

Approved: /s/
JUSTIN HORTON / ALEXANDRA S. MESSITER
Assistant United States Attorneys

Before: THE HONORABLE KATHARINE H. PARKER
United States Magistrate Judge
Southern District of New York

23 MAG 04472

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UNITED STATES OF AMERICA :
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 v. :
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 SAMUEL SORCE, :
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 Defendant. :
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 X

SEALED COMPLAINT
Violations of 18 U.S.C.
§§ 1951 and 924(c)
COUNTY OF OFFENSE:
New York

SOUTHERN DISTRICT OF NEW YORK, ss.:

STEPHEN JONES, being duly sworn, deposes and says that he is a Detective with the New York City Police Department ("NYPD"), and charges as follows:

COUNT ONE
(Conspiracy to Commit Hobbs Act Robbery)

1. In or about May 2023, in the Southern District of New York and elsewhere, SAMUEL SORCE, the defendant, 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, SORCE and others conspired to commit an armed robbery of a jewelry company in New York, New York, on or about May 20, 2023.

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

COUNT TWO
(Hobbs Act Robbery)

2. On or about May 20, 2023, in the Southern District of New York and elsewhere, SAMUEL SORCE, the defendant, 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, SORCE

committed, and aided and abetted the commission of, an armed robbery of a jewelry company in New York, New York, on or about May 20, 2023.

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

COUNT THREE
(Brandishing a Firearm)

3. On or about May 20, 2023, in the Southern District of New York and elsewhere, SAMUEL SORCE, the defendant, and others known and unknown, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the robbery charged in Count Two of this Complaint, knowingly used and carried a firearm, and, in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm, which was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and (ii), and 2.)

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

4. I am a Detective with the NYPD. I have been personally involved in the investigation of this matter. This affidavit is based upon my investigation, my conversations with law enforcement agents and others, 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, except where otherwise indicated.

The May 20, 2023 Armed Robbery

5. Based on my review of law enforcement and state motor vehicle registry reports, my interview of a witness, my communications with other law enforcement officers, my review of surveillance footage, and my review of data from license plate readers (“LPRs”), I have learned the following:

a. A jewelry company has a retail storefront on Elizabeth Street between Canal Street and Hester Street, in New York, New York (“Jewelry Store-1”). Jewelry Store-1 opens for business by raising a locked metal gate, and potential customers enter through a door on Elizabeth Street.

b. At approximately 9:30 a.m., on or about May 20, 2023, two vehicles arrived and parked on Elizabeth Street between Canal and Hester Streets, that is, the block on which Jewelry Store-1 is located. One vehicle was a white Hyundai Elantra bearing an apparent New York license plate (“Vehicle-1”), and the other vehicle was black Infiniti QX30 bearing an apparent New York license plate (“Vehicle-2”).

c. Earlier that morning, at approximately 6:40 a.m., on or about May 20, 2023, Vehicle-1 and Vehicle-2 crossed the Verrazano Bridge, one in front of the other, from Staten Island toward Brooklyn. At this time, both Vehicle-1 and Vehicle-2 bore New Jersey license plates that,

according to New Jersey motor vehicle registration records, are associated with Vehicle-1 and Vehicle-2, respectively.

d. Shortly thereafter, at approximately 8:00 a.m., on or about May 20, 2023, Vehicle-1 and Vehicle-2 crossed over the Manhattan Bridge from Brooklyn into Manhattan. At this time, according to images taken by LPRs, Vehicle-1 and Vehicle-2 both bore apparently fraudulent New York license plates (that is, there are no records of either license plate number in New York's motor vehicle registration records).

e. At approximately 9:38 a.m., on or about May 20, 2023, two individuals ("Robber-1" and "Robber-2") exited Vehicle-1 on Elizabeth Street, on the same block as Jewelry Store-1. As depicted below, Robber-1 and Robber-2 moved an orange construction barrier. Robber-1 (pictured on the right below) wore an orange and yellow construction vest.



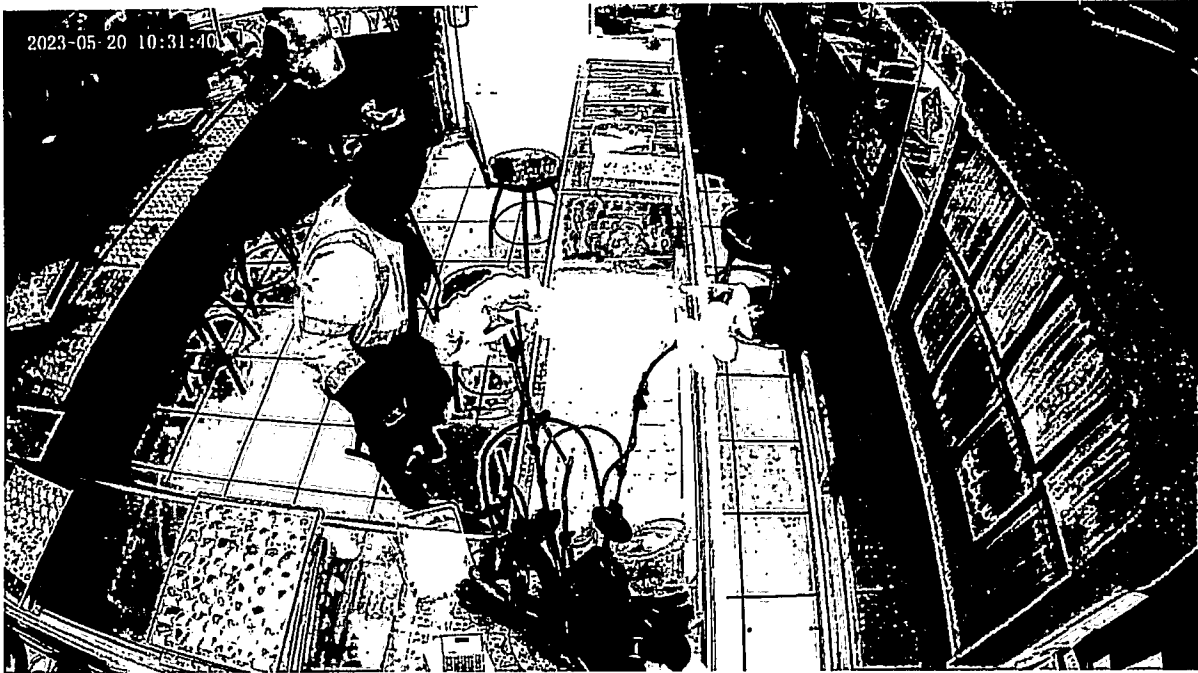
f. Shortly thereafter, between approximately 9:39 a.m. and 10:27 a.m., Robber-1—wearing blue jeans, white athletic shoes, and the same orange and yellow construction vest as shown in the earlier image above—stood in front of Vehicle-2 with an individual wearing black Under Armor-brand athletic shoes with a white band, light blue jeans with holes around the kneecap or thigh, a black sweatshirt with the brand name "Adidas" across its chest, and a similar neon green hat ("Robber-3").



g. At approximately 9:45 a.m., as depicted below, Robber-1 entered Vehicle-2 from the passenger side before moving over to sit in Vehicle-2's driver's seat.



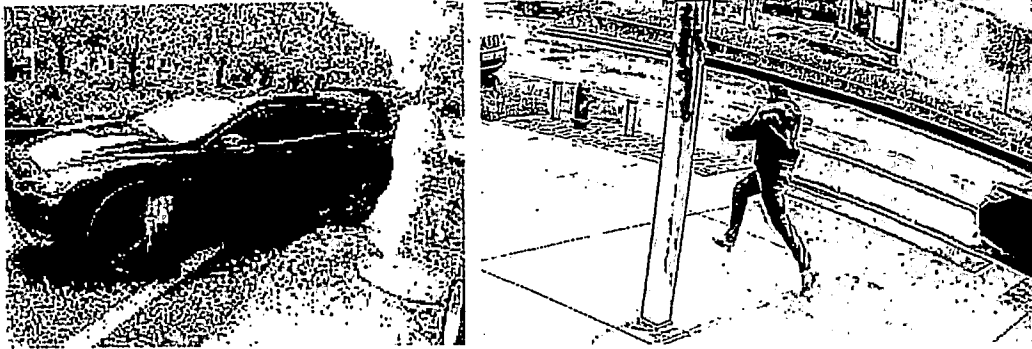
h. At approximately 10:27 a.m., as depicted below, Robber-3 (in blue jeans, at top of image) and another individual (wearing a black hood and brandishing a gun in their right hand, at bottom of image) ("Robber-4") entered Jewelry Store-1. Robber-3 removed jewelry from a display case while Robber-4 brandished a gun and gave orders to Jewelry Store-1's other occupants.



i. After exiting Jewelry Store-1 with the stolen jewelry, Robber-3 and Robber-4 got inside of Vehicle-2 before it drove away northbound on Elizabeth Street. The image below depicts Robber-3 exiting Queen Diamond holding at least some of the stolen jewelry and preparing to enter Vehicle-2:



j. Shortly after Robber-3 and Robber-4 exited Jewelry Store-1, police were alerted to the robbery. At approximately 10:30 a.m., police began to pursue Vehicle-2. Approximately several minutes later, Robber-1, the driver of Vehicle-2, abandoned Vehicle-2 in the vicinity of 75 Montgomery Street—several blocks away from Jewelry Store-1—and fled on foot. The images below show Vehicle-2 abandoned on Montgomery Street, and Robber-1 fleeing on foot while wearing the same jeans and shoes, and removing the same green cap, as he is seen wearing in the earlier images above:



k. Certain items were left behind in Vehicle-2 after it was abandoned on Montgomery Street, including a pair of New Jersey license plates associated with Vehicle-2 and the orange and yellow construction vest that Robber-1 appears to have been wearing before the robbery.

Identification of the Defendant

6. Based on my review of law enforcement reports and state land-use records, my communications with other law enforcement officers, and my review of publicly accessible social media pages, I have learned the following:

a. Approximately five to ten minutes after the image above was taken of Robber-1 fleeing from the abandoned Vehicle-2 on Montgomery Street, an individual ("Individual-1") was stopped in the same vicinity by NYPD officers investigating the robbery of Jewelry Store-1. The officers questioned and took a photograph of Individual-1. That photograph, depicted below, shows Individual-1 wearing the same blue jeans and white athletic shoes as Robber-1 ("Photograph-1"):



b. Photograph-1 was entered into a law enforcement database that compares images including individuals' faces to identify potential matches. As depicted below, that database identified a potential match for Individual-1 in a post-arrest photograph taken by the Hoboken Police Department on or about February 10, 2023, of SAMUEL SORCE, the defendant:



c. Vehicle-1 is registered in the name of an immediate family member of SAMUEL SORCE, the defendant.

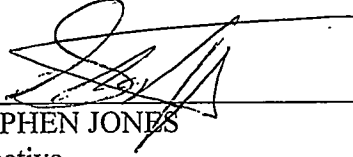
d. LPRs indicate that on multiple occasions during the week before the May 20 robbery of Jewelry Store-1, Vehicle-2 was parked in front of an address in Florham Park, New Jersey (the "Florham Park Residence"). The Florham Park Residence is owned by immediate family members of SAMUEL SORCE, the defendant, and is listed in public records databases as SORCE's residential address.

e. Vehicle-2 is registered in the name of an individual in Bridgewater, New Jersey ("Individual-2"). A public social media account in the name of Individual-2 includes a photograph, depicted below at left and posted to the public social media account on or about April 9, 2023, of Individual-2 next to an individual who resembles SAMUEL SORCE, the defendant.



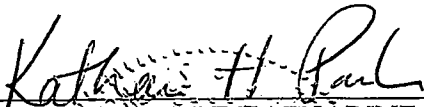
f. Accordingly, I believe that there is probable cause to believe that Robber-1 is SAMUEL SORCE, the defendant.

WHEREFORE, the deponent respectfully requests that a warrant issue for the arrest of SAMUEL SORCE, the defendant, and that he be arrested and imprisoned, or bailed, as the case may be.



STEPHEN JONES
Detective
New York City Police Department

Sworn to before me
this 1 day of June 2023



THE HONORABLE KATHARINE H. PARKER
United States Magistrate Judge
Southern District of New York

