

JMH:RWN
F. #2024R00053

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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TO BE FILED UNDER SEAL

UNITED STATES OF AMERICA

**COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF AN APPLICATION FOR
AN ARREST WARRANT**

- against -

(18 U.S.C. §§ 924(c), 1951(a))

PIERRE HUNT,

Case No. 24-MJ-227

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JENNIFER CARDILLO, being duly sworn, deposes and states that she is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), duly appointed according to law and acting as such.

On or about January 8, 2024, within the Eastern District of New York and elsewhere, the defendant PIERRE HUNT did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of United States currency from a commercial establishment located on Lewis Avenue in Brooklyn, New York.

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

On or about January 8, 2024, within the Eastern District of New York and elsewhere, the defendant PIERRE HUNT did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence, to wit: the Hobbs Act robbery described

above, and did knowingly and intentionally possess such firearm in furtherance of said crime of violence, which firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii))

The source of your deponent's information and the grounds for her belief are as follows¹:

1. I am a Special Agent assigned to the ATF Joint Robbery Task Force. I have been involved in the investigation of numerous robbery cases. I have been a Special Agent with ATF since 2015. I am familiar with the facts and circumstances set forth below from my participation in the investigation as well as my review of the investigative file, surveillance camera and body worn camera videos, and reports of other law enforcement officers involved in the investigation.

2. On January 8, 2024, at approximately 2:15 p.m., a commercial establishment located on Lewis Avenue in Brooklyn, New York (the "Store") was robbed by an individual armed with a handgun. For the reasons set forth herein, I believe that the defendant PIERRE HUNT was that individual. The Store engages in interstate commerce. The specific address of the Store is known to your affiant.

3. Based upon the review of surveillance footage from within the Store, at the aforementioned date and time, an individual—whom I believe to be PIERRE HUNT, as described in further detail below—entered the store on foot from the north on Lewis Avenue wearing sunglasses, what appear to be large diamond earrings, a dark-colored jacket, and a grey

¹ Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest, I have not set forth every fact learned during the course of this investigation.

and black knit hat. A screenshot drawn from surveillance footage showing HUNT entering the Store is set forth below.



4. HUNT then displayed a firearm to the employee behind the counter (“Victim-1”) and demanded money. Victim-1 provided HUNT with approximately \$200 United States currency from the cash register. HUNT then asked if Victim-1 had anything else. When Victim-1 responded in the negative, HUNT fired one bullet that struck the wall, exited the store, and walked northbound on Lewis Avenue toward Putnam Avenue.

5. Based upon the review of surveillance footage from nearby cameras located in the area around the Store, I know that shortly before HUNT entered the Store, a silver Nissan Rogue with a black driver’s side mirror and a silver passenger side mirror (the “Nissan Rogue”) parked at the intersection of Lewis Avenue and Putnam Avenue—one block north of the Store—and an individual wearing dark clothing consistent with the clothing depicted above exited the driver’s seat of the Nissan Rogue and walked southbound towards the Store.

6. Based upon the review of the same surveillance footage, shortly after HUNT exited the Store, an individual wearing dark clothing consistent with the clothing depicted above walked northbound on Lewis Avenue—from the direction of the Store—entered the driver's seat of the Nissan Rogue, and drove westbound on Putnam Avenue.

7. Surveillance footage from a New York State Department of Transportation camera then depicts a silver Nissan Rogue driving westbound on Putnam Avenue, approximately three blocks west of Lewis Avenue and Putnam Avenue. A screenshot from surveillance footage depicting the license plate of the Nissan Rogue is set forth below.



8. Based upon the review of law enforcement records and body worn camera footage, approximately one week after the robbery, NYPD officers observed HUNT sitting in the driver's seat of a silver 2017 Nissan Rogue with a black driver's side mirror and a silver passenger side mirror, bearing a New York license plate number ending in the digits -383, consistent with the Nissan Rogue observed in connection with the robbery. HUNT was wearing what appear to be large diamond earrings consistent with those worn by the perpetrator of the robbery, and his physical appearance is consistent with the perpetrator of the robbery. A

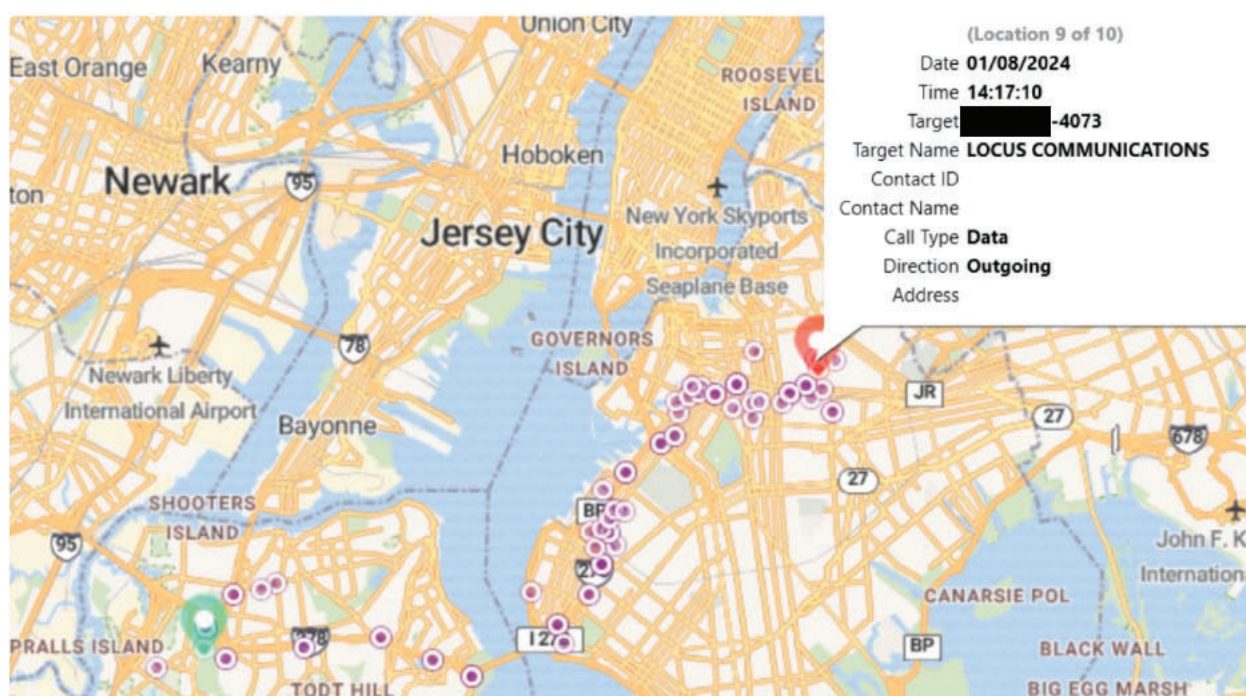
screenshot of body worn camera footage depicting HUNT during this encounter is set forth below.



9. During this encounter, HUNT provided a driver's license bearing the name PIERRE HUNT, HUNT's likeness, and a home address in Staten Island, New York (the "HUNT Home Address"). The specific address is known to your affiant. A review of law enforcement databases shows that in October 2023, during a transaction at a pawn shop the location of which is known to your affiant, HUNT provided the same driver's license and a phone number ending in -4073 (the "HUNT 4073 Number"). A review of law enforcement databases further shows that the Nissan Rogue is registered to another individual (whose name is known to your affiant) at the HUNT Home Address.

10. On February 2, 2024, the Honorable Robert M. Levy, United States Magistrate Judge, Eastern District of New York, authorized a search warrant for historical cell-site information for the HUNT 4073 Number, under Magistrate Docket Number 24-449. Historical cell-site information obtained pursuant to that warrant shows that on January 8, 2024 at approximately 12:20 p.m., the HUNT 4073 Number was located in the vicinity of the HUNT Home Address. The HUNT 4073 Number then travelled from Staten Island to Brooklyn,

crossing the Verrazano Bridge at approximately 12:54 p.m. (approximately one hour and twenty minutes before the robbery). At the same time, a license plate reader (“LPR”) captured the Nissan Rogue on the Verrazano Bridge travelling towards Brooklyn. The HUNT 4073 Number then travelled to the vicinity of the Store, where it was located while the robbery was taking place at approximately 2:17 p.m. A map depicting the locations of the HUNT 4073 Number between approximately 12:02 p.m. and 2:17 p.m. is set forth below, with the HUNT Home Address indicated with a green marker and the Store indicated with a red marker.



11. For approximately 25 minutes after the robbery, the HUNT 4073 Number travelled to multiple locations within approximately twenty blocks of the Store. At approximately 2:40 p.m., historical cell-site information shows that the HUNT 4073 Number was again located in the vicinity of the Store. At the same time, body worn camera footage of an NYPD officer who was standing outside of the Store depicts a silver Nissan Rogue driving past the Store. After that, historical cell site data shows that the HUNT 4073 Number travelled from Brooklyn to Staten Island, crossing back over the Verrazano Bridge at approximately 3:14 p.m.

At 3:13 p.m., an LPR captured the Nissan Rogue on the Verrazzano Bridge travelling towards Staten Island. The HUNT 4073 Number then returned to the vicinity of the HUNT Home Address at approximately 3:28 p.m.

12. Based on the foregoing facts, I submit that there is probable cause to believe that PIERRE HUNT was the perpetrator of the robbery and used, brandished and discharged a firearm during that robbery as described herein.

WHEREFORE, I respectfully request that the defendant PIERRE HUNT be dealt with according to law.

/s/ Jennifer Cardillo

JENNIFER CARDILLO
Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to before me by telephone this
18 day of March, 2024



THE HONORABLE PEGGY KUO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK