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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : CRIMINAL COMPLAINT  
: :  
v. : :  
: : Mag. No. 21-5013 (LHG)  
JOSHUA PEREZ : :  
: :

I, Shawn Edmonds, 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.

s/ Shawn Edmonds

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SHAWN EDMONDS  
SPECIAL AGENT  
BUREAU OF ALCOHOL, TOBACCO,  
FIREARMS AND EXPLOSIVES

ATTESTED TO BY TELEPHONE PURSUANT  
TO FED. R. CRIM. P. 4.1(B)(2)(A)  
ON FEBRUARY 11, 2021,  
IN THE DISTRICT OF NEW JERSEY



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HON. LOIS H. GOODMAN  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

**COUNT ONE**

(Carjacking)

On or about October 10, 2020, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

**JOSHUA PEREZ,**

with the intent to cause death and serious bodily harm, did knowingly take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce, namely, a 2012 Cadillac Escalade, from the person or presence of another by force and violence and by intimidation, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 2119(1) and 2.

**COUNT TWO**

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

On or about October 10, 2020, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

**JOSHUA PEREZ,**

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 brandished, and in furtherance of such crime, did knowingly possess such firearm and did aid and abet the same.

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

**COUNT THREE**

(Carjacking)

On or about December 5, 2020, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

**JOSHUA PEREZ,**

with the intent to cause death and serious bodily harm, did knowingly take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce, namely, a 2012 Nissan Altima, from the person or presence of another by force and violence and by intimidation, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 2119(1) and 2.

**COUNT FOUR**

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

On or about December 5, 2020, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

**JOSHUA PEREZ,**

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 Three of this criminal complaint, did knowingly use and carry a firearm, which was brandished, and in furtherance of such crime, did knowingly and intentionally possess such firearm, and did aid and abet the same.

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

**COUNT FIVE**

(Hobbs Act Robbery)

On or about December 5, 2020, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

**JOSHUA PEREZ,**

did knowingly and willfully obstruct, delay, and affect, and did attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce, by robbery, and committed or threatened physical violence to persons and property in furtherance thereof.

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

**COUNT SIX**

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

On or about December 5, 2020, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

**JOSHUA PEREZ,**

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, Hobbs Act robbery, as charged in Count Five of this criminal complaint, did knowingly use and carry a firearm, which was brandished, and in furtherance of such crime, did knowingly possess such firearm, and did aid and abet the same.

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

**COUNT SEVEN**

(Possession of a Firearm by a Convicted Felon)

On or about December 7, 2020, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

**JOSHUA PEREZ,**

knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Mercer County, did knowingly possess a loaded firearm, namely, a Taurus, Model G2C, .40 caliber semi-automatic handgun, bearing serial number SMD521018, and the firearm was in and affecting commerce.

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



## **ATTACHMENT B**

I, Shawn Edmonds, 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 other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and in part. Because this criminal 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 and time, I am asserting that it took place on or about the date and time alleged.

1. Since October 2020, law enforcement has investigated a series of armed robberies and carjackings perpetrated in and around Trenton, New Jersey and the surrounding community. The investigation revealed that defendant JOSHUA PEREZ (“PEREZ”), and other individuals not charged herein, committed at least three of those armed carjackings and robberies, which are summarized below.

### **The October 10, 2020 Armed Carjacking**

2. On October 10, 2020, law enforcement responded to a report of an armed robbery and carjacking of a motor vehicle located outside 300 William Street in Trenton, New Jersey (“Vehicle 1”). The two occupants of Vehicle 1 (“Victim 1” and “Victim 2”) reported that they were exiting Vehicle 1 when three men got out of a white sedan (the “White Sedan”), ran up to Victim 1 and Victim 2 and pointed handguns at them, and demanded their money and cell phones. The perpetrators also ordered Victim 1 (the driver) out of Vehicle 1 at gunpoint. After taking Victim 1’s and Victim 2’s money, purse, cell phones, and passports, two of the subjects fled in the White Sedan and one drove away in Vehicle 1. The armed carjacking was captured by security cameras in the area. Subsequent investigation revealed that the White Sedan was used in two additional armed robberies in the area within an hour of the armed carjacking of Victim 1 and Victim 2.

3. Following the carjacking and robberies described above, the White Sedan—which itself had been reported stolen on October 9, 2020—was abandoned in front of a driveway in Trenton, and it was later towed. A subsequent search of the interior of the White Sedan revealed, among other things, Victim 2’s cellular phone that had been stolen during the armed carjacking. Additionally, law enforcement identified and obtained a latent fingerprint from inside the White Sedan. Further analysis revealed that the fingerprint matched defendant PEREZ’s fingerprints.

4. On October 12, 2020, Victim 1 informed law enforcement that s/he had suspicious charges on his/her credit card, which had been stolen during the armed carjacking described above. (The charges reflected transactions made after the carjacking.) Further investigation revealed that the purchases associated with those charges were made by defendant PEREZ's sibling. During an interview with law enforcement, defendant PEREZ's sibling stated, in sum and substance, that on October 10, 2020, PEREZ had given him/her the credit card and that s/he used it to make purchases.

### **The December 5, 2020 Armed Carjacking and Armed Gas Station Robbery**

5. On December 5, 2020, law enforcement responded to a report of an armed robbery and carjacking of a motor vehicle located outside 211 Ashmore Avenue in Trenton ("Vehicle 2"). The occupant of Vehicle 2 ("Victim 3") reported that s/he had been sitting in Vehicle 2 when two men ran up to Victim 3 and pointed handguns at him/her. The men ordered Victim 3 out of the car at gunpoint and stole Victim 3's money and cell phone, as well as Vehicle 2.

6. Approximately one hour later, Vehicle 2 was itself used in another armed robbery of an individual in Trenton. Very shortly thereafter, Vehicle 2 again was used in an armed robbery of a nearby Trenton gas station ("the Gas Station"). Law enforcement officers responded to a report of an armed robbery in progress at the Gas Station and located three victims at the scene ("Victim 4," "Victim 5," and "Victim 6"). The victims reported, in sum and substance, that three males pulled up in Vehicle 2, and one of the men, hereafter referred to as "CC-1," ordered Victim 4 and Victim 5 to the ground at gunpoint, and pistol whipped and held Victim 4 and Victim 5 at gunpoint outside on the ground. Meanwhile, another subject, later identified as defendant PEREZ, entered the Gas Station and pointed a gun at Victim 6. PEREZ demanded money and a box of cigar wraps from the Gas Station. All three suspects then fled the area in Vehicle 2. Victim 6 noted to law enforcement that one of the perpetrators—later identified as defendant PEREZ—had a distinctive tattoo on his left arm, which was visible when he pointed the gun at Victim 6.

7. Law enforcement obtained and reviewed the Gas Station's security camera footage, which captured the armed robbery in progress. As Victim 6 had described, the video footage showed (i) the individual later identified as defendant PEREZ pointing a handgun at Victim 6, and (ii) the distinctive tattoo on the individual's left arm. The video footage also showed the individual later identified as defendant PEREZ wearing distinctive white Nike air force one sneakers, and CC-1 wearing a distinctive fanny-pack-style bag with the word "supreme" on it.

8. Shortly after the armed robbery of the Gas Station, law enforcement identified Vehicle 2 parked in a parking lot located at 145 Morris Avenue in Trenton. Law enforcement obtained and reviewed security camera footage of the parking lot, and observed that approximately fifteen minutes after the armed robbery of the Gas Station, Vehicle 2 was driven through a nearby alley to the parking lot, at which time PEREZ and CC-1 got out of Vehicle 2 and walked back down the alley.

### **The December 7, 2020 Search of PEREZ's Residence**

9. On December 7, 2020, based on the investigation, law enforcement executed a search warrant at PEREZ's residence in Trenton. During the search, PEREZ pointed a handgun at law enforcement officers, who ultimately placed PEREZ under arrest. Thereafter, officers recovered the firearm, later identified as a Taurus, Model G2C, .40 caliber semi-automatic handgun, bearing serial number SMD521018 (the "Firearm"). During the search, law enforcement also recovered a pair of white Nike air force one sneakers matching the appearance of the shoes that PEREZ had been wearing during the armed robbery of the Gas Station. Finally, law enforcement recovered from PEREZ's residence a fanny-pack-style bag with the word "supreme" on it, matching the appearance of the bag that CC-1 had been wearing during the armed robbery of the Gas Station.

10. Defendant PEREZ has a distinctive tattoo on his left arm matching the appearance and placement of the tattoo on the left arm of the individual who robbed the Gas Station on December 5, 2020, as described in paragraphs 6 and 7, above.

11. The Firearm was manufactured outside of the State of New Jersey and, thus, moved in interstate commerce before December 7, 2020.

12. Before December 7, 2020, PEREZ was convicted of a crime punishable by a term of imprisonment exceeding one year in the Superior Court of New Jersey, Mercer County. Specifically, on or about December 27, 2017, PEREZ was convicted of eluding, in violation of N.J.S.A. 2C:39-5(b), and he was sentenced to three years' imprisonment.