UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Crim. No. 22 549(JXN)

v. : 18 U.S.C. § 1958 18

U.S.C. § 2

ARMANDO CONCEICAO, a/k/a Armando Coceicao

INDICTMENT

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

COUNT ONE

(Conspiracy to Commit Murder-For-Hire)

 From in or about May 2021 through in or about November 2021, in the District of New Jersey and elsewhere, the defendant,

ARMANDO CONCEICAO, a/k/a Armando Coceicao,

did knowingly and intentionally conspire with others to travel in, and cause another to travel in, interstate commerce, and did use, conspire to use, and cause another to use, facilities of interstate commerce, including, but not limited to, a telephone and an automobile, with intent that a murder be committed, in violation of the laws of the State of New Jersey, specifically, N.J.S.A. § 2C:11 3, as consideration for a promise and agreement to pay something of pecuniary value, that is, United States currency.

Goal of the Conspiracy

The goal of the conspiracy was to pay a purported hitman to kill a minor child (the "Victim").

Manner and Means

- 3. It was part of the conspiracy that:
- a. In or around May 2021, CONCEICAO communicated with another individual ("Individual-1") for the purposes of having Individual-1 kill or locate another to kill the Victim.
- b. In or around May 2021, CONCEICAO met with Individual-1 in New Jersey and provided Individual-1 with an address (later determined to be the Victim's address) and showed Individual-1 a photograph of the Victim.
- c. During the meeting, CONCEICAO provided Individual-1 with a quantity of U.S. Currency to travel to Texas for the purpose of conducting reconnaissance at the Victim's residence in furtherance of the conspiracy.
- d. Shortly thereafter, in or around May 2021, Individual-1 drove from New Jersey to Texas, where he/she stayed for approximately one week. While there, Individual-1 took photographs of the Victim's residence, a car belonging to the Victim's father, and surrounding area.
- e. At some point upon Individual-1's return from Texas, CONCEICAO instructed Individual-1 to proceed with the scheme to murder the Victim.
- f. On or about November 1, 2021, CONCEICAO met with Individual-1 at a location in or around Plainfield, New Jersey. During the meeting, CONCEICAO and Individual-1 discussed the scheme to kill the Victim. For example, Individual-1 stated, in sum and substance, that he knows a "guy," who is "cheap, he's charging fifteen bucks, ten bucks, problem solved," to which

CONCEICAO responded, "ok." During the conversation, CONCEICAO inquired, "so, what does he want," to which Individual-1 replied, "he wants to know how we are going to do it."

g. Later during the meeting, Individual-1 stated, in sum and substance, "if we kill a little girl, it's just one person," to which CONCEICAO responded, "it's over. Um hmm." Individual-1 then asked, "if the whole family is there, how's it going to be?" And CONCEICAO replied, "let the girl, finish with the rest. I don't care." CONCEICAO also confirmed that the Victim is "thirteen years old."

In violation of Title 18, United States Code, Section 1958 and Section 2.

COUNT TWO
(Murder-For-Hire)

1. Paragraphs 1 through 3 of Count One of this Indictment are

realleged here.

2. From in or about May 2021 through in or about November 2021, in

the District of New Jersey and elsewhere, the defendant,

ARMANDO CONCEICAO, a/k/a Armando Coceicao,

did knowingly and intentionally cause another to travel in interstate commerce,

that is, from New Jersey to Texas, and did use, and cause another to use,

facilities of interstate commerce, including, but not limited to, a telephone and

an automobile, with intent that a murder be committed, in violation of the laws

of the State of New Jersey, specifically, N.J.S.A. § 2C:11-3, as consideration for

a promise and agreement to pay something of pecuniary value, that is, United

States currency.

In violation of Title 18, United States Code, Section 1958 and Section 2.

A TRUE BILL

FOREPERSON

PHILIP'R. SELLINGER

United States Attorney

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United States District Court District of New Jersey

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INDICTMENT FOR

18 U.S.C. § 1958 18 U.S.C. § 2

A True Bill,

Foreperson

PHILIP R. SELLINGER

UNITED STATES ATTORNEY FOR THE DISTRICT OF NEW JERSEY

> OLTA BEJLERI ASSISTANT U.S. ATTORNEY NEWARK, NJ 973-645-2737