

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Garrett E. Brown, Jr.,
 : U.S.D.J.
 v. :
 :
 WILLIAM VALENTIN, :
 REGALDO HERNANDEZ, : Criminal No. 08-192 (GEB)
 ANGEL CONCEPCION, :
 VALENTIN CEDENO, :
 HECTOR PEREZ, :
 QUADIR SNELL, :
 a/k/a "Q," : 18 U.S.C. § 1951
 TANYA RIVERA, and : 18 U.S.C. § 2315
 HIRAM ORTIZ : 18 U.S.C. § 2

SUPERSEDING INDICTMENT

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges:

COUNT ONE

(Conspiracy to Commit Robbery Affecting Interstate Commerce)

1. At all times relevant to this Indictment:
 - a. Defendant WILLIAM VALENTIN ("defendant VALENTIN") was a resident of Newark, New Jersey.
 - b. Defendant REGALDO HERNANDEZ ("defendant HERNANDEZ") was a resident of Newark, New Jersey.
 - c. Defendant ANGEL CONCEPCION ("defendant CONCEPCION") was a resident of Newark, New Jersey.
 - d. Defendant VALENTIN CEDENO ("defendant CEDENO") was a resident of Newark, New Jersey.
 - e. Defendant HECTOR PEREZ ("defendant PEREZ") was a resident of Newark, New Jersey.
 - f. Defendant QUADIR SNELL, a/k/a "Q" ("defendant

SNELL"), was a resident of Newark, New Jersey.

g. Defendant TANYA RIVERA ("defendant RIVERA") was a resident of Newark, New Jersey.

h. Defendant HIRAM ORTIZ ("defendant ORTIZ") was a resident of Newark, New Jersey.

i. Bailey, Banks & Biddle was a jewelry store located at the Garden State Mall in Paramus, New Jersey. Bailey, Banks & Biddle sold watches, rings, and other jewelry, which it purchased from outside the State of New Jersey. As such, Bailey, Banks & Biddle was a business engaged in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

j. Corbo Jewelers was a jewelry store located at the Rockaway Town Square Mall in Rockaway, New Jersey. Corbo Jewelers sold watches and other jewelry, which it purchased from outside the State of New Jersey. As such, Corbo Jewelers was a business engaged in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

k. J.E. Caldwell Company was a jewelry store located at the King of Prussia Court Mall in Upper Merion Township, Pennsylvania. J.E. Caldwell Company sold watches and other jewelry, which it purchased from outside the Commonwealth of Pennsylvania. As such, J.E. Caldwell Company was a business engaged in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

l. Sherman & Sons Jewelers was a jewelry store

located at the Bridgewater Commons Mall in Bridgewater, New Jersey. Sherman & Sons Jewelers sold watches and other jewelry, which it purchased from outside the State of New Jersey. As such, Sherman & Sons Jewelers was a business engaged in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

m. Mayors Jewelers was a jewelry store located at the Seminole Towne Center Mall in Sanford, Florida ("Mayors Jewelers (Florida)"). Mayors Jewelers (Florida) sold watches and other jewelry, which it purchased from outside the State of Florida. As such, Mayors Jewelers (Florida) was a business engaged in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

n. Mayors Jewelers was a jewelry store located at the Mall of Georgia in Buford, Georgia ("Mayors Jewelers (Georgia)"). Mayors Jewelers (Georgia) sold watches and other jewelry, which it purchased from outside the State of Georgia. As such, Mayors Jewelers (Georgia) was a business engaged in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

o. Ultra Diamond Outlet was a jewelry store located in Jackson Township, New Jersey. Ultra Diamond Outlet sold diamond rings and other jewelry, which it purchased from outside the State of New Jersey. As such, Ultra Diamond Outlet was a business engaged in commerce, as that term is defined in

Title 18, United States Code, Section 1951(b)(3).

2. From in or about July 2003 through in or about September 2005, in Essex County, the District of New Jersey, and elsewhere, defendants

WILLIAM VALENTIN,
REGALDO HERNANDEZ,
ANGEL CONCEPCION,
VALENTIN CEDENO,
HECTOR PEREZ,
QUADIR SNELL, a/k/a "Q,"
TANYA RIVERA, and
HIRAM ORTIZ

did knowingly and willfully conspire with one another and with others to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery of jewelry stores, namely, Bailey, Banks & Biddle; Corbo Jewelers; J.E. Caldwell Company; Sherman & Sons Jewelers; Mayors Jewelers (Florida); Mayors Jewelers (Georgia); and Ultra Diamond Outlet.

Objects

3. The objects of the conspiracy were:

- a. to rob jewelry stores in New Jersey, Pennsylvania, Georgia, Florida, and elsewhere; and
- b. to sell stolen watches and other jewelry in New Jersey.

Manner and Means

4. It was part of the conspiracy that the defendants would plan and execute "smash-and-grab" robberies of retail jewelry stores, whereby co-conspirators would smash display cases

with hammers or similar weapons, remove jewelry from those display cases, and flee to a waiting getaway car.

5. It was a further part of the conspiracy that the defendants would often steal cars to travel to jewelry stores to commit smash-and-grab robberies and to use as getaway cars following smash-and-grab robberies.

6. It was a further part of the conspiracy that the defendants would sell stolen jewelry.

7. To effect the objects of the conspiracy, the following acts, among others, were undertaken:

a. ***Bailey, Banks & Biddle Robbery***

(i) On or about July 21, 2003, defendant VALENTIN stole a car to drive to the Garden State Mall in Paramus, New Jersey and commit a robbery.

(ii) On or about July 22, 2003, defendant VALENTIN, defendant HERNANDEZ, defendant CONCEPCION, defendant PEREZ, and a co-conspirator ("CC-1") drove to the Garden State Mall in Paramus, New Jersey. Upon arrival, defendant HERNANDEZ, defendant CONCEPCION, defendant PEREZ, and CC-1 entered Bailey, Banks & Biddle at the Garden State Mall, smashed display cases with hammers or similar weapons, removed diamonds, rings, and Cartier watches valued at more than approximately \$80,000, and fled to the waiting stolen getaway car, driven by defendant VALENTIN.

b. *Corbo Jewelers Attempted Robbery*

(i) On or about August 3, 2003, defendant VALENTIN, defendant HERNANDEZ, defendant CONCEPCION, CC-1, and another co-conspirator ("CC-2") drove a stolen car to the Rockaway Town Square Mall in Rockaway, New Jersey to commit a robbery.

(ii) On or about August 3, 2003, defendant HERNANDEZ, defendant CONCEPCION, CC-1, and CC-2, armed with hammers or similar weapons, ran into the Rockaway Town Square Mall near the entrance to Corbo Jewelers. The defendants aborted the robbery and returned to the stolen getaway car, driven by defendant VALENTIN.

c. *J.E. Caldwell Company Robbery*

(i) On or about August 3, 2003, defendant VALENTIN, defendant HERNANDEZ, defendant CONCEPCION, UCC-1, and UCC-2 drove the stolen car from the Rockaway Town Square Mall to the King of Prussia Court Mall in Upper Merion Township, Pennsylvania to commit a robbery.

(ii) On or about August 3, 2003, defendant HERNANDEZ, defendant CONCEPCION, CC-1, and CC-2 entered J.E. Caldwell Company at the King of Prussia Court Mall, smashed display cases with hammers or similar weapons, removed Rolex watches valued at more than approximately \$215,000, and fled to the waiting stolen getaway car, driven by defendant VALENTIN.

d. ***Sherman & Sons Jewelers Robbery***

(i) On or about September 28, 2003, defendant HERNANDEZ and co-conspirators entered Sherman & Sons Jewelers at the Bridgewater Commons Mall in Bridgewater, New Jersey, smashed display cases with hammers or similar weapons, removed Rolex and Tag Heuer watches valued at more than approximately \$65,000, and fled the store.

e. ***Mayors Jewelers (Florida) Robbery***

(i) On or about January 8, 2004, defendant CONCEPCION, defendant CEDENO, and co-conspirators entered Mayors Jewelers (Florida), smashed display cases with hammers or similar weapons, removed Rolex watches valued at more than approximately \$485,000, and fled the store.

f. ***Mayors Jewelers (Georgia) Robbery***

(i) On or about March 22, 2004, defendant VALENTIN stole a car in or near the parking lot of the Mall of Georgia in Buford, Georgia to commit a robbery.

(ii) On or about March 22, 2004, defendant VALENTIN, defendant CEDENO, defendant SNELL, and CC-1 drove the stolen car to a loading dock at the Mall of Georgia, entered Mayors Jewelers (Georgia), smashed display cases with hammers or similar weapons, removed Rolex watches valued at more than approximately \$315,000, and fled in the stolen car.

(iii) On or about March 22, 2004, defendant VALENTIN, defendant CEDENO, defendant SNELL, and CC-1 drove the

stolen car to the waiting getaway car, driven by defendant RIVERA, whereupon they abandoned the stolen car.

g. *Ultra Diamond Outlet Robbery*

(i) On or about June 24, 2005, defendant VALENTIN drove CC-2 and another co-conspirator ("CC-3") to the Ultra Diamond Outlet in Jackson Township, New Jersey to commit a robbery.

(ii) On or about June 24, 2005, CC-2 and CC-3 entered the Ultra Diamond Outlet, smashed display cases with hammers or similar weapons, removed rings valued at more than approximately \$110,000, and fled to the waiting getaway car, driven by defendant VALENTIN.

h. *Receipt and Sale of Stolen Jewelry*

(i) From in or about July 2003 until in or about May 2004, defendant ORTIZ received from co-conspirators watches and other jewelry stolen from the jewelry stores and sold those watches and other jewelry.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO
(Robbery Affecting Interstate Commerce)

On or about July 22, 2003, in Bergen County, the District of New Jersey, and elsewhere, defendants

WILLIAM VALENTIN,
REGALDO HERNANDEZ,
ANGEL CONCEPCION, and
HECTOR PEREZ

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, and commit and threaten physical violence to employees and patrons of Bailey, Banks & Biddle, located in or around the Garden State Mall in Paramus, New Jersey, in furtherance of a plan and purpose to commit robbery, and did knowingly and willfully aid, abet, counsel, command, induce, and procure the commission of that offense.

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

COUNT THREE

(Attempt to Commit Robbery Affecting Interstate Commerce)

On or about August 3, 2003, in Rockaway, Morris County, the District of New Jersey, and elsewhere, defendants

WILLIAM VALENTIN,
REGALDO HERNANDEZ, and
ANGEL CONCEPCION

did knowingly and willfully attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery of Corbo Jewelers, located in or around the Rockaway Town Square Mall in Rockaway, New Jersey, and did knowingly and willfully aid, abet, counsel, command, induce, and procure the commission of that offense.

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

COUNT FOUR
(Robbery Affecting Interstate Commerce)

On or about August 3, 2003, in the District of New Jersey, and elsewhere, defendants

WILLIAM VALENTIN,
REGALDO HERNANDEZ, and
ANGEL CONCEPCION

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, and commit and threaten physical violence to employees and patrons of J.E. Caldwell Company, located in or around the King of Prussia Court Mall in Upper Merion Township, Pennsylvania, in furtherance of a plan and purpose to commit robbery, and did knowingly and willfully aid, abet, counsel, command, induce, and procure the commission of that offense.

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

COUNT FIVE
(Receipt of Stolen Goods)

On or about August 3, 2003, in the District of New Jersey, and elsewhere, defendants

WILLIAM VALENTIN,
REGALDO HERNANDEZ, and
ANGEL CONCEPCION

knowingly and willfully did receive, possess, conceal, store, sell, and dispose of goods, wares, and merchandise, including Rolex watches valued at \$5,000 or more, which had crossed a State boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, and did knowingly and willfully aid, abet, counsel, command, induce, and procure the commission of that offense.

In violation of Title 18, United States Code, Section 2315 and Section 2.

COUNT SIX
(Robbery Affecting Interstate Commerce)

On or about September 28, 2003, in the Township of Bridgewater, Somerset County, the District of New Jersey, and elsewhere, defendant

REGALDO HERNANDEZ

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, and commit and threaten physical violence to employees and patrons of Sherman & Sons Jewelers, located in or around the Bridgewater Commons Mall in Bridgewater, New Jersey, in furtherance of a plan and purpose to commit robbery, and did knowingly and willfully aid, abet, counsel, command, induce, and procure the commission of that offense.

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

COUNT SEVEN
(Robbery Affecting Interstate Commerce)

On or about January 8, 2004, in the District of New Jersey and elsewhere, defendants

ANGEL CONCEPCION and
VALENTIN CEDENO

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, and commit and threaten physical violence to employees and patrons of Mayors Jewelers, located in or around the Seminole Towne Center Mall in Sanford, Florida, in furtherance of a plan and purpose to commit robbery, and did knowingly and willfully aid, abet, counsel, command, induce, and procure the commission of that offense.

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

COUNT EIGHT
(Robbery Affecting Interstate Commerce)

On or about March 22, 2004, in the District of New Jersey, and elsewhere, defendants

WILLIAM VALENTIN,
VALENTIN CEDENO,
QUADIR SNELL, a/k/a "Q," and
TANYA RIVERA

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, and commit and threaten physical violence to employees and patrons of Mayors Jewelers, located in or around the Mall of Georgia in Buford, Georgia, in furtherance of a plan and purpose to commit robbery, and did knowingly and willfully aid, abet, counsel, command, induce, and procure the commission of that offense.

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

COUNT NINE

(Receipt of Stolen Goods)

From on or about March 22, 2004, until on or about May 14, 2004, in the District of New Jersey, and elsewhere, defendants

WILLIAM VALENTIN,
VALENTIN CEDENO,
QUADIR SNELL, a/k/a "Q,"
TANYA RIVERA, and
HIRAM ORTIZ

knowingly and willfully did receive, possess, conceal, store, sell, and dispose of goods, wares, and merchandise, including Rolex watches valued at \$5,000 or more, which had crossed a State boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, and did knowingly and willfully aid, abet, counsel, command, induce, and procure the commission of that offense.

In violation of Title 18, United States Code, Section 2315 and Section 2.

COUNT TEN

(Robbery Affecting Interstate Commerce)

On or about June 24, 2005, in Jackson Township, Ocean County, the District of New Jersey, and elsewhere, defendant

WILLIAM VALENTIN

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, and commit and threaten physical violence to employees and patrons of Ultra Diamond Outlet, located in or around Jackson Township, New Jersey, in furtherance of a plan and purpose to commit robbery, and did knowingly and willfully aid, abet, counsel, command, induce, and procure the commission of that offense.

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

A TRUE BILL

FOREPERSON

CHRISTOPHER J. CHRISTIE
UNITED STATES ATTORNEY