

UNITED STATES OF AMERICA

“Pablo Daniel Valdes Chaparro”

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Filed Under Seal

Cathy L. Waldor (TAC)
Hon. Cathy L. Waldor
United States Magistrate Judge

ATTACHMENT A

Count One

(Conspiracy to Sell and Receive Stolen Property)

Between on or about November 15, 2024 and on or about November 19, 2024,
in the District of New Jersey, and elsewhere, defendants,

**CHRISTOFER SANGUESA AGUIRRE,
a/k/a “Agustin Perez Gonzalez,”
FABIANA PRADO SCATARZI,
SANTANA ARTURO CASTILLO GONZALEZ,
FELIPE ANDRES DEL VALLE MUNOZ,
a/k/a “Marco Abruzzi,”
CARLOS ALFREDO CALDERON VALENCIA,
a/k/a “Miguel Angel Arroyo Gonzalez,”
DIEGO ANTONIO CALDERON LEIVA,
a/k/a “Ronaldo Efrain Leon Mercado,”
PEDRO ALEJANDRO SALGADO VALLEJOS,
a/k/a “Joan Gabriel Puga Miranda,” and “Pablo Daniel Valdes Chaparro,”**

knowingly and intentionally conspired with others to receive, possess, conceal, store, barter, sell, and dispose of any goods, wares, merchandise, securities, and money, of the value of \$5,000 or more, which had crossed a State or United States boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, contrary to Title 18, United States Code, Section 2315.

In violation of Title 18, United States Code, Section 371.

Count Two
(Receipt of Stolen Property)

On or about November 19, 2024, in the District of New Jersey, and elsewhere,
defendants,

**CHRISTOFER SANGUESA AGUIRRE,
a/k/a “Agustin Perez Gonzalez,”
FABIANA PRADO SCATARZI,
SANTANA ARTURO CASTILLO GONZALEZ,
FELIPE ANDRES DEL VALLE MUNOZ,
a/k/a “Marco Abruzzi,”
CARLOS ALFREDO CALDERON VALENCIA,
a/k/a “Miguel Angel Arroyo Gonzalez,”
DIEGO ANTONIO CALDERON LEIVA,
a/k/a “Ronaldo Efrain Leon Mercado,”
PEDRO ALEJANDRO SALGADO VALLEJOS,
a/k/a “Joan Gabriel Puga Miranda,” and “Pablo Daniel Valdes Chaparro,”**

knowingly and intentionally received, possessed, concealed, stored, bartered, sold, and disposed of goods, wares, merchandise, securities, and money, of the value of \$5,000 or more, which had crossed a State or United States boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken.

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

ATTACHMENT B

I, Jimena Noonan, 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 other law enforcement officers, and my review of reports, documents, recorded communications, and photographs of the evidence. Where statements of others are related herein, they are related in substance and 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 15, 2024, Colts Neck, New Jersey Police Department officers responded to a residence in Colts Neck, New Jersey (the “Colts Neck Residence”) because of a reported burglary. The owners of the Colts Neck Residence stated to law enforcement officers, in substance and in part, that a burglary alarm had been activated at approximately 8:41 p.m. that day. Colts Neck Police Department officers saw that a rear window of the Colts Neck Residence had been broken and the interior rooms had been ransacked.

2. The owners of the Colts Neck Residence told law enforcement officers that multiple valuables were missing after the burglary, including several high-value wristwatches.

3. Law enforcement officers lawfully obtained global-positioning-system (“GPS”) records for a sports utility vehicle that had been rented from a rental car company in Fort Lee, New Jersey on or about November 15, 2024 (the “Rental SUV”). Law enforcement learned that the Rental SUV had been rented to an individual providing a Peruvian passport with the name Ronaldo Efrain Leon Mercado.

4. The GPS records for the Rental SUV showed that it was in the vicinity of the Colts Neck Residence on or about November 15, 2024, around the time when the burglary of the Colts Neck Residence is suspected to have occurred.

5. On or about November 15, 2024, after the burglary of the Colts Neck Residence is suspected to have occurred, the Rental SUV drove to Keansburg, New Jersey and parked in front of a home offered for short-term vacation rentals (the “Keansburg Rental Property”). A security camera near the front door of the Keansburg Rental Property recorded the following individuals get out of the Rental SUV and other vehicles and enter the Keansburg Rental Property: Fabiana Prado Scatarzi (“PRADO SCATARZI”), Santana Arturo Castillo Gonzalez (“CASTILLO GONZALEZ”), Felipe Andres Del Valle Munoz (“DEL VALLE”), Carlos Alfredo Calderon Valencia (“CALDERON VALENCIA”), and Diego Antonio Calderon Leiva (“CALDERON LEIVA”). Later at night on or about November 15, 2024, the security camera recorded Christofer Sanguesa Aguirre (“SANGUESA AGUIRRE”) entering

the Keansburg Rental Property. Prior to the burglary of the Colts Neck Residence, CALDERON LEIVA was recorded carrying a device for covering a vehicle's license plate under his arm.

6. On or about November 16, 2024, shortly after midnight, the Rental SUV drove from the Keansburg Rental Property to the area of Astoria in or around Queens, New York, before returning to the Keansburg Rental Home at approximately 6:42 a.m.

7. On or about November 17, 2024, at approximately 11:36 a.m., a security camera recorded CALDERON LEIVA purchasing marijuana at a dispensary in Belmont, Massachusetts. Transaction records from the dispensary show that CALDERON LEIVA used identification under the name Ronaldo Efrain Leon Mercado.

8. On or about November 17, 2024, at approximately 10:03 p.m., Westwood, Massachusetts Police Department officers responded to a report of a suspected burglary at a residence in Westwood, Massachusetts (the "Westwood Residence"). Upon entering the Westwood Residence with its owner, the police officers found that it had been ransacked and that several high-value wristwatches and expensive pieces of jewelry stored in a dresser were missing.

9. Before law enforcement officers responded to the burglary, the GPS records for the Rental SUV showed that it was immediately across the street from the Westwood Residence between approximately 6:27 p.m. and approximately 7:23 p.m.

10. On or about November 18, 2024, at approximately 12:16 p.m., the Rental SUV stopped in a gas station in Brighton, Massachusetts. Security cameras at the gas station recorded CALDERON VALENCIA walking into the gas station and making a transaction with the cashier before getting back into the Rental SUV.

11. On or about November 18, 2024, at approximately 4:00 p.m., SANGUESA AGUIRRE, CASTILLO GONZALEZ, DEL VALLE, and Pedro Alejandro Salgado Vallejos ("SALGADO VALLEJOS") were recorded by a security camera at a retail clothing store in Watertown, Massachusetts purchasing shoes. DEL VALLE purchased distinctive white sneakers with gold or tan trim.

12. On or about November 18, 2024, at approximately 6:18 p.m., Wellesley, Massachusetts Police Department officers responded to a residential burglary alarm at a residence (the "Wellesley Residence"). Officers saw SALGADO VALLEJOS fleeing from the Wellesley Residence. The police officers pursued SALGADO VALLEJOS and apprehended him. At the time he was apprehended, SALGADO VALLEJOS was wearing the same distinctive sports team jersey that he was wearing when recorded at the retail clothing store in Watertown.

13. On or about November 18, 2024, at approximately 6:33 p.m., law enforcement officers lawfully stopped a white minivan (the “White Minivan”) near the Wellesley Residence. CALDERON LEIVA was driving the White Minivan and provided law enforcement officers with a Peruvian driver’s license in the name of Ronaldo Efrain Leon Mercado and bearing CALDERON LEIVA’s photograph. The same identity had been used to rent the Rental SUV. Law enforcement officers later learned that the White Minivan had been parked outside the Keansburg Rental Property on or about November 16, 2024, at approximately 4:38 a.m, and that a Keansburg Police Department officer had run a registration check on the license plate number.

14. On or about November 18, 2024, at approximately 6:35 p.m., approximately five minutes after the foot pursuit of SALGADO VALLEJOS from the Wellesley Residence began, the Rental SUV was captured on an automatic license plate reader (“ALPR”) system near the Wellesley Residence.

15. On or about November 19, 2024, law enforcement officers located the Rental SUV in the parking lot of a hotel in Spring Valley, New York (the “Spring Valley Hotel”). Law enforcement officers saw SANGUESA AGUIRRE, PRADO SCATARZI, CASTILLO GONZALEZ, and DEL VALLE put several bags they were carrying into the Rental SUV and then get into the Rental SUV. DEL VALLE was wearing the same distinctive white sneakers with gold or tan trim that he had purchased at the retail clothing store in Watertown, Massachusetts.

16. Minutes later, law enforcement officers, including personnel from Immigration and Customs Enforcement, Enforcement and Removal Operations, lawfully detained SANGUESA AGUIRRE, PRADO SCATARZI, and CASTILLO GONZALEZ. DEL VALLE fled on foot and was not detained. Law enforcement officers lawfully searched SANGUESA AGUIRRE and recovered a high-value wristwatch, bearing a specific model number and serial number, which SANGUESA AGUIRRE was wearing on his wrist (the “High-Value Watch”).

17. Law enforcement reviewed records from the retailer that sold the High-Value Watch, which showed that one of the owners of the Colts Neck Residence had purchased the High-Value Watch for approximately \$10,022.75, including sales tax, on or about April 8, 2023.

18. Employees of the Spring Valley Hotel told law enforcement officers that the rooms in which SANGUESA AGUIRRE, PRADO SCATARZI, CASTILLO GONZALEZ, and DEL VALLE had been staying had been reserved by DEL VALLE using what appeared to be a false identification in the name of “Marco Abruzzi,” and bearing DEL VALLE’s photograph.

19. On or about December 4, 2024, law enforcement officers interviewed one of the owners of the Colts Neck Residence regarding the items stolen in the burglary.

The owner stated to law enforcement officers, in substance and in part, that the High-Value Watch belonged to him and had been stolen from the Colts Neck Residence.

20. On December 12, 2024, law enforcement officers lawfully searched the Rental SUV and recovered the bags that they had seen SANGUESA AGUIRRE, PRADO SCATARZI, CASTILLO GONZALEZ, and DEL VALLE load into the Rental SUV on or about November 19, 2024. Inside the bags, law enforcement officers found wristwatches, bracelets, earrings, designer handbags and belts, perfume bottles, and thousands of dollars in paper currency, among other items. The search of the Rental SUV and the bags found inside it also revealed tools which, based on my training and experience, are commonly used to burglarize residences, including work gloves, a pry bar, window punches, license plate covers, and an electronic jamming device that can be used to block wireless signals to deactivate residential home-security alarm systems.

21. Inside one of the bags recovered from the Rental SUV that contained Stolen Property, law enforcement officers also recovered identification documents bearing SALGADO VALLEJOS's photograph, including a false passport, false driver's license, and international driver's permit.

22. On or about December 19, 2024, law enforcement officers showed the owners of the Colts Neck Residence photographs of the items recovered from the search of the Rental SUV. The owners recognized several wristwatches, pieces of jewelry, designer bags and belts, and perfume bottles in the photographs as stolen items that had been missing from the Colts Neck Residence after the burglary that occurred on or about November 15, 2024.

23. On or about January 7, 2025, law enforcement officers located individuals whom they later confirmed to be DEL VALLE and CALDERON VALENCIA at a short-term vacation rental in the vicinity of Seattle, Washington.

24. On or about January 8, 2025, law enforcement officers learned that DEL VALLE and CALDERON VALENCIA traveled from the vicinity of Seattle, Washington to the vicinity of Carlton, Oregon, and specifically to a home offered for short-term vacation rentals (the "Oregon Rental Home").

25. Law enforcement officers learned from the owner and manager of the Oregon Rental Home that the Oregon Rental Home had been reserved starting on or about January 8, 2025, and that a group of individuals had arrived at the Oregon Rental Home on or about that day, including individuals matching the description of DEL VALLE and CALDERON VALENCIA.

26. Law enforcement officers lawfully searched the Oregon Rental Home and recovered several bags and backpacks that contained gold jewelry, diamonds, and wristwatches. The search of the bags and backpacks inside the Oregon Rental Home also revealed tools which, based on my training and experience, are commonly used

to burglarize residences, including pry bars, window punches, a portable electric power saw, and an electronic jamming device that can be used to block wireless signals to deactivate residential home-security alarm systems.