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(Conspiracy to Commit Mail and Wire Fraud)

The Jewelry Fraud Scheme

1. From at least in or about June 2015 to in or about June 2016, DAVID JENKINS, a/k/a "Paul Gilbert," a/k/a "Theodore Laquinta," a/k/a "Paul David," ANTHONY BROOKS, LAKEATHA COOPER, SHARON LARA, a/k/a "Pepper," DOMINEK GRANT, and ROBERTO CONCEPCION, the defendants, and others known and unknown (collectively, the "Imposters"), defrauded jewelry merchants in New York, New York and elsewhere inducing the merchants to send gemstones, precious metals, and jewelry to the Imposters in

exchange for counterfeit checks or other fictitious payment (the "Jewelry Fraud").

2. The Imposters contacted jewelry and antiques merchants by telephone, electronic message, and email. In many of these communications, DAVID JENKINS, a/k/a "Paul Gilbert," a/k/a "Theodore Laquinta," a/k/a "Paul David," the defendant, masqueraded as various representatives of legitimate jewelry companies and, in doing so, often appropriated the name and personal identifying information of real persons. For example, using the names of "Paul Gilbert," "Theodore Laquinta," "Paul David," and others, JENKINS ordered jewelry and precious goods from merchants in one state, usually New York, and instructed those merchants to ship their goods to one of the Imposters in a different state, usually Florida.

3. In the typical scenario, DAVID JENKINS, a/k/a "Paul Gilbert," a/k/a "Theodore Laquinta," a/k/a "Paul David," the defendant, negotiated cash-on-delivery terms of payment from merchants. Cash-on-delivery terms meant that a delivery carrier would release a merchant's goods to the Imposters once the carrier took possession of what appeared to be a certified check. By negotiating cash-on-delivery terms, JENKINS ensured both that merchants would not meet any of the Imposters in person and that the Imposters would not have to pay for the goods by wire transfer.

4. The Imposters also insisted on payment by check because the Imposters' checks were counterfeit and fictitious. The Imposters typically used real bank account routing information on the counterfeit checks to cause merchants' banks to preliminarily accept the Imposters' checks. The merchants' banks, however, typically discovered the subterfuge within a matter of days and returned the Imposters' checks to the merchants as counterfeit. By then, merchants who had sent goods had parted with them for no consideration.

5. After receiving the merchants' goods, the Imposters turned those goods into profit. For example, certain of the Imposters personally sold goods to jewelry stores and received payment in exchange for fraudulently obtained jewelry. Certain of the Imposters also sent goods to an individual in a different state who would sell the merchants' goods and, using wire transfers, remit the proceeds back to the Imposters, including DAVID JENKINS, a/k/a "Paul Gilbert," a/k/a "Theodore Laquinta," a/k/a "Paul David."

6. Contrary to the representations made to the merchants, DAVID JENKINS, a/k/a "Paul Gilbert," a/k/a "Theodore Laquinta," a/k/a "Paul David," never represented a legitimate jewelry business. In truth and in fact, at all relevant times to this Indictment, JENKINS was incarcerated at a Florida state correctional institution. In perpetrating the Jewelry Fraud, JENKINS was assisted from within prison by ROBERTO CONCEPCION,

the defendant, who was also incarcerated at the same Florida State correctional institution. ANTHONY BROOKS, LAKEATHA COOPER, SHARON LARA, a/k/a "Pepper," and DOMINEK GRANT, the defendants, who at all relevant times to this Indictment were at liberty in the community, contributed to the Jewelry Fraud by creating and delivering counterfeit checks, by accepting packages from merchants, and by distributing proceeds from the Jewelry Fraud to others in the scheme.

Statutory Allegations

7. From in or about June 2015, up to and including in or about June 2016, in the Southern District of New York and elsewhere, DAVID JENKINS, a/k/a "Paul Gilbert," a/k/a "Theodore Laquinta," a/k/a "Paul David," ANTHONY BROOKS, LAKEATHA COOPER, SHARON LARA, a/k/a "Pepper," DOMINEK GRANT, and ROBERTO CONCEPCION, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together to commit mail fraud in violation of Title 18, United States Code, Section 1341 and wire fraud in violation of Title 18, United States Code, Section 1343.

8. It was a part and object of the conspiracy that DAVID JENKINS, a/k/a "Paul Gilbert," a/k/a "Theodore Laquinta," a/k/a "Paul David," ANTHONY BROOKS, LAKEATHA COOPER, SHARON LARA, a/k/a "Pepper," DOMINEK GRANT, and ROBERTO CONCEPCION, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and

artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to do, would and did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and would and did take and receive there from, such matters and things, and would and did cause to be delivered by mail and such carriers according to the directions thereon, and at the places at which they were directed to be delivered by the person to whom they were addressed, such matters and things, in violation of Title 18, United States Code, Section 1341.

9. It was a further part and object of the conspiracy that DAVID JENKINS, a/k/a "Paul Gilbert," a/k/a "Theodore Laquinta," a/k/a "Paul David," ANTHONY BROOKS, LAKEATHA COOPER, SHARON LARA, a/k/a "Pepper," DOMINEK GRANT, and ROBERTO CONCEPCION, the defendants, and others known and unknown, willfully and knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, writings, signs, signals,

pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Interstate Transportation of Stolen Property)

The Grand Jury further charges:

10. From in or about June 2015, up to and including in or about June 2016, in the Southern District of New York and elsewhere, DAVID JENKINS, a/k/a "Paul Gilbert," a/k/a "Theodore Laquinta," a/k/a "Paul David," ANTHONY BROOKS, LAKEATHA COOPER, SHARON LARA, a/k/a "Pepper," DOMINEK GRANT, and ROBERTO CONCEPCION, the defendants, and others known and unknown, willfully and knowingly, would and did transport, transmit, and transfer in interstate commerce goods and merchandise of the value of \$5,000 and more, knowing the same to have been stolen, to wit, JENKINS, BROOKS, COOPER, LARA, GRANT, and CONCEPCION, the defendants, and others known and unknown, transported and mailed packages containing jewelry and precious metals obtained by fraud, and aided and abetted the same.

(Title 18, United States Code, Sections 2314 and 2.)

COUNT THREE

(Fictitious Obligations)

The Grand Jury further charges:

11. From in or about June 2015, up to and including in or about June 2016, in the Southern District of New York and elsewhere, DAVID JENKINS, a/k/a "Paul Gilbert," a/k/a "Theodore Laquinta," a/k/a "Paul David," ANTHONY BROOKS, LAKEATHA COOPER, SHARON LARA, a/k/a "Pepper," DOMINEK GRANT, and ROBERTO CONCEPCION, the defendants, and others known and unknown, knowingly, and with the intent to defraud, would and did utilize interstate and foreign commerce, including the use of the mails and wire, radio, and other electronic communication, to transmit, transport, ship, move, transfer, and attempt and cause the same, to, from, and through the United States, a false and fictitious instrument, document, and other item appearing, representing, purporting, and contriving through scheme or artifice, to be an actual security or other financial instrument issued under the authority of an organization, to wit, JENKINS, BROOKS, COOPER, LARA, GRANT, and CONCEPCION, the defendants, and others known and unknown, transmitted fraudulent checks in the names of legitimate companies and businesses to jewelry merchants across the United States in order to induce them to part with valuable merchandise, and aided and abetted the same.

(Title 18, United States Code, Sections 514 and 2.)

COUNT FOUR

(Aggravated Identity Theft)

The Grand Jury further charges:

12. From in or about June 2015, up to and including in or about June 2016, in the Southern District of New York and elsewhere, DAVID JENKINS, a/k/a "Paul Gilbert," a/k/a "Theodore Laquinta," a/k/a "Paul David," the defendant, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, JENKINS possessed, used, and transferred the personal identification information of legitimate jewelers in order to induce jewelry merchants to part with valuable merchandise in connection with his participation in the conspiracy charged in Count One of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1) and
1028A(b).)

FORFEITURE ALLEGATIONS

13. As a result of committing the offenses alleged in Counts One and Two of this Indictment, DAVID JENKINS, a/k/a "Paul Gilbert," a/k/a "Theodore Laquinta," a/k/a "Paul David," ANTHONY BROOKS, LAKEATHA COOPER, SHARON LARA, a/k/a "Pepper," DOMINEK GRANT, and ROBERTO CONCEPCION, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of one or more of the offenses alleged in Counts One and Two of this Indictment.

14. As a result of committing the offenses alleged in Count Three of this Indictment, DAVID JENKINS a/k/a "Paul Gilbert," a/k/a "Theodore Laquinta," a/k/a "Paul David," ANTHONY BROOKS, LAKEATHA COOPER, SHARON LARA, a/k/a "Pepper," DOMINEK GRANT, and ROBERTO CONCEPCION, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 492 and Title 28, United States Code, Section 2461, all counterfeits of any coins or obligations or other securities of the United States or of any foreign government, and any articles, devices, or other things made, possessed, or used in the commission of the offense alleged in Count Three of this Indictment, and any material or apparatus used or fitted or intended to be used, in the making of such counterfeits, articles, devices or things.

15. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

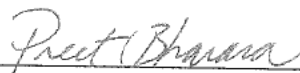
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value;
- or

e. has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853, to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981, Title 28, United States Code, Section 2461, and Title 21, United States Code, Section 853.)



FOREPERSON


PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

DAVID JENKINS,
a/k/a "Paul Gilbert,"
a/k/a "Theodore Laquinta,"
a/k/a "Paul David,"
ANTHONY BROOKS,
LAKEATHA COOPER,
SHARON LARA,
a/k/a "Pepper,"
DOMINEK GRANT, and
ROBERTO CONCEPCION,

Defendants.

INDICTMENT

16 Cr.

(18 U.S.C. §§ 1349, 514,
2314, 1028A, 2.)

PREET BHARARA

United States Attorney.


Foreperson.
