
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Steven C. Mannion
: :
v. : Mag. No. 19-6009
: :
PAUL JIMENEZ, :
JAIME FONTANEZ, and :
VINCENT CHAN-GUILLEN :
: **CRIMINAL COMPLAINT**

I, Michael R. 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 R. Lovett, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
February 19, 2019 at Newark, New Jersey

HONORABLE STEVEN C. MANNION
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Conspiracy to Commit Hobbs Act Robbery)

In or around November 2018, in Union, Middlesex and Essex Counties, in the District of New Jersey and elsewhere, defendants,

PAUL JIMENEZ,
JAIME FONTANEZ, and
VINCENT CHAN-GUILLEN,

did knowingly and willfully conspire to obstruct, delay, and affect, and attempt to obstruct, delay and affect, commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force and violence to the person and property of another, namely, employees and customers of liquor stores located in the District of New Jersey in furtherance thereof.

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

COUNT TWO
(Hobbs Act Robbery)

On or about November 4, 2018, in Union County, in the District of New Jersey and elsewhere, defendants,

PAUL JIMENEZ and
VINCENT CHAN-GUILLEN,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force and violence to the person and property of another, namely, Victim-1, an employee of Liquor Store-1, in furtherance thereof.

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

COUNT THREE
(Hobbs Act Robbery)

On or about November 9, 2018, in Union County, in the District of New Jersey and elsewhere, defendants,

PAUL JIMENEZ and
JAIME FONTANEZ,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force and violence to the person and property of another, namely, Victim-2, an employee of Liquor Store-2, in furtherance thereof.

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

COUNT FOUR
(Hobbs Act Robbery)

On or about November 13, 2018, in Middlesex County, in the District of New Jersey and elsewhere, defendants,

PAUL JIMENEZ,
JAIME FONTANEZ, and
VINCENT CHAN-GUILLEN,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force and violence to the person and property of another, namely, Victim-3, an employee of Liquor Store-3, in furtherance thereof.

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

COUNT FIVE
(Hobbs Act Robbery)

On or about November 13, 2018, in Essex County, in the District of New Jersey and elsewhere, defendants,

PAUL JIMENEZ,
JAIME FONTANEZ, and
VINCENT CHAN-GUILLEN,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force and violence to the person and property of another, namely, Victim-4, an employee of Liquor Store-4, in furtherance thereof.

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

COUNT SIX
(Hobbs Act Robbery)

On or about November 27, 2018, in Union County, in the District of New Jersey and elsewhere, defendants,

PAUL JIMENEZ,
JAIME FONTANEZ, and
VINCENT CHAN-GUILLEN,

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten force and violence to the person and property of another, namely, Victim-5, an employee of Liquor Store-5, in furtherance thereof.

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

COUNT SEVEN
**(Using and Carrying a Firearm During and in Relation to a
Crime of Violence)**

In or around November 2018, in Union, Middlesex and Essex Counties, in the District of New Jersey and elsewhere, defendants,

PAUL JIMENEZ,
JAIME FONTANEZ, and
VINCENT CHAN-GUILLEN,

during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, namely Conspiracy to Commit Hobbs Act Robbery charged in Count One of this Complaint, did knowingly use and carry a firearm, which was brandished and discharged, and did aid and abet the same.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.

ATTACHMENT B

I, Michael R. 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. On or about November 4, 2018, at approximately 11:30 p.m., PAUL JIMENEZ ("JIMENEZ") and VINCENT CHAN-GUILLEN ("CHAN-GUILLEN") entered Liquor Store-1 in Elizabeth, New Jersey with their faces covered. JIMENEZ was wearing light-colored jeans with large front pockets, a black sweatshirt, and black Nike sneakers with a white Nike "swoosh" on the toe-area. CHAN-GUILLEN was wearing a black jacket, jeans, gloves, and two-toned sneakers. CHAN-GUILLEN stood by the counter brandishing a handgun and pointing it at Victim-1, an employee of Liquor Store-1, and a waiting customer. JIMENEZ proceeded to the cash register, put on gloves, and demanded that Victim-1 open the cash register. JIMENEZ then took all the money from the cash register, approximately \$4,000 in U.S. currency, and three cell phones. JIMENEZ and CHAN-GUILLEN then fled Liquor Store-1. The incident was captured on Liquor Store-1's security system.

2. On or about November 9, 2018, at approximately 9:00 p.m., JIMENEZ and JAIME FONTANEZ ("FONTANEZ") entered Liquor Store-2 in Rahway, New Jersey with their faces covered. JIMENEZ was wearing a dark jacket or sweatshirt, dark jeans, gloves, and the same black Nike sneakers from the robbery of Liquor Store-1 with the white Nike "swoosh" on the toe-area. FONTANEZ was wearing a black jacket with a hood, a baseball hat, jeans, black gloves, and bright blue New Balance sneakers with a white "N" on the sides. FONTANEZ walked up to Victim-2, an employee of Liquor Store-2, and another individual, brandished a handgun, and ordered them to get on the ground. JIMENEZ then proceeded to the cash register and removed all the money from the register, as well as additional money that was in a box below the cash register, totaling approximately \$8,400 in U.S. currency. JIMENEZ and FONTANEZ then fled Liquor Store-2. The incident was captured on Liquor Store-2's security system.

3. On or about November 13, 2018, at approximately 8:40 p.m., JIMENEZ and CHAN-GUILLEN entered Liquor Store-3 in Woodbridge, New Jersey with their faces covered. CHAN-GUILLEN was wearing a black jacket with a hood and gloves. JIMENEZ was wearing a black hooded sweatshirt with white writing on his left sleeve and white drawstrings tied under his chin. Both

JIMENEZ and CHAN-GUILLEN proceeded to the two cash registers, opened them and removed all the money from therein, approximately \$800 in U.S. currency. CHAN-GUILLEN brandished a firearm and pointed it at Victim-3, an employee of Liquor Store-3. CHAN-GUILLEN and JIMENEZ then fled Liquor Store-3. The incident was captured on Liquor Store-3's security system.

4. JIMENEZ, FONTANEZ and CHAN-GUILLEN proceeded to Bloomfield, New Jersey. At approximately 9:32 p.m., JIMENEZ and CHAN-GUILLEN entered Liquor Store-4 in Bloomfield, New Jersey with their faces covered. JIMENEZ was wearing the same black hooded sweatshirt from the preceding robbery with white drawstrings and "CALVIN KLEIN" written in white letters on his left sleeve, the same Nike sneakers with the white Nike "swoosh" near the toe area from prior robberies, gloves, and jeans. CHAN-GUILLEN was wearing a black jacket with a hood and a small decal on the breast, blue jeans, gloves, and light colored Nike sneakers with blue distinct stripes. CHAN-GUILLEN brandished a firearm and pointed it at Victim-4, an employee of Liquor Store-4, and others, while JIMENEZ proceeded behind the counter to the cash register. After pushing Victim-4 aside, JIMENEZ was unable to open the cash register. JIMENEZ and CHAN-GUILLEN fled Liquor Store-4 while being pursued by other victims. CHAN-GUILLEN discharged the firearm where the projectile entered Liquor Store-4 and lodged into an ice freezer. The projectile and shell casing were subsequently recovered from the scene. JIMENEZ and CHAN-GUILLEN entered a waiting Honda Civic driven by FONTANEZ and the Honda Civic drove away. The incident was captured on Liquor Store-4's security system.

5. On or about November 27, 2018, at approximately 9:45 p.m., JIMENEZ and CHAN-GUILLEN entered Liquor Store-5 in Linden, New Jersey, with their faces covered. JIMENEZ was wearing the same light-colored jeans with large front pockets from the Elizabeth robbery, a black jacket with a hood, a black baseball cap, brown boots and gloves. CHAN-GUILLEN was wearing the same black jacket with a hood and small decal on the breast from the Bloomfield robbery, gloves, jeans and the same light-colored Nike sneakers with blue distinct stripes from the Bloomfield robbery. CHAN-GUILLEN proceeded to the front of the counter and pointed a handgun at Victim-5 and Victim-6, employees of Liquor Store-5, while JIMENEZ walked behind the counter to the cash registers. JIMENEZ then opened all three cash registers and removed approximately \$5,000 in U.S. currency. JIMENEZ and CHAN-GUILLEN then fled Liquor Store-5 and entered the Honda Civic driven by FONTANEZ, the same vehicle from the preceding robbery. The incident was captured on Liquor Store-5's security system.

6. The robberies share a number of characteristics:
 - a. The robberies all involved liquor stores;

- b. As depicted in the surveillance footage, the individual identified by law enforcement as CHAN-GUILLEN wore the same sneakers and black jacket in several of the robberies;
- c. As depicted in the surveillance footage, the individual identified by law enforcement as JIMENEZ wore the same Nike sneakers and jeans in several of the robberies;
- d. The Honda Civic driven by FONTANEZ was observed in the vicinity of the Bloomfield and Linden robberies and 2 individuals can be seen running to the vehicle and entering the vehicle as it drives away;
- e. The subsequent review of the EZ-Pass account records associated with the Honda Civic also places the vehicle's EZ-Pass transponder in the vicinity of the Woodbridge and Bloomfield robberies contemporaneous to the robberies; and
- f. The EZ-Pass account associated with the Honda Civic is in FONTANEZ's name.

7. On or about November 30, 2018, following a motor vehicle stop in Lyndhurst, New Jersey, and a subsequent search of his vehicle, CHAN-GUILLEN was found to be in possession of a firearm, a Charles Daly .45 caliber handgun, along with the black hooded jacket with the decal on the breast he was wearing in several of the robberies. Ballistics testing confirmed that the firearm recovered from CHAN-GUILLEN's vehicle on or about November 30, 2018 in Lyndhurst, New Jersey, expelled the shell casing recovered from the robbery of Liquor Store-4 in Bloomfield, New Jersey, on or about November 13, 2018. Based on the surveillance videos from the robberies, that same firearm is used in all of the robberies.

8. Based on law enforcement's investigation, cellular telephones were associated with FONTANEZ ("Cell Phone-1") and JIMENEZ ("Cell Phone-2") at the time of the robberies. A review of cell phone records revealed that Cell Phone-1 was located in the general vicinity of at least three of the robberies at the time they occurred: the November 9, 2018 robbery in Rahway; and the November 13, 2018 robberies in Woodbridge and Bloomfield. Cell Phone-2 was located in the general vicinity of at least four of the robberies at the time they occurred: the November 9, 2018 robbery in Rahway; the November 13, 2018 robberies in Woodbridge and Bloomfield; and the November 27, 2018 robbery in Linden.

9. Each of the targeted liquor stores purchase, sell and/or repurpose good manufactured outside of the State of New Jersey, and therefore engage in interstate commerce.