

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : SEALED SUPERSEDING  
: INDICTMENT  
- v. - :  
: S2 20 Cr. 600 (AKH)  
VICTOR RIVERA and :  
JOHAN ARAUJO, :  
:   
: Defendants. :  
:   
----- X

**COUNT ONE**  
**(Hobbs Act Robbery Conspiracy)**

The Grand Jury charges:

1. From at least in or about October 2019 up to and including November 2020, in the Southern District of New York and elsewhere, VICTOR RIVERA and JOHAN ARAUJO, the defendants, and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, RIVERA and ARAUJO agreed to commit robberies in which the objects of the robberies were luxury watches, and the watches were owned by businesses transacting in interstate commerce.

OVERT ACTS

2. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 3, 2019, VICTOR RIVERA, the defendant, and a co-conspirator not named herein participated in a robbery of a jeweler in the vicinity of Long Island City, New York, which resulted in the theft of, among other things, a *Richard Mille* watch valued at over \$250,000.

b. On or about October 25, 2019, RIVERA and a co-conspirator not named herein participated in a robbery of a jeweler in the vicinity of Jamaica, New York, which resulted in the theft of, among other things, a *Rolex* watch valued at over \$150,000.

c. On or about December 10, 2019, RIVERA and JOHAN ARAUJO, the defendant, and a co-conspirator not named herein participated in a robbery of a jeweler in the vicinity of Brooklyn, New York, which resulted in the theft of, among other things, a *Patek Philippe* watch valued at over \$160,000 and a diamond necklace valued at over \$77,000.

d. On or about January 14, 2020, RIVERA and a co-conspirator not named herein participated in the robbery of a jeweler in the vicinity of Rego Park, New York, which resulted in the theft of, among other things, a *Richard Mille* watch valued at over \$500,000.

e. On or about February 16, 2020, RIVERA and ARAUJO participated in the robbery of a jeweler in the vicinity of Jamaica Estates, New York, which resulted in the theft of, among other things, an *Audemars Piguet* watch valued at over \$28,000.

f. On or about February 20, 2020, RIVERA and a co-conspirator not named herein participated in a robbery of an individual in the vicinity of Long Island City, New York, which resulted in the theft of, among other things, an *Audemars Piguet* watch valued at over \$125,000.

g. On or about June 11, 2020, RIVERA and ARAUJO participated in the robbery of a jeweler in the vicinity of Brooklyn, New York, which resulted in the theft of, among other things, a *Richard Mille* watch valued at over \$148,000.

h. On or about July 6, 2020, RIVERA and a co-conspirator not named herein participated in the robbery of a jeweler in the vicinity of Hoboken, New Jersey, which resulted

in the theft of, among other things, a *Richard Mille* watch valued at over \$81,000.

i. On or about July 20, 2020, RIVERA and a co-conspirator not named herein participated in the attempted robbery of a jeweler in the vicinity of Queens, New York, attempting to steal a *Richard Mille* watch valued at over \$180,000.

j. On or about August 2, 2020, RIVERA and a co-conspirator not named herein participated in the robbery of an individual in the vicinity of Englewood Cliffs, New Jersey, which resulted in the theft of, among other things, a *Richard Mille* watch valued at over \$250,000.

k. On or about October 27, 2020, RIVERA and another co-conspirator not named herein participated in the robbery of a jeweler in the vicinity of Woodbury, New York, which resulted in the theft of, among other things, an Audemars Piguet watch valued at over \$26,000 and assorted jewels and gold links valued at over \$60,000.

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

**COUNT TWO**  
**(Money Laundering Conspiracy)**

The Grand Jury further charges:

3. From at least in or about October 2019 up to and including at least in or about November 2020, in the Southern District of New York and elsewhere, VICTOR RIVERA, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to: (1) commit money laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), and (2) engage in monetary transactions in property derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

4. It was a part and an object of the conspiracy that VICTOR RIVERA, the defendant, and others known and unknown, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, Hobbs Act robberies in violation of Title 18, United States Code, Section 1951, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the

ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a) (1) (B) (i).

5. It was further a part and an object of the conspiracy that VICTOR RIVERA, the defendant, and others known and unknown, knowingly would and did engage and attempt to engage in monetary transactions in criminally derived property of a value greater than \$10,000 that was derived from specified unlawful activity, to wit, Hobbs Act robberies in violation of Title 18, United States Code, Section 1951, in violation of Title 18, United States Code, Section 1957.

(Title 18, United States Code, Section 1956(h).)

**COUNT THREE**  
**(Hobbs Act Robbery)**

The Grand Jury further charges:

6. On or about October 3, 2019, in the Southern District of New York and elsewhere, VICTOR RIVERA, the defendant, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b) (1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b) (3), and aided and abetted the same, to

wit, RIVERA and others robbed a victim of a *Richard Mille* watch owned by the victim's business.

(Title 18, United States Code, Sections 1951 and 2.)

**COUNT FOUR**  
**(Hobbs Act Robbery)**

The Grand Jury further charges:

7. On or about October 25, 2019, in the Southern District of New York and elsewhere, VICTOR RIVERA, the defendant, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, RIVERA and others robbed a victim of a *Rolex* watch owned by the victim's business.

(Title 18, United States Code, Sections 1951 and 2.)

**COUNT FIVE**  
**(Hobbs Act Robbery)**

The Grand Jury further charges:

8. On or about December 10, 2019, in the Southern District of New York and elsewhere, VICTOR RIVERA and JOHAN ARAUJO, the defendants, and others known and unknown, knowingly

did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, RIVERA, ARAUJO, and others robbed a victim of a *Patek Phillipe* watch and a diamond necklace owned by the victim's business.

(Title 18, United States Code, Sections 1951 and 2.)

**COUNT SIX**  
**(Firearms)**

The Grand Jury further charges:

9. On or about December 10, 2019, in the Southern District of New York and elsewhere, VICTOR RIVERA, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Five of this Indictment, knowingly did use and carry a firearm, and in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and 2.)



**COUNT SEVEN**  
**(Hobbs Act Robbery)**

The Grand Jury further charges:

10. On or about January 14, 2020, in the Southern District of New York and elsewhere, VICTOR RIVERA, the defendant, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, RIVERA and others robbed a victim of a *Richard Mille* watch owned by the victim's business.

(Title 18, United States Code, Sections 1951 and 2.)

**COUNT EIGHT**  
**(Hobbs Act Robbery)**

The Grand Jury further charges:

11. On or about February 16, 2020, in the Southern District of New York and elsewhere, VICTOR RIVERA and JOHAN ARAUJO, the defendants, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and

commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, RIVERA, ARAUJO, and others robbed a victim of a *Richard Mille* watch owned by the victim's business.

(Title 18, United States Code, Sections 1951 and 2.)

**COUNT NINE**  
**(Hobbs Act Robbery)**

The Grand Jury further charges:

12. On or about June 11, 2020, in the Southern District of New York and elsewhere, VICTOR RIVERA and JOHAN ARAUJO, the defendants, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, RIVERA, ARAUJO, and others robbed a victim of a *Richard Mille* watch owned by the victim's business.

(Title 18, United States Code, Sections 1951 and 2.)

**COUNT TEN**  
**(Firearms)**

The Grand Jury further charges:

13. On or about June 11, 2020, in the Southern District of New York and elsewhere, VICTOR RIVERA, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Nine of this Indictment, knowingly did use and carry a firearm, and in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii),  
(iii), and 2.)

**COUNT ELEVEN**  
**(Attempted Hobbs Act Robbery)**

The Grand Jury further charges:

14. On or about July 6, 2020, in the Southern District of New York and elsewhere, VICTOR RIVERA, the defendant, and others known and unknown, knowingly did attempt to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of

articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, RIVERA and others robbed a victim of a *Richard Mille* watch.

(Title 18, United States Code, Sections 1951 and 2.)

**COUNT TWELVE**  
**(Interstate Transportation of Stolen Property)**

The Grand Jury further charges:

15. On or about July 6, 2020, in the Southern District of New York and elsewhere, VICTOR RIVERA, the defendant, and others known and unknown, willfully and knowingly transported, transmitted, and transferred in interstate and foreign commerce goods, wares, merchandise, securities and money, of the value of \$5,000 and more, knowing the same to have been stolen, converted and taken by fraud, to wit, RIVERA and others transported, and aided and abetted the transportation of, a stolen *Richard Mille* watch from New Jersey to New York.

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

**COUNT THIRTEEN**  
**(Attempted Hobbs Act Robbery and Extortion)**

The Grand Jury further charges:

16. In or around July 2020, in the Southern District of New York and elsewhere, VICTOR RIVERA, the defendant, and

others known and unknown, knowingly did attempt to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and knowingly did attempt to commit extortion, as that term is defined in Title 18, United States Code, Section 1951(b)(2), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, RIVERA and others attempted to rob and extort a victim of a *Richard Mille* watch, which was owned by the victim's business.

(Title 18, United States Code, Sections 1951 and 2.)

**COUNT FOURTEEN**  
**(Hobbs Act Robbery)**

The Grand Jury further charges:

17. On or about August 2, 2020, in the Southern District of New York and elsewhere, VICTOR RIVERA, the defendant, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to

wit, RIVERA and others robbed a victim of a *Richard Mille* watch owned by the victim's business.

(Title 18, United States Code, Sections 1951 and 2.)

**COUNT FIFTEEN**  
**(Firearms)**

The Grand Jury further charges:

18. On or about August 2, 2020, in the Southern District of New York and elsewhere, VICTOR RIVERA, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the robbery charged in Count Fourteen of this Indictment, knowingly did use and carry a firearm, and in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and 2.)

**COUNT SIXTEEN**  
**(Interstate Transportation of Stolen Property)**

The Grand Jury further charges:

19. On or about August 2, 2020, in the Southern District of New York and elsewhere, VICTOR RIVERA, the defendant, and others known and unknown, willfully and knowingly transported, transmitted, and transferred in interstate and

foreign commerce goods, wares, merchandise, securities and money, of the value of \$5,000 and more, knowing the same to have been stolen, converted and taken by fraud, to wit, RIVERA and others transported, and aided and abetted the transportation of, a stolen *Richard Mille* watch from New Jersey to New York.

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

**COUNT SEVENTEEN**  
**(Hobbs Act Robbery)**

The Grand Jury further charges:

20. On or about October 27, 2020, in the Southern District of New York and elsewhere, VICTOR RIVERA, the defendant, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, RIVERA and others robbed a victim of a *Audemars Piguet* watch and assorted jewels and gold links owned by the victim's business.

(Title 18, United States Code, Sections 1951 and 2.)

**COUNT EIGHTEEN**  
**(Firearms)**

The Grand Jury further charges:

21. On or about October 27, 2020, in the Southern District of New York and elsewhere, VICTOR RIVERA, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Seventeen of this Indictment, knowingly did use and carry a firearm, and in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii),  
and 2.)

**FORFEITURE ALLEGATIONS**

22. As a result of committing the offenses alleged in Counts One, Three, Four, Five, Seven, Eight, Nine, Eleven, Twelve, Thirteen, Fourteen, Sixteen, and Seventeen of this Indictment, VICTOR RIVERA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said



offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

23. As a result of committing the offense alleged in Count Two of this Indictment, VICTOR RIVERA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

24. As a result of committing the offenses alleged in Counts One, Five, Eight, and Nine of this Indictment, JOHAN ARAUJO, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

Substitute Assets Provision


25. 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 Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
FOREPERSON  


  
AUDREY STRAUSS  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

VICTOR RIVERA and  
JOHAN ARAUJO,

Defendants.

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SEALED SUPERSEDING INDICTMENT

S2 20 Cr. 600 (AKH)

(18 U.S.C. §§ 1951, 1956, 2314, 924(c),  
and 2.)

AUDREY STRAUSS  
United States Attorney.

  
Foreperson

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