New York (the "Rockville Center Radio Shack robbery").

m. On or about June 21, 2012, defendant KAJUAN CRAWLEY, a/k/a "Boobie," and other conspirators served as lookouts during the Rockville Center Radio Shack robbery.

n. On or about June 21, 2012, prior to the robbery, defendant KAJUAN CRAWLEY, a/k/a "Boobie," provided C.C.1 with the firearm that C.C.1 possessed and brandished during the Rockville Center Radio Shack robbery.

o. On or about September 20, 2012, defendant CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew," and C.C.1, who possessed and brandished a firearm, entered and robbed at gunpoint a T-Mobile Store, located at West Edgar Road, Linden, New Jersey (the "Linden T-Mobile robbery").

p. On or about September 20, 2012, defendants ERIC WILLIAMS, a/k/a "Long Boy," and KAJUAN CRAWLEY, a/k/a "Boobie," served as lookouts outside the T-Mobile Store during the commission of the Linden T-Mobile robbery.

q. On or about September 20, 2012, defendants CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew," ERIC WILLIAMS, a/k/a "Long Boy," KAJUAN CRAWLEY, a/k/a "Boobie," C.C.1, and

others travelled to Brooklyn, New York, where the stolen merchandise was sold.

r. On or about October 2, 2012, C.C.1, who possessed and brandished a firearm, and another conspirator entered and robbed at gunpoint a T-Mobile Store, located at 744 U.S. Highway 1 North, Woodbridge, New Jersey (the "Woodbridge T-Mobile robbery").

s. On or about October 2, 2012, defendant ERIC WILLIAMS, a/k/a "Long Boy," and others served as lookouts outside the T-Mobile Store during the commission of the Woodbridge T-Mobile robbery.

t. On or about October 2, 2012, defendant ERIC WILLIAMS, a/k/a "Long Boy," C.C.1, and others traveled to Brooklyn, New York, where the stolen merchandise was sold.

u. On or about January 16, 2013, defendant UNIQUE RANDOLPH and a conspirator, who possessed and brandished a firearm, entered and robbed at gunpoint a T-Mobile Store, located at Route 17 North, Paramus, New Jersey (the "Paramus T-Mobile robbery").

v. On or about January 16, 2013, defendant UNIQUE RANDOLPH tied-up the T-Mobile Store employees and other individuals during the commission of the Paramus T-Mobile robbery.

w. On or about January 16, 2013, defendant CARL WILLIAMS, a/k/a "Andrew," a/k/a "Drew," served as a lookout outside the T-Mobile Store during the commission of the Paramus T-Mobile robbery.

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

COUNT TWO
(Hobbs Act Robbery)

1. At all times relevant to this Superseding Indictment, T-Mobile was a mobile communications company that owned and operated a retail store located at West Edgar Road, Linden, New Jersey, that engaged in the sale of cellular telephones and other merchandise that moved in and affected interstate commerce, and that engaged in an industry that affects interstate commerce.

2. On or about September 20, 2012, in Union County, in the District of New Jersey, and elsewhere, defendants,

CARL WILLIAMS,
a/k/a "Andrew,"
a/k/a "Drew,"
KAJUAN CRAWLEY,
a/k/a "Boobie," and
ERIC WILLIAMS,
a/k/a "Long Boy,"

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, in that the defendants did unlawfully take and obtain personal property consisting of cellular telephones from the persons of and in the presence of employees of the T-Mobile Store in Linden, New Jersey, against their will by means

of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their custody.

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

COUNT THREE

(Use of a Firearm During a Crime of Violence)

On or about September 20, 2012, in Union County, in the District of New Jersey, and elsewhere, defendants,

CARL WILLIAMS,
a/k/a "Andrew,"
a/k/a "Drew,"
KAJUAN CRAWLEY,
a/k/a "Boobie," and
ERIC WILLIAMS,
a/k/a "Long Boy,"

during and in relation to a crime of violence for which defendants may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Two of this Superseding Indictment, did knowingly use and carry a firearm, which was brandished, and did aid and abet the same.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii) and Section 2.

COUNT FOUR
(Hobbs Act Robbery)

1. At all times relevant to this Superseding Indictment, T-Mobile was a mobile communications company that owned and operated a retail store located at U.S. Highway 1 North, Woodbridge, New Jersey, that engaged in the sale of cellular telephones and other merchandise that moved in and affected interstate commerce, and that engaged in an industry that affects interstate commerce.

2. On or about October 2, 2012, in Middlesex County, in the District of New Jersey, and elsewhere, defendant

ERIC WILLIAMS,
a/k/a "Long Boy,"

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, in that the defendant did unlawfully take and obtain personal property consisting of cellular telephones from the persons of and in the presence of employees of the T-Mobile Store in Woodbridge, New Jersey, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their custody.

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

COUNT FIVE
(Use of a Firearm During a Crime of Violence)

On or about October 2, 2012, in Middlesex County, in
the District of New Jersey, and elsewhere, defendant,

ERIC WILLIAMS
a/k/a "Long Boy,"

during and in relation to a crime of violence for which the
defendant may be prosecuted in a court of the United States,
namely, the Hobbs Act robbery charged in Count Four of this
Superseding Indictment, did knowingly use and carry a firearm,
which was brandished, and did aid and abet the same.

In violation of Title 18, United States Code, Section
924(c)(1)(A)(ii) and Section 2.

COUNT SIX
(Hobbs Act Robbery)

1. At all times relevant to this Superseding Indictment, T-Mobile was a mobile communications company that owned and operated a retail store located at Route 17 North, Paramus, New Jersey, that engaged in the sale of cellular telephones and other merchandise that moved in and affected interstate commerce, and that engaged in an industry that affects interstate commerce.

2. On or about January 16, 2013, in Bergen County, in the District of New Jersey, and elsewhere, defendants,

CARL WILLIAMS,
a/k/a "Andrew,"
a/k/a "Drew," and
UNIQUE RANDOLPH

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, in that the defendants did unlawfully take and obtain personal property consisting of cellular telephones from the persons of and in the presence of employees of the T-Mobile Store in Paramus, New Jersey, against their will by means of actual and threatened force, violence, and fear of injury,

immediate and future, to their persons and property in their custody.

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

COUNT SEVEN
(Use of a Firearm During a Crime of Violence)

On or about January 16, 2013, in Bergen County, in the
District of New Jersey and elsewhere, defendants,

CARL WILLIAMS,
a/k/a "Andrew,"
a/k/a "Drew," and
UNIQUE RANDOLPH

during and in relation to a crime of violence for which
defendants may be prosecuted in a court of the United States,
namely, the Hobbs Act robbery charged in Count Six of this
Superseding Indictment, did knowingly use and carry a firearm,
which was brandished, and did aid and abet the same.

In violation of Title 18, United States Code, Section
924(c) (1) (A) (ii) and Section 2.

A TRUE BILL

Foreperson



PAUL J. FISHMAN
United States Attorney

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

CARL WILLIAMS,
a/k/a "Andrew,"
a/k/a "Drew,"
KAJUAN CRAWLEY,
a/k/a "Boobie,"
ERIC WILLIAMS,
a/k/a "Long Boy," and
UNIQUE RANDOLPH

SUPERSEDING INDICTMENT FOR
18 U.S.C. § 1951(a)
18 U.S.C. § 924(c)(1)(A)(ii)
18 U.S.C. § 2

A True Bill,

Foreperson

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