UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA Hon. Leda D. Wettre

v. Mag. No. 24-13159

TROY D. CORBETT, JR., DYSHAWN WILLIAMS, KARIEEM

STAMPS, and ANTWUAN

AMENDED CRIMINAL COMPLAINT

KENNETH BROWN

I, Troy A. Pittenger, 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 Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof:

/s/ Troy Pittenger (EJ)

Troy A. Pittenger Postal Inspector

U.S. Postal Inspection Service

Postal Inspector Pittenger attested to this Complaint via telephone pursuant to F.R.C.P. 4.1 on this 1st day of August, 2024, in the District of New Jersey.

/s/ Hon. Leda D. Wettre (EJ)

Honorable Leda D. Wettre United States Magistrate Judge

ATTACHMENT A

COUNT ONE

(Conspiracy to Commit Hobbs Act Robbery)

On or about November 3, 2023, in Essex County, in the District of New Jersey and elsewhere, the defendants,

TROY D. CORBETT, JR., DYSHAWN WILLIAMS, and ANTWUAN BROWN

did knowingly and willfully conspire and agree with each other and others to obstruct, delay, and affect, and attempt to obstruct, delay and affect, commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten physical violence to the person and property of another.

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

COUNT TWO

(Assaulting, Resisting, or Impeding Certain Officers or Employees)

On or about November 3, 2023, in Essex County, in the District of New Jersey and elsewhere, the defendants,

TROY D. CORBETT, JR., and DYSHAWN WILLIAMS,

did forcibly assault, resist, oppose, impede, intimidate, and interfere with a person designated in Title 18, United States Code, Section 1114, namely a mail carrier employed by the United States Postal Service ("Victim-1"), while Victim-1 was engaged in and on account of, the performance of Victim-1's official duties, using a deadly or dangerous weapon, that is, a firearm.

In violation of Title 18, United States Code, Section 111(a)(1), (b) and Section 2.

COUNT THREE

(Wire Fraud)

On or about November 3, 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

ANTWUAN KENNETH BROWN,

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud, and to obtain money and property from the victim by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing and attempting to execute such scheme and artifice, did knowingly and intentionally transmit or cause to be transmitted signals by means of wire in interstate commerce.

In violation of Title 18, United States Code, Section 1343.

COUNT FOUR

(Aggravated Identity Theft)

On or about November 3, 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

ANTWUAN KENNETH BROWN,

did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, wire fraud, in violation of 18 U.S.C. § 1343, as described in Count Three of this Complaint, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT FIVE

(Wire Fraud)

On or about November 3, 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

KARIEEM STAMPS,

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud, and to obtain money and property from the victim by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing and attempting to execute such scheme and artifice, did knowingly and intentionally transmit or cause to be transmitted signals by means of wire in interstate commerce.

In violation of Title 18, United States Code, Section 1343.

COUNT SIX

(Aggravated Identity Theft)

On or about November 3, 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

KARIEEM STAMPS,

did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, wire fraud, in violation of 18 U.S.C. § 1343, as described in Count Five of this Complaint, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT SEVEN

(Possession of Ammunition by a Convicted Felon)

On or about January 18, 2024, in Essex County, in the District of New Jersey and elsewhere, the defendant,

TROY D. CORBETT, JR.,

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess ammunition, namely 16 rounds of 9mm Luger ammunition, that was in and affecting commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT EIGHT

(Possession with Intent to Distribute Methamphetamine)

On or about January 18, 2024, in Essex County, in the District of New Jersey and elsewhere, the defendant,

TROY D. CORBETT, JR.,

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT NINE

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about January 18, 2024, in Essex County, in the District of New Jersey and elsewhere, the defendant,

TROY D. CORBETT, JR.,

did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the drug trafficking crime described in Count Eight of this Complaint.

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

COUNT TEN

(Possession of a Firearm by a Convicted Felon)

On or about August 1, 2024, in Essex County, in the District of New Jersey and elsewhere, the defendant,

KARIEEM STAMPS,

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, namely a Glock 29 Gen5 handgun bearing serial number CCRT895 with an extended magazine and approximately 25 rounds of 9-millimeter ammunition, that was in and affecting commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

ATTACHMENT B

I, Troy A. Pittenger, am a Postal Inspector with the United States Postal Inspection Service ("USPIS"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, the statements of individuals, and my review of reports, documents, and other items of evidence. 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 statements of others are related herein, they are related in substance and 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.

The November 3, 2023 Gunpoint Robbery of a Mail Carrier

1. Law enforcement has been investigating a gunpoint robbery of a mail carrier ("Victim-1") that occurred on or about November 3, 2023 in Newark, New Jersey (the "Robbery"). Immediately before the Robbery, three individuals wearing dark clothing and face masks exited a black sedan and approached Victim-1. One of the three individuals brandished a firearm and demanded Victim-1's property. These three individuals took Victim-1's wallet (including a Bank of America debit card), personal keys, and a cell phone. As a result of the Robbery, Victim-1 was impeded from continuing to deliver mail, which interfered with interstate commerce.

The Wire Fraud, Aggravated Identity Theft and Subsequent Investigation

- 2. On or about November 3, 2023 at around 2:30 p.m., which was approximately 10 minutes after the Robbery, the stolen Bank of America debit card was charged at a BP gas station located at 584 Springfield Avenue in Newark, New Jersey (the "BP"). The BP is approximately 1.3 miles and an approximate 5-to-8-minute drive from the location of the Robbery. This transaction passed through Bank of America's servers located outside of New Jersey.
- 3. The BP's security camera captured an image of an individual exiting a black sedan who then used the stolen Bank of America debit card. Law enforcement identified this individual as Antwuan Kenneth Brown ("BROWN") after comparing BP's video footage to BROWN's arrest photographs. In addition, law enforcement identified a United States Postal Service ("USPS") customer account under BROWN's name associated with a phone number ending in 6492 (the "6492 Number"). On or about November 4, 2023, BROWN sent messages using an Apple iCloud account associated with the 6492 Number that stated: "Shaking n[***]as that's what I was on yesterday" and "...n[***]as hit a mail man" On or about August 1, 2024, after being advised of his *Miranda* rights, BROWN admitted that he was in the Black Sedan during the Robbery, and that he used the stolen Bank of America debit card at the BP.

- 4. On or about November 3, 2023, approximately nine minutes later at approximately 2:39 p.m., the Bank of America debit card was charged at a Wendy's located at 427 Springfield Avenue in Newark, New Jersey (the "Wendy's"). The Wendy's is approximately 0.5 miles and an approximate 3-to-6-minute drive from the BP. This transaction passed through Bank of America's servers located outside of New Jersey.
- 5. A camera at the Wendy's captured images of an individual in dark clothing using the stolen Bank of America debit card at the drive-thru while driving a black sedan with a Pennsylvania license plate ending in 5987 (the "Black Sedan"). At the time of the Robbery, Karieem Stamps ("STAMPS") was under the supervision of the New Jersey State Parole Board (the "NJSPB"). Based on subsequent video surveillance at Foot Locker, see infra ¶ 7, the Senior Parole Officer supervising STAMPS identified the individual using the stolen Bank of America debit card at the Wendy's as STAMPS.
- 6. On or about November 3, 2023, approximately 16 minutes later at approximately 2:55 p.m., security camera footage shows the Black Sedan parking in front of 48-50 Branford Place in Newark, New Jersey ("48-50 Branford Place"). This address is approximately 1.4 miles and an approximate 7-to-14-minute drive from the Wendy's. Security camera footage shows four individuals getting out from the Black Sedan.
- 7. On or about November 3, 2023, approximately 14 minutes later at approximately 3:09 p.m., one or more individuals attempted to use the Bank of America debit card at a Foot Locker located at 146 Market Street in Newark, New Jersey (the "Foot Locker"), approximately 0.1 miles away and an approximate 3-minute walk from 48-50 Branford Place. A Foot Locker security camera captured images of BROWN, STAMPS, and two individuals wearing dark clothes that were observed exiting the Black Sedan, who law enforcement has identified as Dyshawn Williams ("WILLIAMS") and Troy D. Corbett, Jr. ("CORBETT").
- 8. At the time of the Robbery, WILLIAMS was under the supervision of the NJSPB. The Senior Parole Officer supervising WILLIAMS identified one of the individuals on the Foot Locker security footage as WILLIAMS. This Senior Parole Officer also provided WILLIAMS's cell phone number, which ended in 7191 (the "7191 Number"). License plate reader data and location information for the 7191 Number obtained pursuant to a search warrant revealed that the cell phone associated with the 7191 Number was, on approximately three occasions on or about November 3, 2023 between approximately 2:09 p.m. and 2:15 p.m. approximately five to eleven minutes before the Robbery near the Black Sedan. In addition, security camera footage shows WILLIAMS taking off his black sweatshirt, turning it outside-in, and putting the black sweatshirt back on after getting out from the Black Sedan in front of 48-50 Branford Place.

- 9. The Foot Locker security footage shows an individual wearing a black mask and a dark-colored Adidas sweatshirt. The Foot Locker security footage shows this individual using a cell phone that has as its background an image of a person wearing light clothing. On or about January 18, 2024, as explained below, law enforcement arrested CORBETT and seized his cell phone. The lock screen of this cell phone consisted of a photograph of an individual wearing a light-colored t-shirt, which resembles the background image that was depicted on the Foot Locker security footage.
- 10. On or about November 25, 2023, law enforcement located the Black Sedan and conducted a lawful search of the Black Sedan approximately two days later. During this search, law enforcement identified a pharmacy receipt from Union Care Pharmacy LLC, which is located in Elizabeth, New Jersey (the "Pharmacy"). The receipt is dated November 16, 2023, and lists CORBETT's name. Security footage from the Pharmacy showed CORBETT pick up the prescription wearing a dark-colored Adidas sweater that resembles the dark-colored Adidas sweater visible on the Foot Locker security footage.
- 11. Law enforcement identified a Capital One personal checking account in CORBETT's name (the "Checking Account"). On or about October 27, 2023, CORBETT contacted Capital One using a phone number ending in 3506 (the "3506 Number"). The 3506 Number is the primary phone number associated with the Checking Account. Location information obtained pursuant to a search warrant revealed that the cell phone associated with the 3506 Number was near the location of the Robbery at the approximate time when the Robbery occurred.

The January 18, 2024 Firearm, Ammunition and Narcotics Arrest

- 12. On or about January 18, 2024, CORBETT was stopped by law enforcement for failing to stop at a stop sign. After the stop, law enforcement determined that the vehicle driven by CORBETT was wanted in connection with an armed robbery investigation. During a subsequent frisk of CORBETT, law enforcement recovered approximately 162 pills of suspected methamphetamine, which is consistent with distribution rather than personal use. Law enforcement also recovered from CORBETT a Polymer80, Inc. Model PF940V2 9mm Luger caliber pistol, bearing no identifiable serial number, which was loaded with 16 rounds of 9mm Luger ammunition (the "Ammunition").
- 13. The Ammunition was manufactured outside of the State of New Jersey, and thus traveled in interstate commerce prior to CORBETT's possession of the Ammunition in New Jersey on or about January 18, 2024.
- 14. On or about February 23, 2018, CORBETT was convicted of the following crimes: resisting arrest or eluding an officer using a means to create a

¹ The pills field tested positive for the presence of methamphetamine.

substantial risk of causing physical injury to the public servant or another, in violation of N.J. Rev. Stat. § 2C:29-2(b); and unlawful possession of a handgun, in violation of N.J. Rev. Stat. § 2C:39-5(b)(1), for which CORBETT was subsequently sentenced to three years' imprisonment.

The August 1, 2024 Search of STAMPS's Residence

- 15. On or about August 1, 2024, while preparing to execute a search warrant at STAMPS's residence, law enforcement heard noises resembling a sliding door being rapidly opened, followed by what sounded like an object hitting the ground behind STAMPS's residence. Law enforcement subsequently identified a Glock 29 Gen5 handgun bearing serial number CCRT895 with an extended magazine and approximately 25 rounds of 9-millimeter ammunition (the "Firearm") laying in the grass approximately several feet from the sliding door behind STAMPS's residence. On or about the same date, pursuant to a legally authorized search warrant, law enforcement recovered a gun box bearing the same serial number as the Firearm from a closet that contained STAMPS's clothing and medical and legal documentation in STAMPS's name.
- 16. The Firearm was manufactured outside of the State of New Jersey, and thus traveled in interstate commerce prior to STAMPS's possession of the Firearm in New Jersey on or about August 1, 2024.
- 17. On or about January 13, 2020, STAMPS was convicted in the Superior Court of New Jersey of Receiving Stolen Property, in violation of N.J. Rev. Stat. § 2C:20-7(a), which is a crime punishable by a term of imprisonment exceeding one year.