
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Cathy L. Waldor
v. : Mag. No. 22-9322
: :
RAMEL HARRIS, a/k/a : **CRIMINAL COMPLAINT**
“Ramel Harrison,” and :
NEVILLE BROWN : **Filed Under Seal**

I, Jacqueline Muller, 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 Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof.

Jacqueline Muller

Jacqueline Muller, Special Agent
Federal Bureau of Investigation

Special Agent Muller attested
to this Complaint by telephone
pursuant to FRCP 4.1(b)(2)(A) on
September 1, 2022 in the
District of New Jersey

Cathy L. Waldor

HONORABLE CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

COUNT ONE

(Conspiracy to Commit Hobbs Act Robbery)

From on or about January 2, 2021 through on or about August 29, 2022, in the District of New Jersey, and elsewhere, the defendants,

**RAMEL HARRIS,
a/k/a “Ramel Harrison,” and
NEVILLE BROWN,**

did knowingly and intentionally conspire and agree with each other to obstruct, delay, or affect, commerce and the movement of articles and commodities in such commerce, by robbery, by means of actual and threatened force, or violence, or fear of injury, immediate or future, to the person and property of another, in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO
(Hobbs Act Robbery)

On or about April 10, 2021, in Morris County, in the District of New Jersey, and elsewhere, the defendants,

**RAMEL HARRIS,
a/k/a “Ramel Harrison,” and
NEVILLE BROWN,**

did knowingly and willfully obstruct, delay, or affect, or attempt or conspire to obstruct, delay, or affect, commerce and the movement of articles and commodities in such commerce, by robbery, by means of actual and threatened force, or violence, or fear of injury, immediate or future, to the person and property of another.

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

COUNT THREE
(Hobbs Act Robbery)

On or about November 6, 2021, in Middlesex County, in the District of New Jersey, and elsewhere, the defendants,

**RAMEL HARRIS,
a/k/a “Ramel Harrison,” and
NEVILLE BROWN,**

did knowingly and willfully obstruct, delay, or affect, or attempt or conspire to obstruct, delay, or affect, commerce and the movement of articles and commodities in such commerce, by robbery, by means of actual and threatened force, or violence, or fear of injury, immediate or future, to the person and property of another.

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

COUNT FOUR
(Hobbs Act Robbery)

On or about January 29, 2022, in Warren County, in the District of New Jersey, and elsewhere, the defendants,

**RAMEL HARRIS,
a/k/a “Ramel Harrison,” and
NEVILLE BROWN,**

did knowingly and willfully obstruct, delay, or affect, or attempt or conspire to obstruct, delay, or affect, commerce and the movement of articles and commodities in such commerce, by robbery, by means of actual and threatened force, or violence, or fear of injury, immediate or future, to the person and property of another.

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

COUNT FIVE

(Using, Carrying, and Brandishing a Firearm
During and in Relation to a Crime of Violence)

On or about January 29, 2022, in Warren County, in the District of New Jersey, and elsewhere, the defendants,

**RAMEL HARRIS,
a/k/a “Ramel Harrison,” and
NEVILLE BROWN,**

during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, that is, the Hobbs Act Robbery charged in Count Four of this complaint, did knowingly brandish and use a firearm.

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

ATTACHMENT B

I, Jacqueline Muller, am a Special Agent with the Federal Bureau of Investigation. 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, and items of 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 alleged.

Background of the Investigation

1. The Federal Bureau of Investigation (“FBI”) has been investigating several gunpoint robberies of check cashing establishments in different areas of New Jersey by two individuals (“the Perpetrators”), later identified as Ramel Harris (“HARRIS”) and Neville Brown (“BROWN”), who utilized a similar modus operandus consisting of committing gunpoint robberies of check cashing locations early on Saturday mornings while using zip ties to restrain female employees during the robberies. During the investigation, law enforcement learned that a large quantity of the inventory at each of the check cashing establishments was manufactured outside of the State of New Jersey and thus traveled in interstate commerce prior to each robbery. Additionally, the investigation has revealed that during the course of the conspiracy, the Perpetrators attempted to rob a check cashing location in Nanuet, New York. The investigation has also revealed that the Perpetrators appeared to have conducted surveillance before the robberies and at other check cashing establishments in each of the following locations: Mount Kisco, New York; Allentown, Pennsylvania; and West Chester, Pennsylvania.

2. During the investigation, law enforcement obtained phone records that indicate that the cell phone that HARRIS utilized between January 2021 until in or around the end of March 2022 (“the HARRIS -9292 number”) and the cell phone that BROWN utilized between January 2021 until in or around April 2022 (“the BROWN -5059 number”) communicated with each other through phone calls and text messages on each of the robbery dates that are described below, as well as the day before each of the robberies.

The Attempted Robbery in Nanuet, New York

3. On or about Saturday January 9, 2021 at approximately 8:38 a.m., law enforcement responded to a 911 call of an attempted robbery (“the Nanuet Attempted Robbery”) at a check cashing establishment located on Route 59 in Nanuet, New York (“the Nanuet Check Casher”). According to witness accounts and video surveillance footage, when an employee (“Victim-1”) of the Nanuet

Check Casher was opening the front door at the beginning of the workday, the Perpetrators got out of a nearby light-colored Dodge Charger (the “light-colored Charger”) and moved toward the entrance of the Nanuet Check Casher and attempted to enter the store by force. The Perpetrators failed to enter the Nanuet Check Casher because Victim-1 was able to lock the front door. Thereafter, the Perpetrators went back to the light-colored Dodge Charger and fled. During the investigation, law enforcement learned that HARRIS owned a light-colored Dodge Charger in early 2021.

4. Lawfully obtained location information revealed that the BROWN -5059 number was located in or around Nanuet during the morning of the Nanuet Attempted Robbery. Specifically, the location information indicates that the BROWN -5059 number was in the vicinity of the Nanuet Attempted Robbery at approximately 8:19 a.m. before next hitting off of a cell tower in New York City at approximately 1:35 p.m. where the phone remained for the rest of the day.

5. Further, during its review of one of HARRIS’s social media accounts (“Social Media Account-1”), law enforcement saw a photograph of HARRIS that was posted on January 9, 2021 – the date of the Nanuet Attempted Robbery – while HARRIS was wearing what appears to be the same camouflage pants that the Perpetrator who fits HARRIS’s physical body build was wearing during the Nanuet Attempted Robbery:



6. The investigation of the Nanuet Attempted Robbery has also revealed that the BROWN -5059 number was in the vicinity of the Nanuet Check Casher on January 2, 2021, exactly one week beforehand. Location information from January 2nd revealed that the BROWN -5059 number was first located in Brooklyn, New York that morning – BROWN resides in Brooklyn – and thereafter traveled to Nanuet where it hit off of a cell tower in the vicinity of the Nanuet Check Casher at approximately 8:29 a.m. before next hitting off of a cell tower in New York City at approximately 9:49 a.m. where the phone remained for the rest of the day.

The Robberies in New Jersey

April 10, 2021 Gunpoint Robbery in Parsippany, NJ

7. On or about Saturday April 10, 2021 at approximately 8:23 a.m., law enforcement responded to a 911 call of a gunpoint robbery (“the Parsippany Robbery”) at a check cashing establishment on Route 46 in Parsippany, New Jersey (“the Parsippany Check Casher”). According to witness accounts, video surveillance footage and evidence obtained during the investigation, the Perpetrators entered the store and one of them brandished a firearm. Thereafter, one of the Perpetrators pulled an employee from the Parsippany Check Casher (“Victim-2”) toward a locked interior door, which provides access to a secure area. The Perpetrators ordered Victim-2 to unlock the door and stated to Victim-2, in substance and in part, that if Victim-2 refused, Victim-2 would be shot in the head. Thereafter, one of the Perpetrators pulled keys from Victim-2’s hand and entered the secure area of the Parsippany Check Casher. At around this time, one of the Perpetrators forced Victim-2’s hands behind Victim-2’s back and tied them together with zip ties while Victim-2 was face down on the floor. During the course of this incident, the Perpetrators stole more than \$317,159.00, as well as some of Victim-2’s personal belongings. A review of the video surveillance footage revealed that the Perpetrators appeared to utilize the same light-colored Dodge Charger that was utilized during the Nanuet Attempted Robbery.

8. Location information from the BROWN -5059 number and from the HARRIS -9292 number revealed that both numbers were located in or around Parsippany during the morning of the Parsippany Robbery. Specifically, the location information indicates that the BROWN -5059 number hit off of a cell tower in Brooklyn at approximately 5:50 a.m. The next cell tower hit occurred in the vicinity of the Parsippany Check Casher at approximately 7:59 a.m. The BROWN -5059 number next hit off of a cell tower in the vicinity of Interstate Highway 80 at approximately 8:30 a.m. before next hitting on a cell tower in New

York City at approximately 9:40 a.m. where the phone remained for the remainder of the day.¹

9. Further, location information from the HARRIS -9292 number indicates that the HARRIS -9292 number hit off a cell tower in Brooklyn at approximately 5:50 a.m. The next cell tower hit occurred in the vicinity of the Parsippany Check Casher at approximately 7:59 a.m. before later hitting off of a cell tower in New York City at approximately 8:55 a.m. where the phone remained for the rest of the day.

10. Location information from the BROWN -5059 number from March 27, 2021 (two Saturdays before the Parsippany Robbery) revealed that the BROWN -5059 number hit off of a cell tower in Parsippany at approximately 8:28 a.m. The BROWN -5059 number later hit off of a cell tower in New York City at approximately 12:26 p.m. where the phone remained for the rest of the day.

11. Furthermore, EZ Pass records revealed that a car registered to HARRIS crossed the George Washington Bridge from New Jersey to New York City on March 27, 2021 and April 3, 2021 (the two Saturdays before the Parsippany Robbery).

November 6, 2021 Gunpoint Robbery in Old Bridge, NJ

12. On or about Saturday November 6, 2021 at approximately 8:39 a.m., law enforcement responded to a 911 call of a gunpoint robbery ("the Old Bridge Robbery") at a check cashing establishment located on Englishtown Road in Old Bridge, New Jersey ("the Old Bridge Check Casher"). According to witness accounts, video surveillance footage and evidence obtained during the investigation, one of the Perpetrators forcibly entered the Old Bridge Check Casher by pushing an employee from the Old Bridge Check Casher ("Victim-3") into the store from its entrance. Thereafter, the other Perpetrator entered the store. One of the Perpetrators forced Victim-3 to open a safe at gunpoint (while a gun was held against Victim-3's neck) and then forced Victim-3 onto the floor. One of the Perpetrators stole approximately \$109,733.00 from the safe while the other Perpetrator placed zip ties on Victim-3's hands and feet while Victim-3 was face down on the floor. Thereafter, the Perpetrators fled. During the course of the investigation, law enforcement learned that the Perpetrators drove what appeared to be a light-colored Chevrolet Impala (the "Impala") when they fled from the Old Bridge Check Casher. During the investigation, law enforcement learned that HARRIS owned a silver Chevrolet Impala in 2021.

13. Location information from the BROWN -5059 number and from the

¹ Interstate Highway 80 is a commonly traveled route between northern New Jersey and New York City.

HARRIS -9292 number revealed that both numbers were located in or around Old Bridge on the morning of the Old Bridge Robbery. Specifically, the location information indicates that the BROWN -5059 number hit off of a cell tower in Brooklyn the previous evening at approximately 11:22 p.m. The next cell tower hit occurred in the vicinity of the Parsippany Check Casher at approximately 8:04 a.m. The BROWN -5059 number later hit off of a cell tower in New York City at approximately 10:31 a.m. where the phone remained for the rest of the day.

14. Further, location information from the HARRIS -9292 number indicates that the HARRIS -9292 number hit off of a cell tower in Brooklyn in the early morning of November 6th until it first appeared on a cell tower in New Jersey at approximately 7:35 a.m. The HARRIS -9292 number hit off of a cell tower in or around Route 18 in the vicinity of East Brunswick, New Jersey at approximately 8:42 a.m.² The HARRIS -9292 number later hit off of a cell tower in New York City at approximately 10:45 a.m. where the phone remained for the rest of the day.

15. During the investigation, law enforcement obtained video surveillance footage from a location near the Old Bridge Check Casher from one week (October 30, 2021) before the Old Bridge Robbery. That video surveillance footage depicted what appears to be the same Impala parked near the Old Bridge Check Casher from approximately 7:44 a.m. until approximately 8:30 a.m. before it departed.

16. Furthermore, location information from the BROWN -5059 number from October 30th revealed that the BROWN -5059 number hit off of a cell tower on Route 18 between Old Bridge and East Brunswick at approximately 8:51 a.m. The BROWN -5059 number later hit off of a cell tower in New York City at approximately 11:11 a.m. where the phone remained for the rest of the day.

January 29, 2022 Gunpoint Robbery in Hackettstown, NJ

17. On or about Saturday January 29, 2022 at approximately 9:00 a.m., law enforcement responded to a 911 call of a gunpoint robbery (the "Hackettstown Robbery") at a check cashing establishment on Main Street in Hackettstown, New Jersey ("the Hackettstown Check Casher"). According to witness accounts, video surveillance footage and evidence obtained during the investigation, when an employee from the Hackettstown Check Casher ("Victim-4") was opening the front door at the beginning of the day, one of the Perpetrators

² Route 18 in the vicinity of East Brunswick is approximately two miles from the location of the Old Bridge Robbery. That road is also the most direct route between Old Bridge and Interstate Highway 95, which is a common highway utilized to travel between New Jersey and New York City.

forced Victim-4 back into the Hackettstown Check Casher at gunpoint and demanded that Victim-4 open a safe inside of the store. Thereafter, the other Perpetrator entered the Hackettstown Check Casher and during the course of the incident, the Perpetrators stole at least \$151,167.00 and zip-tied Victim-4's legs together before fleeing.

18. Location information from the BROWN -5059 number and from the HARRIS -9292 number revealed that both numbers were located in or around Hackettstown during the morning of the Hackettstown Robbery. Specifically, the location information indicates that the BROWN -5059 number hit off of a cell tower in Brooklyn at approximately 5:02 a.m. and then hit off of a cell tower in the vicinity of Hackettstown and Netcong, New Jersey at approximately 7:27 a.m. The BROWN -5059 number later hit off of a cell tower in New York City at approximately 11:42 a.m. where the phone remained for the rest of the day.

19. Further, location information from the HARRIS -9292 number indicates that the HARRIS -9292 number was in New York City during the early morning of January 29th before it hit off of a cell tower in New Jersey at approximately 6:11 a.m. The HARRIS -9292 number later hit off of a cell tower in the vicinity of Hackettstown and Netcong at approximately 7:27 a.m. Further location information revealed that the HARRIS -9292 number hit off of a cell tower in the vicinity of Hackettstown at approximately 7:48 a.m. and again hit off of a cell tower in the vicinity of Hackettstown at approximately 9:02 a.m. After subsequent cell tower hits in the vicinity of Netcong and Interstate Highway 80, the HARRIS -9292 number later hit off of a cell tower in New York City at approximately 10:37 a.m. where the phone remained for the rest of the day.

The Investigation

20. During the investigation of the Hackettstown Robbery, law enforcement reviewed video footage that depicted the Perpetrators utilizing what appeared to be a Ford Explorer (the "Explorer"). Specifically, the footage showed that the Perpetrators drove the Explorer and parked it close to the Hackettstown Check Casher before the Hackettstown Robbery. The footage also shows that the Perpetrators left the Hackettstown Check Casher in the Explorer.

21. On or about March 1, 2022, members of the Netcong Police Department responded to a call of an abandoned vehicle – a 2003 Ford Explorer ("the 2003 Explorer") – on private property in the rear parking lot of a pharmacy ("the Maple Avenue Pharmacy") on Maple Avenue in Netcong. Law enforcement lawfully searched the 2003 Explorer and saw a bag in the trunk that contained black clothing and a black ski mask that appeared to have been soaked in bleach based on a strong odor of bleach in the car, as well as the presence of bleach bottles in that bag. Further, law enforcement saw car keys and loose United States currency in the car. Additionally, law enforcement learned that the

license plates that were on the 2003 Explorer did not belong on the 2003 Explorer.

22. On or about March 4, 2022, law enforcement investigating the Hackettstown Robbery saw an all-points bulletin issued by the Netcong Police Department about the 2003 Explorer and believed that the 2003 Explorer appeared to be the same car that the Perpetrators used during the Hackettstown Robbery based on the similarity in color and appearance as depicted in the photo on the all-points bulletin. Thereafter, law enforcement collected video footage from the area near where the 2003 Explorer was abandoned and observed that the 2003 Explorer was driven into the Maple Avenue Pharmacy's rear parking lot on January 29th at approximately 9:18 a.m. – which is consistent with the timing of when the Perpetrators left the Hackettstown Check Casher shortly before 9:00 a.m.³ A few minutes later, the video footage showed two people walking away from the parking lot and the two people appeared to be the same size (approximate height and approximate body build) as the Perpetrators that were depicted in video footage collected in connection with the Hackettstown Robbery.

23. The video footage showed the Perpetrators walk out of the Maple Avenue Pharmacy's parking lot toward Maple Avenue and then onto the property of a nearby car dealership ("the Netcong Car Dealership"). Video footage showed the Perpetrators walk toward a white Dodge Charger ("the 2007 Charger") that was parked in the Netcong Car Dealership's parking lot, which law enforcement learned was registered to HARRIS. An employee from the Netcong Car Dealership took a video of the 2007 Charger while it was parked in the parking lot:



A further review of video footage showed the 2007 Charger arriving in the Netcong Car Dealership's parking lot at approximately 7:26 a.m. on January

³ The driving time between the Hackettstown Check Casher and the Maple Avenue Pharmacy is between 16-19 minutes depending on the traveled route. The Maple Avenue Pharmacy is very close to Interstate Highway 80.

29th. The 2007 Charger's driver got out of the car and walked toward Maple Avenue in the direction of the Maple Avenue Pharmacy where the 2003 Explorer was later abandoned.

24. Additionally, law enforcement saw a photograph of HARRIS on Social Media Account-1 in which he wore a jacket similar to one worn by the Perpetrator fitting HARRIS's physical build in Netcong on the morning of the Hackettstown Robbery as seen in video surveillance footage from January 29th:



25. Further, during the course of the investigation, law enforcement learned that the 2003 Explorer was parked in Netcong overnight from January 28, 2022 – one day before the Hackettstown Robbery – until January 29, 2022 when it was utilized by the Perpetrators during the Hackettstown Robbery because law enforcement recovered a parking ticket in the 2003 Explorer that was issued on January 29, 2022 at 2:04 a.m.

26. Importantly, location information from the BROWN -5059 number and from the HARRIS -9292 number revealed that both numbers were located in or around Netcong on January 28, 2022 – one day before the Hackettstown Robbery – for approximately under forty minutes before both phones returned to New York City for the rest of the day.

27. Additionally, law enforcement traced the purchase history of the 2003 Explorer and learned that the most recent documented transfer of ownership occurred on or about December 9, 2021 following a car auction in Meridian, Connecticut when the 2003 Explorer was acquired by an individual known to law enforcement ("Individual-1"). During a review of Social Media-

Account-1, law enforcement saw messages between HARRIS and Individual-1 concerning HARRIS's purchase of the 2003 Explorer.⁴ Based in part on those messages, law enforcement also learned that Individual-1 sold the 2003 Explorer to HARRIS in Brooklyn on or about January 1, 2022. Further, law enforcement learned that at around the time that Individual-1 sold the 2003 Explorer to HARRIS that the HARRIS -9292 number initiated a text message exchange with the BROWN -5059 number.

28. Moreover, a review of Automated License Plate Reader ("ALPR") reports revealed that the 2007 Charger was in the vicinity of Hackettstown on two prior dates before the Hackettstown Robbery. Specifically, ALPR records revealed that the 2007 Charger was on a road between Hackettstown and Netcong on January 15, 2022 at approximately 8:00 a.m., which was exactly two weeks before the Hackettstown Robbery. Additionally, ALPR records also revealed that the 2007 Charger was on a road between Hackettstown and Netcong on December 18, 2021 at approximately 7:40 a.m.; other ALPR records showed that the 2007 Charger was on the same road at approximately 9:06 a.m. that same morning (December 18th), but closer to Hackettstown. December 18, 2021 and January 15, 2022, like January 29, 2022, were Saturdays. A broader review of the 2007 Charger's ALPR records indicates that the 2007 Charger is primarily located in and around New York City, which is where HARRIS resides. Further, law enforcement learned during the investigation that BROWN also resides in New York City.

The Seizure of the 2007 Charger

29. During the course of this investigation, law enforcement surveilled HARRIS in March 2022 while he used the 2007 Charger. On or about March 25, 2022, law enforcement lawfully seized the 2007 Charger from HARRIS.⁵

30. During a review of Social Media Account-1, law enforcement saw that HARRIS and BROWN communicated via Social Media Account-1's messenger application. During a review of messages sent between HARRIS and BROWN, law enforcement learned that they met with each other on March 26, 2022. On March 27, 2022, two days after law enforcement seized the 2007 Charger from HARRIS, HARRIS and BROWN exchanged the following messages:

⁴ Law enforcement learned that the 2003 Explorer was erroneously listed for sale as a 2004 Ford Explorer. Based on the vehicle registration information associated with the 2003 Explorer, law enforcement knows that the car is a 2003 model.

⁵ HARRIS discontinued the HARRIS -9292 number on the same day (March 25, 2022) that law enforcement seized the 2007 Charger from him. BROWN discontinued the BROWN -5059 number in April 2022.

HARRIS: "Whets good comrade Been doing some thinking we had a good run...it's been real my G I'm retiring from the barbershop game love you bro stay dangerous."

BROWN replied: "Say that i was gonna have that talk cuz u definitely got a new born n u on the radar u dig."

BROWN also replied: "We gonna built tho stay ground zero u dig."

HARRIS later replied: "I still got the info on that shape up if you ever need it let me know I'll pass it on."

31. Based on my knowledge of this investigation and my training and experience, I believe that HARRIS's message about a "good run" and "retiring from the barbershop game" is coded language that is referencing HARRIS's and BROWN's involvement in the conspiracy. Further, based on my knowledge of this investigation and my training and experience, I believe that HARRIS's message about having "info on that shape up if you ever need it" is a reference to surveillance of a check cashing location in Mount Kisco, New York on March 12, 2022, which is described below.

Surveillance Of A Check Cashing Location in New York

32. ALPR records revealed that the 2007 Charger was in Scarsdale, New York on March 12, 2022 – a Saturday – at approximately 6:54 a.m. The next ALPR records revealed that the 2007 Charger entered Mount Kisco, New York at approximately 8:17 a.m. Based on my knowledge of that area, as well as a review of information on an internet mapping website, I know that the approximate driving time between Scarsdale and Mount Kisco should be approximately twenty-five minutes, especially on a Saturday morning when vehicular traffic is very light. Other ALPR records revealed that the 2007 Charger left Mount Kisco at approximately 8:41 a.m. and traveled back toward New York City. ALPR records revealed that the 2007 Charger returned to New York City at approximately 9:18 a.m. with a final ALPR record placing the 2007 Charger in Brooklyn at approximately 2:57 p.m.

33. Location information revealed that the HARRIS -9292 number traveled north from New York City on March 12, 2022 and hit off of cell towers in or around Mount Kisco between approximately 8:00 a.m. and 9:00 a.m. before traveling back to New York City where the phone remained for the rest of the day.

34. Law enforcement learned that Mount Kisco has two check cashing

establishments. Law enforcement spoke with an employee (“Employee-1”) who worked at one of those check cashing establishments (“the Mount Kisco Check Casher”) during the morning of March 12, 2022 and Employee-1 stated to law enforcement, in substance and in part, that Employee-1 saw a white Dodge Charger parked outside of the Mount Kisco Check Casher that morning.

Surveillance Of Check Cashing Locations in Pennsylvania

35. ALPR records revealed that a black 2010 Lexus that is registered to BROWN (“the 2010 Lexus”) was in the vicinity of a check cashing location on Hamilton Street in Allentown, Pennsylvania (“the Allentown Check Casher”) during the morning of August 22, 2022. Lawfully obtained location information from cell phone numbers that HARRIS (“the HARRIS -2046 number”) and BROWN (“the BROWN -0917 number”) currently utilize revealed that the HARRIS -2046 number and the BROWN -0917 number traveled together from New York City to Allentown during the morning of August 22, 2022 and remained in the area of the Allentown Check Casher for approximately one hour before driving back to New York City.

36. Further, location information from the HARRIS -2046 number number revealed that the cell phone associated with the HARRIS -2046 number traveled from Brooklyn to West Chester, Pennsylvania during the morning of August 27, 2022. The location information indicated that the HARRIS -2046 number was in the vicinity of a check cashing establishment on East Gay Street (“the West Chester Check Casher”) for approximately one hour before returning to New York City. Additionally, according to witness accounts and video surveillance footage, an individual matching HARRIS’s physical description entered the West Chester Check Casher for a brief amount of time and conversed with an employee before departing.

37. Finally, location information from the HARRIS -2046 number and location information from the BROWN -0917 number revealed that the cell phones associated with those numbers returned to the West Chester Check Casher during the morning of August 29, 2022. Law enforcement that was present in the area conducted surveillance and saw the 2010 Lexus parked in front of the West Chester Check Casher for approximately one hour. During this time, the 2010 Lexus’s driver, who matched BROWN’s physical description, entered the West Chester Check Casher and purchased a \$40 money order. Thereafter, the 2010 Lexus left the West Chester Check Casher’s parking lot and the location information indicated that the HARRIS -2046 number and the BROWN -0917 number drove back to New York City.