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Approved: Emily Deininger  
EMILY DEININGER  
Assistant United States Attorney

Before: HONORABLE LISA MARGARET SMITH  
United States Magistrate Judge  
Southern District of New York

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18mag9428

COMPLAINT

UNITED STATES OF AMERICA :  
- v. - :  
MARVIN WILLIAMS, :  
NICHOLAS DIXON, :  
a/k/a "Robbie," :  
JASON HIGNEY, :  
BESAR ISMAILI, :  
STEVEN KLEIN, :  
LASHAUMBA RANDOLPH, :  
ABDURAHAMIN SHABAZZ, :  
a/k/a "Abdurahmin Shebazz," :  
a/k/a "Abdur," :  
Defendants. :

Violations of  
18 U.S.C. §§ 371, 2312,  
2313, and 2  
COUNTY OF OFFENSE:  
WESTCHESTER

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SOUTHERN DISTRICT OF NEW YORK, ss.:

KEVIN M. GONYO, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE  
**(Conspiracy to Distribute Stolen Vehicles)**

1. From in or about October 2017 through in or about November 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, NICHOLAS DIXON, a/k/a "Robbie," JASON HIGNEY, BESAR ISMAILI, STEVEN KLEIN, LASHAUMBA RANDOLPH, and ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," the defendants, together with others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to (1) transport stolen vehicles, in violation of Title 18, United States Code, Section 2312, and (2) sell stolen vehicles, in violation of Title 18, United States Code, Section

2313.

2. It was a part and an object of the conspiracy that MARVIN WILLIAMS, NICHOLAS DIXON, a/k/a "Robbie," and JASON HIGNEY, the defendants, and others known and unknown, would and did unlawfully transport in interstate commerce stolen motor vehicles, knowing the same to be stolen, in violation of Title 18, United States Code, Sections 2312.

3. It was a further part and object of the conspiracy that MARVIN WILLIAMS, NICHOLAS DIXON, a/k/a "Robbie," JASON HIGNEY, BESAR ISMAILI, STEVEN KLEIN, LASHAUMBA RANDOLPH, and ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," the defendants, and others known and unknown, would and did receive, possess, conceal, store, barter, sell, and dispose of stolen motor vehicles, which had crossed a State or United States boundary after being stolen, in interstate commerce, knowing the same to be stolen, in violation of Title 18, United States Code, Section 2313.

#### OVERT ACTS

4. In furtherance of the conspiracy and to effect the illegal objects thereof, MARVIN WILLIAMS, NICHOLAS DIXON, a/k/a "Robbie," JASON HIGNEY, BESAR ISMAILI, STEVEN KLEIN, LASHAUMBA RANDOLPH, and ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," the defendants, together with others known and unknown, committed the following overt acts, in the Southern District of New York and elsewhere:

a. On or about July 19, 2018, WILLIAMS operated a stolen white Lamborghini Huracan in the Southern District of New York.

b. On or about September 20, 2018, DIXON and HIGNEY met in Tamarac, Florida, where DIXON provided HIGNEY with two stolen black Land Rover Range Rovers.

c. On or about September 18, 2018, ISMAILI and WILLIAMS participated in a phone call in which they discussed purchasing and selling a stolen Rolls Royce.

d. On or about July 12, 2018, KLEIN met an individual who was purchasing a stolen black 2014 BMW 435i at the Westchester County Airport in White Plains, New York.

e. On or about September 7, 2018, SHABAZZ met

with WILLIAMS in Providence, Rhode Island, to provide him with fake documents for stolen vehicles.

f. On or about September 14, 2018, RANDOLPH sent WILLIAMS a package containing fake documents for stolen vehicles.

g. On or about September 22, 2018, HIGNEY transported a stolen black Land Rover Range Rover through the Southern District of New York to Connecticut.

(Title 18, United States Code, Section 371.)

**COUNT TWO**  
**(Transportation of Stolen Vehicles)**

5. On or about September 21, 2018 through on or about September 22, 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, NICHOLAS DIXON, and JASON HIGNEY, the defendants, did transport in interstate commerce two stolen motor vehicles, knowing the vehicles to have been stolen, to wit, WILLIAMS, DIXON, and HIGNEY transported a stolen black 2018 Land Rover Range Rover bearing VIN<sup>1</sup> ending 7428, and a stolen black 2015 Land Rover Range Rover bearing VIN ending 8398, from Florida, through the Southern District of New York, to Connecticut.

(Title 18, United States Code, Sections 2312 and 2.)

**COUNT THREE**  
**(Sale of Stolen Vehicles)**

6. In or about December 2017, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, the defendant, did receive, possess, conceal, store, barter, sell and dispose of two stolen motor vehicles, to wit, a blue 2017 Nissan Titan bearing VIN ending 9399 and a red 2017 Nissan Titan bearing VIN ending 4751, which vehicles had crossed a State boundary after being stolen, knowing the vehicles to have been stolen, to wit, WILLIAMS sold a stolen blue 2017 Nissan Titan bearing VIN ending 9399 and a red 2017 Nissan Titan bearing VIN ending 4751, both of which had been transported from Florida, to individuals residing in the Southern District of New York.

(Title 18, United States Code, Section 2313 and 2.)

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<sup>1</sup> Vehicle Identification Numbers, or "VINs," are composed of 17 characters and serve as unique identifiers for specific vehicles. No two vehicles in operation have the same VIN. VIN numbers can generally be found in various locations on a vehicle, including the dashboard, door jamb, and vehicle frame.

**COUNT FOUR**  
**(Sale of Stolen Vehicle)**

7. In or about July 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS and STEVEN KLEIN, the defendants, did receive, possess, conceal, store, barter, sell and dispose of a stolen motor vehicle, to wit, a black 2014 BMW 435i bearing VIN ending 1110, which vehicle had crossed a State boundary after being stolen, knowing the same to have been stolen, to wit, WILLIAMS and KLEIN sold a stolen black 2014 BMW 435i bearing VIN ending 1110 that had been transported from Florida to Connecticut, and KLEIN met with the purchaser in the Southern District of New York in furtherance of the transaction.

(Title 18, United States Code, Section 2313 and 2.)

**COUNT FIVE**  
**(Possession of Stolen Vehicles)**

8. In or about July 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, the defendant, did receive, possess, conceal, store, barter, sell and dispose of a stolen motor vehicle, to wit, a white 2015 Lamborghini Huracan bearing VIN ending 0864, which vehicle had crossed a State boundary after being stolen, knowing the vehicle to have been stolen, to wit, WILLIAMS possessed a stolen white 2015 Lamborghini Huracan bearing VIN ending 0864, in the Southern District of New York, which had been transported from Florida.

(Title 18, United States Code, Section 2313 and 2.)

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

9. I am a Special Agent with the FBI, and I have been personally involved in the investigation of this matter. This affidavit is based upon that experience, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this affidavit is being submitted for the limited purpose of demonstrating 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.

## BACKGROUND

10. Since in or about March 2018, the New York State Police ("NYSP") has been investigating a multi-state scheme involving the transportation and sale of stolen vehicles. In or about May 2018, the FBI joined the investigation, and I have been the case agent since then.

11. As part of that investigation, from on or about September 4, 2018, through on or about September 28, 2018, other law enforcement officers and I intercepted telephone calls and text messages over a phone used by MARVIN WILLIAMS ("the Williams Phone"),<sup>2</sup> pursuant to a court-authorized wiretap (the "Williams Wiretap"). The investigation also included and yielded, among other things, physical surveillance, pole camera footage, cell site data, information obtained from the South Dakota Division of Motor Vehicles ("SDDMV"), interviews of victims, and records of online advertisements and transactions.

12. Based on the foregoing and other evidence, as set forth below, there is probable cause to believe that MARVIN WILLIAMS, NICHOLAS DIXON, a/k/a "Robbie," JASON HIGNEY, BESAR ISMAILI, STEVEN KLEIN, LASHAUMBA RANDOLPH, and ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," the defendants, operated a stolen car ring, during which they (1) obtained stolen vehicles from, among other places, Michigan and Florida; (2) transported the stolen vehicles to, among other places, the Southern District of New York and Connecticut, for resale; (3) created and/or obtained false titles, registrations, and temporary license plates for stolen vehicles; (4) used the false vehicle records to deceive (a) buyers of the stolen vehicles, and/or (b) the SDDMV, among other places, to obtain new titles and registrations for the stolen vehicles; and (5) used online markets, among other things, to solicit purchasers of the stolen vehicles in various states, including in the Southern District of New York. The investigation to date has revealed that by this criminal scheme the defendants have obtained, transported, and sold or attempted to sell approximately sixty vehicles worth, in total, approximately \$3,100,000.

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<sup>2</sup> I believe that MARVIN WILLIAMS, the defendant, uses the Williams Phone because, among other things, (1) on or about August 9, 2018, WILLIAMS provided that number to the South Dakota Department of Motor Vehicles, (2) I have observed WILLIAMS participate in meetings with co-conspirators after those meetings were arranged in communications intercepted over the Williams Wiretap, and (3) during those meetings, I recognized WILLIAMS as one and the same as the individual pictured in the photograph on the New Jersey's driver's license for WILLIAMS.

**I. MARVIN WILLIAMS, the Defendant, Registers Stolen Vehicles with the SDDMV**

13. I have reviewed records obtained from the SDDMV, which show that MARVIN WILLIAMS, the defendant, who resides in Connecticut, has registered approximately forty-three vehicles in South Dakota, with the SDDMV, on behalf of himself or others, and has submitted false documentation, including false titles with invalid VINs, to the SDDMV to do so. In contrast to other states, prior to this investigation the SDDMV conducted fewer or no checks to confirm authenticity of VINs and lawful ownership in connection with registration of vehicles.

14. Based on my review of SDDMV records, compared with other records, including records from the FBI's National Crime Information Center ("NCIC") database, I have found that at least ten of the vehicles MARVIN WILLIAMS, the defendant, registered through the SDDMV were reported stolen. In addition, based on searches conducted in VIN Check, a publically available VIN database, and information provided from vehicle manufacturers, including Ford and Fiat Chrysler Automotive, I know that at least approximately twenty of the vehicles that MARVIN WILLIAMS, the defendant, registered through the SDDMV were registered with invalid VIN numbers. Based on my training and experience, I know that an individual may attempt to use an invalid VIN because a records search for the vehicle's valid VIN would show that the vehicle was stolen.

**II. Late 2017–March 2018: Stolen Nissan Trucks**

***Nissan Truck-1***

15. On or about March 23, 2018, the National Insurance Crime Bureau ("NICB") reported to the NYSP that five Nissan Titan Trucks had been stolen from a Nissan dealership in Tallahassee, Florida by at least in or about October 2017. An individual ("Individual-1") who bought one of those trucks, a white 2017 Nissan Titan bearing VIN ending 4148 ("Nissan Truck-1"), informed an Investigator with the NYSP that he purchased Nissan Truck-1 in October 2017 for \$20,000 in cash, after responding to an advertisement on the online market Craigslist, from a man who identified himself as "Marvin Williams." Based on my training, experience, and information obtained from other law enforcement agents, I believe that Nissan Truck-1 was worth more than twice what Individual-1 paid for it.

### ***Nissan Truck-2***

16. On or about March 23, 2018, the NICB informed the NYSP that an advertisement was posted on the online auction site eBay for a Nissan Titan truck with a VIN that was identical, except for one digit, to the VIN for a blue 2017 Nissan Titan Truck bearing VIN ending 9399, another one of the stolen trucks from the Tallahassee Nissan dealership, discussed above ("Nissan Truck-2"). Records obtained from the SDDMV establish that Nissan Truck-2 was registered to an individual with an address in Mohegan Lake, Westchester County ("Individual-2" and the "Mohegan Lake Residence").

17. I have reviewed a report of the NYSP and spoken to an Investigator with the NYSP. Based on that report and those conversations, I have learned that, while conducting physical surveillance in the vicinity of the Mohegan Lake Residence, law enforcement agents observed and conducted a traffic stop of a Nissan Titan truck. A check of the VIN located on the truck's dashboard revealed it to be Nissan Truck-2.

18. I have reviewed records obtained from eBay. According to the records, "Marvin Williams" was listed as the shipping recipient for the account that posted the eBay advertisement for Nissan Truck-2.

19. I have also reviewed a report of an interview of Individual-2 by Investigators with the NYSP, and reviewed phone records of Individual-2. According to the records, at around the time when Individual-2 bought Nissan Truck-2, Individual-2 was in repeated communication by phone with the seller, and the seller's phone number is a phone number used by MARVIN WILLIAMS, the defendant.<sup>3</sup>

### ***Nissan Truck-3***

20. I have reviewed records from a bank account held by MARVIN WILLIAMS, the defendant, which show that, in or about late 2017, WILLIAMS deposited two checks, for \$5,000 and \$2,000, respectively, from a Mt. Vernon company ("Company-1"), signed by the owner of the company ("Individual-3").

21. I have reviewed records from the SDDMV regarding a red 2017 Nissan Titan bearing VIN ending 4751 ("Nissan Truck-3").

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<sup>3</sup> The phone number with which Individual-2 had communication is a number that MARVIN WILLIAMS, the defendant, previously provided to law enforcement in connection with a car accident in or about 2014.

Based on those records, I know that, on or about December 15, 2017, MARVIN WILLIAMS, the defendant, paid the SDDMV to register Nissan Truck-3 in the name of Individual-3. Based on my comparison of a purported vehicle title provided to the SDDMV to register Nissan Truck-3 to a public VIN database, I know that the VIN supplied to the SDDMV for Nissan Truck-3 is invalid and that the title is a fake. The SDDMV assigned Nissan Truck-3 a South Dakota license plate number ("Nissan Truck-3 SDDMV License Plate").

22. Based on my review of license plate reader records, I know that the Nissan Truck-3 SDDMV License Plate was captured on the road in Westchester County, among other places, between December 20, 2017 and March 23, 2018.

23. I have reviewed a report of the NYSP regarding surveillance conducted on or about June 11, 2018. Based on that report, I have learned that in Mt. Vernon, New York, law enforcement officers spotted Nissan Truck-3. Upon further inspection, they confirmed that Nissan Truck-3 is among the five trucks reported stolen from Florida, discussed above. They also found the vehicle's true VIN was identical, except for one digit, from the invalid VIN used on the fake title to register Nissan Truck-3 with the SDDMV, described above.

### **III. July 2018: Stolen Lamborghini Huracan**

24. I have reviewed an NYSP incident report, which shows that, on or about July 19, 2018, a NYSP Trooper conducted a traffic stop of a white Lamborghini Huracan bearing a New Jersey license plate ("White Huracan-1"). The driver identified himself as "Marvin Williams." During the traffic stop, the Trooper was able to observe White Huracan-1's dashboard VIN.

25. A search of the NCIC database shows that White Huracan-1 was reported stolen in Miami, Florida on or about April 30, 2018.

### **IV. September 2018: Stolen Range Rovers, a Stolen Ford F-150, and a Stolen Corvette**

26. Based on my review of incident reports from the Sunrise Police Department and the Orlando Police Department, I know that, in or about September 2018, two Range Rovers, VINS ending 7428 and 8398, respectively ("Range Rover-1" and "Range Rover-2") were stolen out of Davie, Florida and Orlando, Florida, respectively.



27. On or about September 20, 2018, communications were intercepted on the Williams Phone between MARVIN WILLIAMS and JASON HIGNEY (on a particular phone number (the "Higney Phone")),<sup>4</sup> the defendants.

a. During one call, the defendants discussed, in part and substance, booking a flight to Florida for HIGNEY. WILLIAMS said to HIGNEY, among other things, ". . . it's two Range Rovers so you'll drive back one."

b. Less than two hours later, during another intercepted call, WILLIAMS told HIGNEY, among other things, that he had to "run out to Mass . . . because I have some new connection up by Mass. That basically, I could get the same situation done that I'm getting out in South Dakota, done in Mass . . . ."

c. Later that day, during another intercepted call, WILLIAMS told HIGNEY, among other things, "I'll probably have to give you some cash, and I gotta give you the uh, the plates and shit to uh, to bring down there."

d. Later, HIGNEY texted WILLIAMS: "[s]end me Home Boy's number with the red 150."

28. On or about the same day, September 20, 2018, another call was intercepted on the Williams Phone between MARVIN WILLIAMS, the defendant, and another individual ("CC-1"). During the call, WILLIAMS said, among other things, "my boys are flying in tonight, well today, so they coming in today to basically pick it up because what happens is they going to drive it up to me so if I don't have to put like you know, no dealer plates or nothing on it. . . ."

29. I have spoken to a Transportation Security Administration Officer ("TSA Officer-1") who was on duty at Bradley International Airport in Hartford, Connecticut, on or about September 20, 2018. According to TSA Officer-1, JASON HIGNEY, the defendant, and a travelling companion ("UM-1") came through security at the airport that day. TSA Officer-1 found in the bag of UM-1 two license plates, one from South Dakota and one from New

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<sup>4</sup> I believe that it was JASON HIGNEY, the defendant, intercepted in the calls discussed above because, among other things, the call number is subscribed to "Jason Higney" at a residence in Terryville, Connecticut, and because HIGNEY was observed meeting with MARVIN WILLIAMS, the defendant, on or about September 22, 2018, and was recognized based on the photograph on the Connecticut driver's license for HIGNEY, after that meeting was arranged in conversations and text messages intercepted over the Williams Wiretap.

Jersey. Further, before TSA Officer-1 even discovered the plates, UM-1 told TSA Officer-1 that he didn't know how the license plates got into the bag or why they were there.

30. Based on my conversations with other FBI Special Agents, and my review of surveillance reports prepared by those agents, I know the following:

a. On or about September 20, 2018, FBI Special Agents conducting physical surveillance observed JASON HIGNEY, the defendant, and UM-1 arrive at the Fort Lauderdale-Hollywood International Airport, where they were picked up by NICHOLAS DIXON, a/k/a "Robbie," the defendant, who was driving a red Ford F-150 bearing a South Dakota license plate (the "Red F150-1").

b. DIXON drove HIGNEY and UM-1 to the parking lot of an apartment complex located in Tamarac, Florida, where HIGNEY and UM-1 picked up two black Land Rover Range Rovers.

c. Later, during further surveillance that day, law enforcement agents were able to observe the dashboard VINS on both vehicles, and identified them as Range Rover-1 and Range Rover-2.

31. Based on a review of an incident report prepared by a Deputy with the Broward County Sheriff's Office ("BCSO"), I know the following:

a. On or about September 21, 2018, NICHOLAS DIXON, a/k/a "Robbie," the defendant, was arrested for possession of two stolen vehicles. DIXON was arrested for possession of the Red F150-1, which had been reported stolen out of Miami, Florida, and a Chevrolet Corvette, VIN ending 0392 ("Corvette-1"), which had been reported stolen out of Boca Raton, Florida.

32. That same day, several calls were intercepted on the Williams Wiretap.

a. In one call, another individual ("UF-1") told MARVIN WILLIAMS, the defendant, in substance and in part, that "the police arrested Robbie for a stolen car."

b. Less than twenty minutes later, WILLIAMS was intercepted placing a call to a number used by a woman who is known to reside with WILLIAMS ("UF-2").<sup>5</sup> WILLIAMS told UF-2, in

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<sup>5</sup> I believe this call number is used by UF-2 because it is subscribed to UF-2

substance and in part, that "[w]e got a problem" because "the cops went and got Robbie," so she should "move" and "[g]et the guns out of the house."

c. Approximately five minutes later, a call was intercepted between WILLIAMS and JASON HIGNEY, the defendant, in which WILLIAMS told HIGNEY, among other things, that "down there my guy . . . got pulled over so I wanted to make sure . . . you guys didn't get pulled over." HIGNEY asked if he should be "extra more careful," and WILLIAMS confirmed that HIGNEY should "go really careful real real careful."

33. I have reviewed location data from the Higney Phone,<sup>6</sup> which shows that on or about September 22, 2018, the Higney Phone entered the State of New York, and was in the vicinity of Mount Vernon at approximately 8:58 a.m., before moving north and reaching the vicinity of Danbury, Connecticut at approximately 9:43 a.m.

34. Based on my review of a surveillance report prepared by a NYSP Investigator, I know that on or about September 22, 2018, NYSP Investigators conducting physical surveillance of JASON HIGNEY, the defendant, in the vicinity of Interstate 84, at approximately 10:45 a.m., observed HIGNEY operating Range Rover-1. HIGNEY drove Range Rover-1 to a parking lot in Waterbury, Connecticut, where he parked it next to Range Rover-2. HIGNEY was then observed meeting with MARVIN WILLIAMS, the defendant, who thereafter drove Range Rover-2 out of the parking lot.

**V. September 2018: A Stolen Ford Explorer and Another Stolen Ford F150**

35. Among the intercepted calls I have reviewed is a call between MARVIN WILLIAMS, the defendant, and an individual identified as LASHAUMBA RANDOLPH, the defendant.<sup>7</sup> During that call, WILLIAMS told RANDOLPH that he had a source who worked at a Ford dealership and who could obtain keys for vehicles so that they could then be driven off the lot and transferred to WILLIAMS. Specifically, WILLIAMS told RANDOLPH that his source "does the

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at the address where she and MARVIN WILLIAMS, the defendant, are known to reside.

<sup>6</sup> Cell site data for the Higney Phone was obtained pursuant to a Warrant and Order issued on September 20, 2018 by the Honorable Lisa Margaret Smith, United States Magistrate Judge, Southern District of New York.

<sup>7</sup> I believe that it was LASHAUMBA RANDOLPH, the defendant, intercepted in this call because, among other things, in or about October 2018, RANDOLPH provided the number that WILLIAMS was in contact with as his phone number to an officer with Pretrial Services Office in the Northern District of Georgia.

detailing and stuff on them Fords inside of the dealership" and that "every time he get one of the top quality shit he basically mark the key" and then he waits until they are all "lined up at a certain section, so what he's doing is grab and go, grab and go, and there's nothing blocking the path."

36. I have reviewed text messages exchanged between MARVIN WILLIAMS and NICHOLAS DIXON, the defendants, on or about August 27, 2018.<sup>8</sup> In the texts, the defendants discussed, in substance and in part, DIXON's booking a flight to Detroit. DIXON asked, among other things, "[H]ow long I will be up there." WILLIAMS responded, "[f]or a few min then we start heading back down . . . [t]o me."

37. I have reviewed pole camera footage from the vicinity of the residence of MARVIN WILLIAMS,<sup>9</sup> the defendant, ("Williams Residence") and location data for the Williams Phone.<sup>10</sup> According to the pole camera footage and location data, on or about August 27, 2018, WILLIAMS left his home driving a red Ford F350 bearing a South Dakota license plate (the "Red F350-1"), and arrived, on or about August 28, 2018, in Plymouth Township, Michigan.

38. On or about August 28, 2018, MARVIN WILLIAMS and NICHOLAS DIXON, a/k/a "Robbie," the defendants, exchanged several text messages about a U-Haul location in Detroit, Michigan, among other things. WILLIAMS wrote, "U know how to drive with the dolly with a car on the back of the truck," and DIXON responded, "Yes no prob." WILLIAMS also sent a picture of the Red F350-1, which had a dolly attached, on which was a blue Ford Explorer ("Blue Explorer-1").

39. Cell site data for the Williams Phone shows that the Williams Phone was in Michigan on or about August 28, 2018 at approximately 1:00 p.m., and then began moving east.

40. Pole camera footage shows that MARVIN WILLIAMS, the defendant, returned to the Williams Residence on or about August 28, 2018, at approximately 11:08 p.m., driving a white Ford F-150

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<sup>8</sup> NICHOLAS DIXON, the defendant, consented to the search of two phones that he had in his possession when he was arrested on or about September 21, 2018, and the text messages were recovered from one of those phones.

<sup>9</sup> I believe that MARVIN WILLIAMS lived at the Williams Residence until on or about November 2, 2018, based on, among other things, my review of pole camera footage showing WILLIAMS regularly entering and exiting the Williams Residence.

<sup>10</sup> Cell site data for the Williams Phone was obtained pursuant to a Warrant and Order issued on August 15, 2018 by the Honorable Lisa Margaret Smith, United States Magistrate Judge, Southern District of New York.

("White F150-1").

41. Pole camera footage shows the Red F350-1, with the dolly bearing Blue Explorer-1 still attached, in front of the Williams Residence on or about August 29, 2018 at approximately 12:24 p.m.

42. Based on my review of records obtained from the SDDMV, I know that, on or about October 22, 2018, MARVIN WILLIAMS, the defendant, registered a vehicle matching the description of the White F150-1 with the SDDMV, using an invalid VIN.

43. Based on my review of a report prepared by a Trooper with the Connecticut State Police, I know that, during a traffic stop conducted on or about October 25, 2018, the Trooper was able to observe the dashboard VIN of Blue Explorer-1. I have learned from Ford that the customer purportedly leasing Blue Explorer-1 has not made any payments, and that the company that holds the lease has not been able to successfully contact that customer.

44. Based on my experience, training, and participation in this investigation, I believe that on or about August 27, 2018, MARVIN WILLIAMS, the defendant, drove from Connecticut to Michigan to pick up two stolen vehicles, that he arranged for NICHOLAS DIXON, a/k/a "Robbie," the defendant, to fly to Michigan to drive one of the stolen vehicles, Blue Explorer-1, back to Connecticut on a dolly, and that on or about August 28, 2018, WILLIAMS drove the other stolen vehicle, White F150-1, back to Connecticut himself.

**VI. ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," the Defendant, Provides Fake Documents**

45. I have reviewed a phone call intercepted between MARVIN WILLIAMS and ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," the defendants, on or about September 6, 2018.<sup>11</sup> During that call, WILLIAMS told SHABAZZ, among other things, that he wanted to meet to get "some paperwork," that he had some vehicles for which he needed SHABAZZ "to get the title for me," and that he also "need[ed] a temp tag."

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<sup>11</sup> I believe that it was ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," the defendant, intercepted during this call because, among other things, (1) the number is subscribed to "Abdurahmin Shebazz," (2) on or about September 7, 2018, SHABAZZ was observed meeting with WILLIAMS after communications arranging those meetings were intercepted over the Williams Wiretap, and (2) SHABAZZ was recognized based on a comparison to the photograph on the Rhode Island driver's license for SHABAZZ.

46. The next day, on or about September 7, 2018, communications were intercepted between MARVIN WILLIAMS and ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," the defendants.

a. SHABAZZ sent WILLIAMS several text messages regarding vehicle documentation, telling WILLIAMS, among other things, that "the registration has the wrong name send info," that "this is a new vin," and that the "[r]egistration [was] sent."

b. Shortly thereafter, during an intercepted call, WILLIAMS told SHABAZZ, among other things, that he "went outside a few minutes ago to put the temp tag on the vehicle [and] it was the wrong vin number matching to the vehicle."

c. Approximately two and a half hours later, SHABAZZ sent WILLIAMS a text message containing a picture of a Rhode Island temporary vehicle registration for a 2018 Ford F-150 registered to JASON HIGNEY, the defendant. Based on my conversations with a NYSP Trooper, I know that Trooper was informed by the Rhode Island Division of Motor Vehicles ("Rhode Island DMV") that this was not a valid temporary vehicle registration.

d. A few hours later, WILLIAMS and SHABAZZ exchanged a series of text messages arranging an in person meeting at "wendys."

47. Based on my review of a NYSP surveillance report, I have learned that, on or about September 7, 2018, at approximately 5:15 p.m., MARVIN WILLIAMS and ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," met at a Wendy's location in Providence, Rhode Island and discussed various documents that were scattered across a table.

48. On or about September 13, 2018, two text messages were intercepted over the Williams Phone sent from MARVIN WILLIAMS, the defendant, to ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," the defendant. In those texts, WILLIAMS wrote "SALGS2RK5JA381048 2018 Range Rover sport she's black" and then "temp."

49. On or about September 14, 2018, two text messages were intercepted over the Williams Phone sent from MARVIN WILLIAMS, the defendant, to ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," the defendant, in which WILLIAMS wrote "[h]ave 5 title," and then wrote "[f]or u to get done."

50. On or about September 18, 2018, text messages were intercepted over the Williams Phone between MARVIN WILLIAMS and ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," arranging an in person meeting for that same day. In those text messages, WILLIAMS wrote to SHABAZZ, among other things, that he "need[ed a] temp," that he "ha[d] about 7 titles with me," and that he wanted to be "sure u can get them done."

51. That same day, I participated in physical surveillance of ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," and MARVIN WILLIAMS, the defendants. I have also reviewed a surveillance report prepared by a NYSP Investigator. Based on my review of that report, and my participation in the surveillance, I know that, on or about September 18, 2018, WILLIAMS met with SHABAZZ in a blue Dodge Charger Hellcat, driven by WILLIAMS, in Providence, Rhode Island. SHABAZZ brought a binder of documents with him to the meeting, and was subsequently observed at a fast food restaurant in Rhode Island talking to an unknown male and showing him vehicle titles.

52. That same day, on or about September 18, 2018, additional communications were intercepted between MARVIN WILLIAMS and ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," the defendants.

a. While SHABAZZ and WILLIAMS, were observed meeting, WILLIAMS sent SHABAZZ a text containing detailed information - the manufacturer, model, year, and color - for four vehicles.

b. A few hours later, WILLIAMS wrote to SHABAZZ that he "[n]eed[ed] another temp," and then asked SHABAZZ to "[u]pdate the Porsche Cayenne u did the other day."

53. On or about September 21, 2018, a text message from ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," the defendant, to MARVIN WILLIAMS, the defendant, was intercepted containing a picture of a Rhode Island temporary license plate for a 2018 Dodge Charger Hellcat.

54. Based on my training, experience, and participation in this investigation, I believe that MARVIN WILLIAMS, the defendant, had asked ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," the defendant, to create fake documentation, including titles and temporary license plates, for stolen vehicles, and that WILLIAMS arranged to meet with SHABAZZ

to pick up fake documentation and to provide SHABAZZ with paperwork containing details needed to create additional fake documentation.

**VII. LASHAUMBA RANDOLPH, the Defendant, Provides Fake Documents and Sells Stolen Vehicles**

***RANDOLPH Provides WILLIAMS with Fake Documents***

55. On or about September 13, 2018, calls were intercepted over the Williams Phone between MARVIN WILLIAMS and LASHAUMBA RANDOLPH, the defendants.

a. During one call, WILLIAMS and RANDOLPH discussed, in substance and in part, whether WILLIAMS had received the "pieces" that RANDOLPH had sent him for a "vette," and the information that should be included on "titles" that RANDOLPH was preparing for a white Ford F-150 and a blue Ford Explorer. WILLIAMS also told RANDOLPH, among other things, that his "homeboy" was "work[ing] on the situation, for basically picking up these trucks and shit . . . because I really don't, don't want to bring them to my spot and then God forbid they kick off any signal."

b. Later that same day, WILLIAMS told RANDOLPH, among other things, that "homeboy said make sure the title is blank because . . . he has to fill in the information for whatever stuff he has to do over there and everything to be a match." RANDOLPH agreed "they are going to be blank," and WILLIAMS then asked RANDOLPH to "overnight them to me ASAP."

56. On or about September 14, 2018, a text message was intercepted from LASHAUMBA RANDOLPH, the defendant, to MARVIN WILLIAMS, the defendant, containing a picture of a FedEx package addressed to "Oscar Williams" at the Williams Residence sent from "Randolph Holdings Inc." in Atlanta, Georgia. Based on my training, experience, and participation, I believe that package contained fake titles that RANDOLPH sent to WILLIAMS.

57. I have reviewed a call intercepted between MARVIN WILLIAMS and LASHAUMBA RANDOLPH, the defendants, on or about September 18, 2018, in which WILLIAMS tells RANDOLPH, in substance and in part, that the false documentation he received needs to be redone because "you sent me the same number for the Explorer as well as the same VIN number for the F150." WILLIAMS further reminded RANDOLPH, with regard to the VIN for the F150, that he was "supposed [to] make that up cause we was doing a complete package on the F150."



58. Based on my training, experience, and participation in this investigation, I believe that RANDOLPH provided WILLIAMS with fake documents, including fake titles, for stolen vehicles.

***RANDOLPH Sells Stolen Vehicles***

59. I have reviewed a call intercepted between MARVIN WILLIAMS and LASHAUMBA RANDOLPH, the defendants, on or about September 13, 2018, in which they discussed, in substance and in part, whether RANDOLPH could obtain new, facially legitimate documents for a 2018 GMC Yukon Denali and a 2018 Mercedes Benz G-Class SUV through the SDDMV. Specifically, RANDOLPH asked WILLIAMS if "[t]he plug in South Dakota is still good or no?," and WILLIAMS confirmed that it was.

60. Another call between MARVIN WILLIAMS and LASHAUMBA RANDOLPH, the defendants, was intercepted over the Williams Phone on or about September 21, 2018. During that call, RANDOLPH told WILLIAMS, in substance and in part, that he was "lining . . . up . . . the Tahoe and the, the Tahoe and the Suburban, the Denalis and the Chevys, the Columbias," and asked WILLIAMS if he could "process all of them, through . . . South Dakota." RANDOLPH explained that his purchaser was refusing to buy more than one vehicle until he could "make sure they go through first." WILLIAMS told RANDOLPH that the SDDMV would send the new plates.

61. Based on my training, participation, and experience in this investigation, I believe that LASHAUMBA RANDOLPH, the defendant, had MARVIN WILLIAMS, the defendant, submit fake vehicle documentation to the SDDMV to obtain new titles, registrations, and license plates that would aid RANDOLPH's sale of stolen vehicles.

**VIII. BESAR ISMAILI, the Defendant, Possesses and Sells Stolen Vehicles**

62. Based on my review of records from a bank at which BESAR ISMAILI, the defendant, holds an account, I know that ISMAILI is an owner of a company located at an address in Waterbury, Connecticut ("Company-2" and "Company-2 Address").

63. Based on my review of records from a bank at which MARVIN WILLIAMS and NICHOLAS DIXON, a/k/a "Robbie," the defendants, hold a joint account, I know that, on or about July 3, 2018, BESAR ISMAILI, the defendant, sent a wire transfer for \$7,000 to WILLIAMS and DIXON.

64. Based on my review of text messages between MARVIN WILLIAMS and NICHOLAS DIXON, the defendants, which were recovered during a consent search of a phone used by DIXON, I know that, also on or about July 3, 2018, WILLIAMS and DIXON exchanged a series of texts confirming that the "7" was "in the account," and then discussing how DIXON would drive an "Escalade" to meet WILLIAMS so that WILLIAMS could "[p]ick the cars up."

65. I participated in physical surveillance in the vicinity of the Company-2 Address on or about October 18, 2018, and have also reviewed a NYSP surveillance report regarding that surveillance. Based on my participation and review of that report, I know the following:

a. On or about October 18, 2018, a black Cadillac Escalade was observed parked outside of Company-2 at the Company-2 Address bearing VIN purportedly ending 2482 and a Rhode Island temporary plate ("Black Escalade-1").

b. A search in the Rhode Island DMV system shows that this temporary plate is not assigned to any vehicle.

66. Records obtained from the SDDMV show that MARVIN WILLIAMS, the defendant, registered Black Escalade-1 with the SDDMV on or about October 17, 2018, using an invalid VIN ending 2482.

67. Based on my review of photographs recovered during a consent search of a phone used by NICHOLAS DIXON, the defendant, I know that, on or about June 23, 2018, DIXON took several pictures of a black 2017 Cadillac Escalade bearing a California license plate. Based on a search in the FBI NCIC database, I learned (1) that Escalade was stolen from Jacksonville, Florida in or about July 2018, and (2) it bears a VIN ending 2462 that is the same, except for one digit, from the VIN observed on Black Escalade-1, ending 2482. Based on my training, experience, and participation in this investigation, I believe that the Escalade stolen from Jacksonville is one and the same as Black Escalade-1, and that Black Escalade-1's dashboard VIN had been altered and/or replaced.

68. On or about September 16, 2018, a call was intercepted over the Williams Phone between MARVIN WILLIAMS and BESAR ISMAILI,<sup>12</sup> the defendants, during which WILLIAMS and ISMAILI

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<sup>12</sup> I believe that BESAR ISMAILI, the defendant, uses the number that MARVIN WILLIAMS, the defendant, was in contact with because bank records show that ISMAILI provided it as his contact number, and, on or about October 25, 2018, law enforcement agents conducting physical surveillance of ISMAILI placed a

discussed, in substance and in part, whether ISMAILI had found a buyer for a Corvette. WILLIAMS mentioned to ISMAILI that it "might be stick shift."

69. I have reviewed a call intercepted between MARVIN WILLIAMS and NICHOLAS DIXON, the defendants, over the Williams Phone the next day, in which WILLIAMS told DIXON that he and CC-1 were "supposed to come to a price on the vette."

70. On or about September 18, 2018, a call between MARVIN WILLIAMS and NICHOLAS DIXON, the defendants, was intercepted over the Williams Phone in which DIXON told WILLIAMS, in substance and in part, that he had picked up the "vette" from CC-1, and that it drove differently because "it's a stick shift."

71. Based on my review of a BCSO incident report, I learned that, three days later, DIXON was then arrested in possession of the stolen Corvette-1, which is a stick shift.

72. On or about September 18, 2018, a call was intercepted between MARVIN WILLIAMS and BESAR ISAMILI, the defendants, in which they discussed, in substance and in part, whether ISMAILI should buy a 2015 Rolls Royce and how much they could sell it for. WILLIAMS told ISMAILI, among other things, that how much he should pay depended on whether "[y]ou have to disconnect that first," and further explained that "if that shit ain't disconnected already . . . you gotta put the thing there to try to keep it shut down." At the end of the call, WILLIAMS agreed to let ISMAILI "know how much what we can sell it for."

#### **IX. STEVEN KLEIN, the Defendant, Sells Stolen Vehicles**

73. Based on a review of records obtained from a trust company where STEVEN KLEIN, the defendant, has an account, I know that KLEIN is the owner and operator of a New Jersey car dealership registered to an address in Bridgeton, New Jersey ("Company-3" and "Company-3 Address").

74. From conversations with an FBI Special Agent, I learned that, on or about October 30, 2018, that Special Agent conducted physical surveillance and determined that Company-3 does not have an office at the Company-3 Address, which contains primarily a parking lot and a few storage units.

75. Based on my review of records from the telephone  

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call to that number and observed ISMAILI answer the phone.

service provider for a call number subscribed to Company-3, I know that the call number is associated with an address in Easton, Connecticut, where STEVEN KLEIN, the defendant, is known to reside ("Klein Residence"), not the Company-3 Address.

76. Based on my training, experience, and participation in this investigation, I know that dealer plates are license plates used by car dealerships. They are registered to the dealer, not a specific vehicle, and therefore may be moved from car to car. Dealer plates are frequently used to allow customers to legally test-drive unregistered cars on public streets and highways.

77. Based on my review of an NYSP incident report, surveillance reports prepared by FBI Special Agents, and pole camera footage, I know that, between July 19 and September 22, 2018, MARVIN WILLIAMS and JASON HIGNEY, the defendants, were observed driving multiple vehicles bearing Company-3 dealer plates, including three that are known to be stolen.

vehicles KMG

78. Based on information obtained from the New Jersey Motor Vehicle Commission, I know that Company-3 has not reported the dealer plates observed on those vehicles missing, although it has done so for another three of its eight dealer plates.

79. Based on my review of records from a bank at which STEVEN KLEIN, the defendant, holds an account, I know that on or about November 28, 2017, KLEIN sent MARVIN WILLIAMS, the defendant, a wire transfer for \$135,000.00 for a "Huracan and Hellcat." I have learned, based on my training, experience, and participation in this investigation, that the Lamborghini Huracan and Dodge Charger Hellcat WILLIAMS has been observed operating are worth more than twice that amount.

80. I have learned, from my review of a Scottsdale Police Department ("SPD") incident report and conversations with an SPD police officer ("SPD Officer"), the following:

a. On or about August 9, 2018, the SPD Officer interviewed an individual ("Individual-4"), who told the SPD Officer, in substance and in part, that in or about July 2018 he bought a black 2014 BMW 435i bearing VIN ending 1110 ("Black BMW-1") on eBay for \$18,350. He then arranged with the seller, who identified himself as "Steve Klein," to pick up the vehicle at the Klein Residence.

b. On or about July 12, 2018, Individual-4 was picked up at the Westchester County Airport in White Plains, New York by KLEIN, who then drove him to the Klein Residence. KLEIN

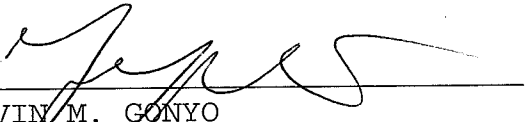
provided Individual-4 with a bill of sale and a copy of a Georgia title for Black BMW-1.

c. The bill of sale and Georgia title identify the prior owner of Black BMW-1 as "Marvin Williams."

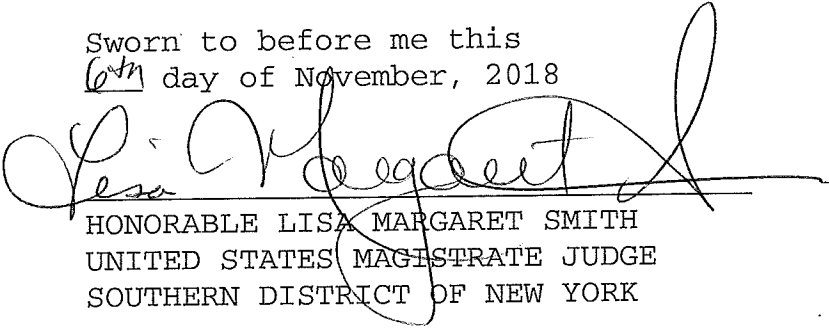
d. Black BMW-1 was reported stolen out of Orlando, Florida on or about May 24, 2018.

81. Based on my review of records obtained from the online auction market OfferUp, I know that an advertisement for the Black BMW-1 was posted by MARVIN WILLIAMS, the defendant, on or about June 4, 2018.<sup>13</sup> Based on physical surveillance that I have conducted in the vicinity of the Klein Residence, I believe that the pictures of the Black BMW-1 posted in that advertisement had been taken at the Klein Residence.

WHEREFORE, deponent prays that MARVIN WILLIAMS, NICHOLAS DIXON, a/k/a "Robbie," JASON HIGNEY, BESAR ISMAILI, STEVEN KLEIN, LASHAUMBA RANDOLPH, and ABDURAHAMIN SHABAZZ, a/k/a "Abdurahmin Shebazz," a/k/a "Abdur," the defendants, be arrested, imprisoned, or bailed, as the case may be.

  
\_\_\_\_\_  
KEVIN M. CONYO  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
6<sup>th</sup> day of November, 2018

  
\_\_\_\_\_  
HONORABLE LISA MARGARET SMITH  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK

<sup>13</sup> I believe that the account that posted the advertisement was used by MARVIN WILLIAMS, the defendant, because it is associated with an email address that WILLIAMS has used to correspond with the SDDMV.