**LULIVE** 2013R01097/jgh **MAR 2 6 2015** 

# UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

AT 8:30 M WILLIAM T. WALSH, CLERK

UNITED STATES OF AMERICA

Hon. William J. Martini

v.

Crim. No. 13-705

DANIEL GATSON,

a/k/a "Tokyo Gatson,"

a/k/a "Craig,"

a/k/a "Big Country," and

ANTHONY HANKS,

a/k/a "T.J."

18 U.S.C. §§ 371, 2314, and 2

### SECOND SUPERSEDING INDICTMENT

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

### **COUNT ONE**

### (Conspiracy to Transport Stolen Property in Interstate Commerce)

1. From in or around August 2011 through on or about October 11, 2013, in Hudson County, in the District of New Jersey and elsewhere, defendants

DANIEL GATSON,
a/k/a "Tokyo Gatson,"
a/k/a "Craig,"
a/k/a "Big Country," and
ANTHONY HANKS,
a/k/a "T.J."

did knowingly and intentionally conspire and agree with each other and others to commit an offense against the United States, to wit, to transport, transmit, and transfer in interstate commerce goods, wares, merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen and converted, contrary to Title 18, United States Code, Section 2314.

- 2. The object of the conspiracy was for defendants Daniel Gatson, a/k/a "Tokyo Gatson," a/k/a "Craig," a/k/a "Big Country" ("DANIEL GATSON"), Anthony Hanks, a/k/a "T.J.," ("ANTHONY HANKS"), and others, to obtain money from burglarizing dozens of homes in New Jersey, New York, Pennsylvania, Virginia, North Carolina, Georgia, and elsewhere, and from selling property stolen from these homes to individuals in New York and elsewhere.
- 3. It was a part of the conspiracy that defendants DANIEL GATSON and ANTHONY HANKS and their co-conspirators would identify homes in affluent residential neighborhoods in New Jersey, New York, Pennsylvania, Virginia, North Carolina, Georgia, and elsewhere to burglarize.
- 4. It was a further part of the conspiracy that once the homes had been targeted, defendants DANIEL GATSON and ANTHONY HANKS and their co-conspirators would drive together, typically in groups of three or four, usually in a rented minimum, to burglarize the target residences.
- 5. It was a further part of the conspiracy that, upon arriving at a target residence, defendants DANIEL GATSON and ANTHONY HANKS and their co-conspirators would conduct surveillance of the target residence, looking for indications that no one was home, and then would cut wires running to and from the residence, including phone, cable, and alarm connections.

- 6. It was a further part of the conspiracy that defendant DANIEL GATSON and other co-conspirators, all wearing ski masks and gloves, would then forcibly break through a door and enter the target residence while a getaway driver remained nearby in a rented vehicle, often maintaining contact with one of the burglars inside the target residence by cellphone.
- 7. It was a further part of the conspiracy that defendant DANIEL GATSON and one or more of his co-conspirators would then ransack the target residence, stealing cash, jewelry, and other valuable property.
- 8. It was a further part of the conspiracy that defendants DANIEL GATSON and ANTHONY HANKS and their co-conspirators would keep the cash stolen from the homes, and convert the stolen jewelry to cash by, among other things, taking the jewelry from New Jersey, typically from defendant DANIEL GATSON's residence in North Bergen, in Hudson County, to New York City and elsewhere to sell for cash.

### **OVERT ACTS**

- 9. In furtherance of the conspiracy and in order to effect its unlawful objects, defendants DANIEL GATSON and ANTHONY HANKS and other co-conspirators committed and caused to be committed the following overt acts in the District of New Jersey and elsewhere:
  - a. On or about November 30, 2012, defendant DANIEL GATSON and others burglarized a home on McKittrick Court in Old Tappan, in Bergen County, New Jersey, stealing approximately \$6,000 in jewelry.

- b. On or about December 1, 2012, defendant DANIEL GATSON and others burglarized a home on Hilltop Court in Warren Township, in Somerset County, New Jersey, stealing over \$1.2 million in cash and jewelry.
- c. Two days later, on or about December 3, 2012, defendant DANIEL GATSON transported stolen jewelry from Bergen County, New Jersey, to New York to be sold for cash.
- d. On or about December 5, 2012, defendant DANIEL GATSON and others burglarized a home on Lincoln Woods in Harrison, in Westchester County, New York, stealing approximately \$200,000 in cash and jewelry.
- e. Following the burglary, defendant DANIEL GATSON and others transported stolen property from the site of the burglary in New York to New Jersey.
- f. The next day, on or about December 6, 2012, defendant DANIEL GATSON transported stolen jewelry from Hudson County, New Jersey, to New York to be sold for cash.
- g. On or about December 10, 2012, defendant DANIEL GATSON and others burglarized a home on Cedar Brook Court in Greenvale, in Nassau County, New York, stealing approximately \$17,000 in jewelry.

- h. Following the burglary, defendant DANIEL GATSON and others transported stolen jewelry from the site of the burglary in New York to New Jersey.
- On or about December 11, 2012, defendant DANIEL GATSON transported stolen jewelry from Hudson County, New Jersey, to New York to be sold for cash.
- j. On or about December 14, 2012, defendant DANIEL GATSON and others burglarized a home on Shady Tree Lane in Colts Neck Township, in Monmouth County, New Jersey, causing approximately \$13,000 in damage to the home.
- k. On or about December 20, 2012, defendant DANIEL GATSON and others burglarized a home on Emerald Woods Court in Upper Saddle River, in Bergen County, New Jersey.
- On or about December 21, 2012, defendant DANIEL GATSON and others burglarized a home on Glen Goin Drive in Alpine, in Bergen County, New Jersey, stealing approximately \$3,500 in jewelry and other property.
- m. On or about December 27, 2012, defendant DANIEL GATSON and others burglarized a home on Old Tappan Road in Old Tappan, in Bergen County, New Jersey, stealing approximately \$20,000 in jewelry and other property.

- n. Also on or about December 27, 2012, defendant DANIEL GATSON and others burglarized a home on Farmstead Road in Mahwah, in Bergen County, New Jersey.
- o. The next day, on or about December 28, 2012, defendant DANIEL GATSON transported stolen jewelry from Hudson County, New Jersey, to New York to be sold for cash.
- p. Later on or about December 28, 2012, defendant DANIEL GATSON and others burglarized a home on Lenape Court in Cranbury Township, in Middlesex County, New Jersey, stealing approximately \$1 million in cash and other property.
- q. Following the burglary, defendant DANIEL GATSON and others transported stolen property from the site of the burglary to Bergen County, New Jersey, and then to New York.
- r. On or about January 2, 2013, defendant DANIEL GATSON and others attempted to burglarize a home on Williams Way in Holmdel Township, in Monmouth County, New Jersey.
- s. On or about January 16, 2013, defendant DANIEL GATSON and others burglarized a home on Morgan Drive in Harding Township, in Morris County, New Jersey.
- t. On or about January 17, 2013, defendant DANIEL GATSON and others attempted to burglarize a home on Doe Trail in Marlboro Township, in Monmouth County, New Jersey.

- u. On or about January 17, 2013, defendant DANIEL GATSON and others burglarized a home on Round Hill Court in Colts Neck
   Township, in Monmouth County, New Jersey, stealing
   approximately \$37,000 in cash and jewelry.
- v. On or about January 18, 2013, defendant DANIEL GATSON and others burglarized a home on Mountain Ridge Drive in Livingston, in Essex County, New Jersey, stealing over \$15,000 in jewelry and other property.
- w. Also on or about January 18, 2013, defendant DANIEL GATSON and others burglarized a home on Lafayette Drive in Livingston, in Essex County, New Jersey, stealing approximately \$17,000 in jewelry and other property.
- x. The next day, on or about January 19, 2013, defendant DANIEL GATSON transported stolen jewelry from Hudson County, New Jersey, to New York to be sold for cash.
- y. On or about January 21, 2013, defendant DANIEL GATSON and others burglarized a home on Lasswade Lane in Oakton, in Fairfax County, Virginia, stealing approximately \$70,000 in jewelry.
- z. Following the burglary, defendant DANIEL GATSON and others transported stolen jewelry from the site of the burglary in Virginia to Hudson County, New Jersey.

- aa. On or about January 31, 2013, defendant DANIEL GATSON and others burglarized a home on White Buck Run in Warren Township, in Somerset County, New Jersey.
- bb. On or about February 5, 2013, defendant DANIEL GATSON and others burglarized a home on Parkwood Lane in Colts Neck Township, in Monmouth County, New Jersey, stealing approximately \$16,000 in jewelry.
- cc. The next day, on or about February 6, 2013, defendant DANIEL GATSON transported stolen jewelry from Hudson County, New Jersey, to New York to be sold for cash.
- dd. Later on or about February 6, 2013, defendant DANIEL GATSON and others burglarized a home on Laurel Way in Harrison, in Westchester County, New York.
- ee. On or about April 9, 2013, defendant DANIEL GATSON and others burglarized a home on Maybelle Court in Mechanicsburg, in Cumberland County, Pennsylvania.
- ff. On or about June 5, 2013, defendant DANIEL GATSON and others burglarized a home on Kendleton Place in Cary, in Wake County, North Carolina, stealing approximately \$35,000 in cash, jewelry, guns, and other property.
- gg. On or about June 7, 2013, defendant DANIEL GATSON transported stolen property from North Carolina to Georgia.

- hh. On or about June 14, 2013, defendant DANIEL GATSON and others burglarized a home on Heards Ferry Road in Atlanta, Georgia, stealing property, including multiple autographed National Basketball Association jerseys.
- ii. On or about September 5, 2013, defendants DANIEL GATSON and ANTHONY HANKS and others burglarized a home on Vanderbilt Drive in Sands Point, in Nassau County, New York, stealing approximately \$480,000 in jewelry and other property.
- jj. Following the burglary, defendant DANIEL GATSON and others transported stolen property from the site of the burglary in New York to Bergen County, New Jersey.
- kk. On or about September 7, 2013, defendant DANIEL GATSON transported stolen property from New Jersey to New York to be sold for cash.
- ll. On or about September 9, 2013, defendant DANIEL GATSON and others attempted to burglarize a home on Chestnut Hill Drive in Upper Brookville, in Nassau County, New York.
- mm. On or about September 19, 2013, defendant DANIEL GATSON and others burglarized a home on Geiger Lane in Warren Township, in Somerset County, New Jersey, stealing approximately \$92,000 in jewelry.

- nn. Also on or about September 19, 2013, defendant DANIEL

  GATSON and others attempted to burglarize a home on Springcroft

  Road in Chester Township, in Morris County, New Jersey.
- oo. The next day, on or about September 20, 2013, defendant

  DANIEL GATSON transported stolen jewelry from Hudson County,

  New Jersey, to New York to be sold for cash.
- pp. Later on or about September 20, 2013, defendants DANIEL

  GATSON and ANTHONY HANKS and others burglarized a home on

  Hickory Drive in Old Brookville, in Nassau County, New York,

  stealing approximately \$77,000 in jewelry.
- qq. Following the burglary, defendant DANIEL GATSON and others transported stolen property from the site of the burglary in New York to New Jersey.
- rr. On or about September 21, 2013, defendant DANIEL GATSON transported stolen jewelry from Hudson County, New Jersey, to New York to be sold for cash.
- ss. On or about September 24, 2013, defendant DANIEL GATSON and others burglarized a home on Barrister Drive in Holmdel Township, in Monmouth County, New Jersey, stealing approximately \$7,000 in jewelry.
- tt. The next day, on or about September 25, 2013, defendant

  DANIEL GATSON transported stolen jewelry from Hudson County,

  New Jersey, to New York to be sold for cash.

- uu. Also on or about September 25, 2013, defendants DANIEL

  GATSON and ANTHONY HANKS and others attempted to

  burglarize a home on Hart Place in Dix Hills, in Suffolk County,

  New York.
- vv. On or about September 26, 2013, defendants DANIEL GATSON and ANTHONY HANKS and others burglarized a home on Charlotte Hill Drive in Bernardsville, in Somerset County, New Jersey, stealing over \$6,000 in jewelry.
- ww. On or about September 27, 2013, defendant DANIEL GATSON transported stolen jewelry from Hudson County, New Jersey, to New York and later to Georgia.
- xx. On or about October 10, 2013, defendant DANIEL GATSON and others burglarized a home on Oakleaf Court in Huntington, in Suffolk County, New York, stealing over \$55,000 in cash and jewelry.
- yy. On or about October 11, 2013, defendant DANIEL GATSONflushed stolen jewelry down a hotel toilet in Uniondale, New York.All in violation of Title 18, United States Code, Section 371.

# COUNT TWO (Interstate Transportation of Stolen Property)

- 1. The allegations contained in paragraphs 2 through 9 of Count One are incorporated by reference as though set forth in full herein.
- 2. On or about December 1, 2012, defendant DANIEL GATSON and others burglarized a home on Hilltop Court in Warren Township, in Somerset County, New Jersey.
- 3. On or about December 3, 2012, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

DANIEL GATSON, a/k/a "Tokyo Gatson," a/k/a "Craig," a/k/a "Big Country,"

did knowingly transport, transmit, and transfer, and cause to be transported, transmitted, and transferred, in interstate commerce goods, wares, merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen and converted.

### COUNT THREE (Interstate Transportation of Stolen Property)

- 1. The allegations contained in paragraphs 2 through 9 of Count One are incorporated by reference as though set forth in full herein.
- 2. On or about December 5, 2012, defendant DANIEL GATSON and others burglarized a home on Lincoln Woods in Harrison, in Westchester County, New York.
- 3. On or about December 5, 2012, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

DANIEL GATSON, a/k/a "Tokyo Gatson," a/k/a "Craig," a/k/a "Big Country,"

did knowingly transport, transmit, and transfer, and cause to be transported, transmitted, and transferred, in interstate commerce goods, wares, merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen and converted.

### COUNT FOUR (Interstate Transportation of Stolen Property)

- 1. The allegations contained in paragraphs 2 through 9 of Count One are incorporated by reference as though set forth in full herein.
- 2. On or about December 10, 2012, defendant DANIEL GATSON and others burglarized a home on Cedar Brook Court in Greenvale, in Nassau County, New York.
- 3. On or about December 10, 2012, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

DANIEL GATSON, a/k/a "Tokyo Gatson," a/k/a "Craig," a/k/a "Big Country,"

did knowingly transport, transmit, and transfer, and cause to be transported, transmitted, and transferred, in interstate commerce goods, wares, merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen and converted.

### COUNT FIVE (Interstate Transportation of Stolen Property)

- 1. The allegations contained in paragraphs 2 through 9 of Count One are incorporated by reference as though set forth in full herein.
- 2. On or about December 28, 2012, defendant DANIEL GATSON and others burglarized a home on Lenape Court in Cranbury Township, in Middlesex County, New Jersey.
- 3. On or about December 28, 2012, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

DANIEL GATSON, a/k/a "Tokyo Gatson," a/k/a "Craig," a/k/a "Big Country,"

did knowingly transport, transmit, and transfer, and cause to be transported, transmitted, and transferred, in interstate commerce goods, wares, merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen and converted.

# COUNT SIX (Interstate Transportation of Stolen Property)

- 1. The allegations contained in paragraphs 2 through 9 of Count One are incorporated by reference as though set forth in full herein.
- 2. On or about January 18, 2013, defendant DANIEL GATSON and others burglarized a home on Mountain Ridge Drive and a home on Lafayette Drive, both in Livingston Township, in Essex County, New Jersey.
- 3. On or about January 19, 2013, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

DANIEL GATSON, a/k/a "Tokyo Gatson," a/k/a "Craig," a/k/a "Big Country,"

did knowingly transport, transmit, and transfer, and cause to be transported, transmitted, and transferred, in interstate commerce goods, wares, merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen and converted.

### COUNT SEVEN (Interstate Transportation of Stolen Property)

- 1. The allegations contained in paragraphs 2 through 9 of Count One are incorporated by reference as though set forth in full herein.
- 2. On or about January 21, 2013, defendant DANIEL GATSON and others burglarized a home on Lasswade Lane in Oakton, in Fairfax County, Virginia.
- 3. On or about January 21 and January 22, 2013, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

DANIEL GATSON, a/k/a "Tokyo Gatson," a/k/a "Craig," a/k/a "Big Country,"

did knowingly transport, transmit, and transfer, and cause to be transported, transmitted, and transferred, in interstate commerce goods, wares, merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen and converted.

### COUNT EIGHT (Interstate Transportation of Stolen Property)

- 1. The allegations contained in paragraphs 2 through 9 of Count One are incorporated by reference as though set forth in full herein.
- 2. On or about February 5, 2013, defendant DANIEL GATSON and others burglarized a home on Parkwood Lane in Colts Neck Township, in Monmouth County, New Jersey.
- 3. On or about February 6, 2013, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

DANIEL GATSON, a/k/a "Tokyo Gatson," a/k/a "Craig," a/k/a "Big Country,"

did knowingly transport, transmit, and transfer, and cause to be transported, transmitted, and transferred, in interstate commerce goods, wares, merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen and converted.

### COUNT NINE (Interstate Transportation of Stolen Property)

- 1. The allegations contained in paragraphs 2 through 9 of Count One are incorporated by reference as though set forth in full herein.
- 2. On or about September 5, 2013, defendants DANIEL GATSON and ANTHONY HANKS and others burglarized a home on Vanderbilt Drive in Sands Point, in Nassau County, New York.
- 3. On or about September 5 and September 6, 2013, in Bergen County, in the District of New Jersey and elsewhere, the defendants,

DANIEL GATSON,
a/k/a "Tokyo Gatson,"
a/k/a "Craig,"
a/k/a "Big Country," and
ANTHONY HANKS,
a/k/a "T.J.,"

did knowingly transport, transmit, and transfer, and cause to be transported, transmitted, and transferred, in interstate commerce goods, wares, merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen and converted.

# COUNT TEN (Interstate Transportation of Stolen Property)

- 1. The allegations contained in paragraphs 2 through 9 of Count One are incorporated by reference as though set forth in full herein.
- 2. On or about September 19, 2013, defendant DANIEL GATSON and others burglarized a home on Geiger Lane in Warren Township, in Somerset County, New Jersey.
- 3. On or about September 20, 2013, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

DANIEL GATSON, a/k/a "Tokyo Gatson," a/k/a "Craig," a/k/a "Big Country,"

did knowingly transport, transmit, and transfer, and cause to be transported, transmitted, and transferred, in interstate commerce goods, wares, merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen and converted.

# COUNT ELEVEN (Interstate Transportation of Stolen Property)

- 1. The allegations contained in paragraphs 2 through 9 of Count One are incorporated by reference as though set forth in full herein.
- 2. On or about September 20, 2013, defendants DANIEL GATSON and ANTHONY HANKS and others burglarized a home on Hickory Drive in Old Brookville, in Nassau County, New York.
- 3. On or about September 20 and 21, 2013, in Hudson County, in the District of New Jersey and elsewhere, the defendants,

DANIEL GATSON,
a/k/a "Tokyo Gatson,"
a/k/a "Craig,"
a/k/a "Big Country," and
ANTHONY HANKS,
a/k/a "T.J.,"

did knowingly transport, transmit, and transfer, and cause to be transported, transmitted, and transferred, in interstate commerce goods, wares, merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen and converted.

# COUNT TWELVE (Interstate Transportation of Stolen Property)

- 1. The allegations contained in paragraphs 2 through 9 of Count One are incorporated by reference as though set forth in full herein.
- 2. On or about September 24, 2013, defendant DANIEL GATSON and others burglarized a home on Barrister Drive in Holmdel Township, in Monmouth County, New Jersey.
- 3. On or about September 25, 2013, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

DANIEL GATSON, a/k/a "Tokyo Gatson," a/k/a "Craig," a/k/a "Big Country,"

did knowingly transport, transmit, and transfer, and cause to be transported, transmitted, and transferred, in interstate commerce goods, wares, merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen and converted.

# COUNT THIRTEEN (Interstate Transportation of Stolen Property)

- 1. The allegations contained in paragraphs 2 through 9 of Count One are incorporated by reference as though set forth in full herein.
- 2. On or about September 26, 2013, defendants DANIEL GATSON and ANTHONY HANKS and others burglarized a home on Charlotte Hill Drive in Bernardsville, in Somerset County, New Jersey.
- 3. On or about September 26 and September 27, 2013, in Hudson County, in the District of New Jersey and elsewhere, the defendants

DANIEL GATSON,
a/k/a "Tokyo Gatson,"
a/k/a "Craig,"
a/k/a "Big Country," and
ANTHONY HANKS,
a/k/a "T.J."

did knowingly transport, transmit, and transfer, and cause to be transported, transmitted, and transferred, in interstate commerce goods, wares, merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen and converted.

### FORFEITURE ALLEGATION

- 1. The allegations contained in this Second Superseding Indictment are hereby incorporated and realleged by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).
- 2. The United States hereby gives notice to the defendants that, upon their conviction of any of the offenses alleged in this Second Superseding Indictment, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the commission of any such offenses.
- 3. If by any act or omission of the defendants any of the property subject to forfeiture described above:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendants up to the value of the above-described forfeitable property.

A TRUE BILL

PAUL J. FISHMAN United States Attorney CASE NUMBER: 13-705

# United States District Court District of New Jersey

UNITED STATES OF AMERICA

Ď.

a/k/a "Tokyo Gatson,"
a/k/a "Craig,"
a/k/a "Big Country," and
ANTHONY HANKS,
a/k/a "T.J."

SECOND SUPERSEDING INDICTMENT FOR

18 U.S.C. Sections 371, 2314,

A True Bill,

PAUL J. FISHMAN UNITED STATES ATTORNEY NEWARK, NEW JERSEY

Josh Hafetz
Assistant U.S. Attorney
973-297-2014