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AT 8:30 _____ M
WILLIAM T. WALSH
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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Honorable Tonianne J. Bongiovanni
 :
 JASHAWN ROBINSON : Mag. No. 22-3040 (TJB)
 :
 :

I, Jenna Polack, the undersigned complainant being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

Jenna Polack
Jenna Polack, Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Special Agent Jenna Polack attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A) on the 14th day of September 2022.

Honorable Tonianne J. Bongiovanni
United States Magistrate Judge

Tonianne J. Bongiovanni
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Carjacking)

On or about August 29, 2021, in Middlesex County, in the District of New Jersey, and elsewhere, the defendant,

JASHAWN ROBINSON,

did take a motor vehicle, namely, a black 2014 Ford Mustang, that has been transported, shipped, and received in interstate commerce from the person and presence of another, namely Victim-1 and Victim-2, by force, violence, or intimidation, with the intent to cause death or serious bodily harm.

In violation of Title 18, United States Code, Section 2119(1).

COUNT TWO
(Discharge of a Firearm During a Crime of Violence)

On or about August 29, 2021, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

JASHAWN ROBINSON,

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, carjacking, as charged in Count One of this criminal complaint, did knowingly use and carry a firearm, which was discharged.

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

ATTACHMENT B

I, Jenna Polack, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with witnesses and other law enforcement officers, and my review of reports, documents, videos, and photographs of the evidence. Where statements of others are related herein, they are related in substance and in part. 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 I assert that an event took place on a particular date, I am asserting that it took place on or about the date and time alleged.

1. Law enforcement has been investigating an armed carjacking of two victims, hereafter Victim-1 and Victim-2, that occurred on or about August 29, 2021, at approximately 11:15 a.m., in South Brunswick, New Jersey.

2. The night before, in the evening of August 28, 2021, defendant Jashawn Robinson ("ROBINSON") drove a blue Audi (the "Audi") to Elizabeth, New Jersey, to pick up his girlfriend ("Individual-1"). Shortly thereafter, the Audi sustained a flat tire and ROBINSON and Individual-1 abandoned the Audi at a rest stop in Elizabeth. The Audi was recovered thereafter by law enforcement and ROBINSON's identification card was found in it. The Audi had been previously reported stolen in New York City on August 6, 2021.

3. ROBINSON and Individual-1 then took a rideshare to a motel in South Brunswick, New Jersey (the "Motel").

4. At approximately 11:15 p.m. on August 28, 2021, ROBINSON and Individual-1 checked into the Motel. As Individual-1 provided items, including her identification, to the Motel receptionist, ROBINSON walked into the Motel lobby and approached the reception desk wearing a dark hooded sweatshirt, dark shorts, a baseball hat, and white and black sneakers. ROBINSON was carrying a large black bag, dark sneakers, and a license plate bearing Texas registration MDZ-4604 (the "Texas license plate"). ROBINSON and Individual-1, and the items ROBINSON was carrying, were captured on the Motel's surveillance cameras. Once they were checked-in, Individual-1 and ROBINSON went to their room.

5. The next day, on August 29, 2021, Individual-1 left the Motel at approximately 10:30 a.m. ROBINSON remained at the Motel.

6. At approximately 10:50 a.m., ROBINSON exited a side door of the Motel wearing the same dark sweatshirt, shorts, and baseball hat, and he was carrying the same large black bag from the night before. He was wearing the dark sneakers, and the white and black sneakers were protruding from the

black bag. ROBINSON then re-entered the Motel, this time without the large black bag. ROBINSON's exit and re-entry were captured on the Motel's surveillance camera.

7. At approximately 11:15 a.m., ROBINSON again exited the Motel. He was wearing the same clothing as described in paragraph 6, above; however, at that time ROBINSON was wearing a gaiter-type facemask covering much of his face. ROBINSON stood on the sidewalk outside of the Motel, manipulating a cell phone in his hand, as Victim-1 and Victim-2 walked past him toward a black 2014 Ford Mustang with a tan convertible top (the "Mustang").

8. As Victim-1 and Victim-2 entered the Mustang, ROBINSON ran behind Victim-1. ROBINSON removed a handgun from his waist area, repeatedly pointed the gun at Victim-1, and forcefully pulled Victim-1 back away from the Mustang. ROBINSON discharged one round of ammunition from the gun into the air. ROBINSON then pointed the firearm at Victim-2, who had his hands in the air and was backing away from the Mustang. ROBINSON then entered the driver's side of the Mustang. He drove a short distance, stopped to collect his large black bag that was sitting on the sidewalk outside of the Motel, and drove away. The entire carjacking, including ROBINSON's discharge of the firearm, was captured on the Motel's exterior surveillance camera.

9. Law enforcement recovered one 9-millimeter discharged shell casing from the Motel parking lot in the area where ROBINSON fired the gun.

10. On or about September 27, 2021, law enforcement located the Mustang parked on a residential street in Queens, New York, with the Texas license plate affixed to it, and established surveillance. At approximately 11:30 a.m., ROBINSON entered the Mustang. As law enforcement converged and surrounded the Mustang, ROBINSON repeatedly tried to get away, including hitting parked cars and almost hitting law enforcement personnel directly. ROBINSON was removed from the Mustang and placed under arrest.

11. The Mustang was manufactured outside of the State of New Jersey, and thus moved in and affected interstate commerce prior to August 29, 2021.