
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. James B. Clark, III
 :
 v. : Mag. No. 18-3099
 :
 NIFEES INGRAM :
 :
 : **CRIMINAL COMPLAINT**

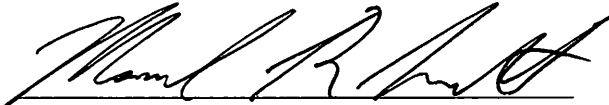
I, Michael Lovett, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

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.



Michael Lovett, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
March 29, 2018 at Newark, New Jersey

HONORABLE JAMES B. CLARK, III
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Carjacking)

On or about March 4, 2018, in Essex County, in the District of New Jersey, and elsewhere,
defendant,

NIFEES INGRAM

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 blue 2005 Ford Mustang, by force and violence and by intimidation.

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

ATTACHMENT B

I, Michael Lovett, 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.

1. At some point before March 4, 2018, a resident of New Jersey (Victim-1) used his Facebook account to advertise the sale of his car, a 2005 Ford Mustang (the "Ford").

2. On or about March 4, 2018, NIFEES INGRAM ("INGRAM") contacted Victim-1 about purchasing the Ford. During a subsequent discussion, Victim-1 and INGRAM arranged an in-person meeting to discuss the sale of the Ford. After the meeting place was changed several times, Victim-1 and two other family members (Victims 2 and 3) (collectively, "the Victims") eventually met INGRAM at a Dunkin Donuts in Elizabeth, New Jersey.

3. During the initial meeting at the Dunkin Donuts, the Victims agreed to sell the Ford to INGRAM for \$6,500 cash. The Victims agreed to follow Ingram to another location in Newark, New Jersey, in order to complete the sale of the Ford. INGRAM left the Dunkin Donuts in a vehicle driven by another unidentified individual.

4. INGRAM then went to several banks in Newark, ostensibly to obtain the cash needed to purchase the Ford. After going to those banks, INGRAM and the Victims engaged in a series of text messages during which they established a second meeting location where the sale was supposed to be finalized.

5. Once at the second location, INGRAM exited the vehicle in which he was riding and approached the Victims with a black bag. INGRAM told the Victims that the bag contained \$9,000 cash and handed the bag to Victim-2. Before Victim-2 could look in the bag, INGRAM pulled it back from Victim-2, and got into the driver's seat of the Ford while Victim-3 was still inside.

6. INGRAM immediately drove away with the Ford with Victim-3 still inside the car. INGRAM drove the Ford a distance away from Victims 1 and 2 who were left on the street. INGRAM then showed Victim-3 a handgun tucked into his waistband and ordered Victim-3 to get out of the Ford. Victim-3 complied and was forced to walk the distance back to meet Victims-1 and 2.

7. Earlier on March 4, 2018, INGRAM contacted the Facebook page of another individual (Victim-4) who had advertised the sale of a 2007 Audi Q7 (the "Audi") for sale on Facebook. During a subsequent online conversation, INGRAM contacted Victim-4 to set up a meeting location to see the Audi and take it for a test drive.

8. On or about the evening of March 12, 2018, INGRAM knocked on the door of Victim-4's residence in North Bergen, New Jersey, and asked Victim-4's teenage son (Victim-5) to view the Audi. Victim-5 showed INGRAM the vehicle and took INGRAM for a test drive.

9. After INGRAM test drove the vehicle, he showed Victim-5 a gun in his waistband, refused to let Victim-5 exit the vehicle, and drove away from North Bergen with Victim-5 still in the car. During the course of the trip, Victim-5's cell phone rang, at which time INGRAM took the phone.

10. Shortly thereafter, INGRAM stopped the vehicle in the area of Pershing Avenue in Newark, New Jersey and told Victim-5 that he had five seconds to exit the vehicle. Victim-5, unaware of his whereabouts and now without a cell phone, pleaded with INGRAM. INGRAM then began to count down from five, and when he reached the number four, he again opened his jacket and showed Victim-5 the gun in his waistband. Victim-5 exited the vehicle and ran down the street until he encountered someone to call 911.

11. CCTV footage from relevant areas, as well as exterior surveillance footage from nearby homeowners provided images of INGRAM in the area of Victim-5's home and provided a visual of a four-door vehicle that transported INGRAM to the area of Victim-5's home. That four-door vehicle was likewise seen on CCTV footage traveling immediately in front of the Audi southbound on Tonelle Avenue.

12. Further investigation into that four-door vehicle and its registered owner led to a positive identification of INGRAM and the Facebook account that INGRAM used to contact Victim-4 regarding the vehicle listed for sale.

13. Victim-5 was subsequently shown a six-photo array and positively identified INGRAM.

14. Based in part on these facts, INGRAM was charged by Complaint on March 22, 2018, with the March 12 carjacking, in violation of 18 U.S.C. § 2119, and Using or Carrying a Firearm During or in Relation to a Crime of Violence with respect to that carjacking, in violation of 18 U.S.C. § 924(c).

15. On March 29, 2018, INGRAM was arrested by federal law enforcement officers as a result of the March 22, 2018 charges. Following that arrest, in a post-*Miranda* statement, INGRAM confessed to his involvement in both the March 12, 2018 carjacking in North Bergen, New Jersey, and the March 4, 2018 carjacking in Newark, New Jersey.