



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

April 2021 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

TONY TYRON LEE STEWART,
RAYFORD NEWSOME, and
JEROME GREGORY BELSER,

Defendants.

CR 2:22-cr-00028-JAK

I N D I C T M E N T

[18 U.S.C. § 1951(a): Conspiracy
to Interfere with Commerce by
Robbery and Interference with
Commerce by Robbery; 18 U.S.C.
§§ 981(a)(1)(C) and 28 U.S.C.
§ 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1951(a)]

[ALL DEFENDANTS]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. T-Mobile was a national mobile telecommunications company with stores throughout the country, including locations at 2601 N. Bellflower Boulevard, Long Beach, California (the "Long Beach T-Mobile Store"), 20769 Avalon Boulevard, Carson, California (the "Carson T-Mobile Store"), 619 W. Manchester Avenue, Inglewood,

1 California (the "Inglewood Avenue T-Mobile Store"), 17133 Ventura
2 Boulevard, Encino, California (the "Encino T-Mobile Store"), and 1656
3 Arneill Road, Camarillo, California (the "Camarillo T-Mobile Store").

4 2. AT&T Wireless was a national mobile telecommunications
5 company with stores throughout the country, including a location at
6 6203 Topanga Canyon Boulevard, Woodland Hills, California
7 (the "Woodland Hills AT&T Store").

8 3. T-Mobile stores sold and distributed products in and
9 affecting interstate commerce. T-Mobile stores obtained goods to be
10 sold from outside California, including from Indiana, and from
11 outside the United States.

12 4. AT&T Wireless stores sold and distributed products in and
13 affecting interstate commerce. AT&T stores obtained goods from
14 outside California, including Texas, and from outside the United
15 States.

16 B. OBJECT OF THE CONSPIRACY

17 Beginning on a date unknown, and continuing to on or about
18 January 15, 2022, in Los Angeles and Ventura Counties, within the
19 Central District of California, and elsewhere, defendants TONY TYRON
20 LEE STEWART, RAYFORD NEWSOME, and JEROME GREGORY BELSER, and a
21 co-conspirator ("Co-Conspirator 1"), and others known and unknown to
22 the Grand Jury, conspired with each other to knowingly and
23 intentionally interfere with commerce by robbery, in violation of
24 Title 18, United States Code, Section 1951(a).

25 C. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
26 ACCOMPLISHED

27 The object of the conspiracy was to be accomplished, in
28 substance, as follows:

1 1. Defendant NEWSOME would drive defendants STEWART and
2 BELSER, and Co-Conspirator 1, to a T-Mobile or AT&T store, to commit
3 a robbery.

4 2. Defendants STEWART and BELSER, and Co-Conspirator 1, would
5 enter the T-Mobile or AT&T store during store hours to commit the
6 robbery, while defendant NEWSOME would remain in the vehicle.

7 3. Defendants STEWART and BELSER, and Co-Conspirator 1, in the
8 presence of store employees and customers, would use hammers to smash
9 display cases and phone displays in order to steal mobile telephones
10 and other electronics.

11 4. Defendants STEWART and BELSER, and Co-Conspirator 1, would
12 steal mobile phones and other electronics from the store.

13 5. Defendant NEWSOME would drive defendants STEWART and
14 BELSER, and Co-Conspirator 1, away from the robbery location after
15 the robbery was completed.

16 D. OVERT ACTS

17 In furtherance of the conspiracy, and to accomplish the object
18 of the conspiracy, on or about the following dates, defendants
19 STEWART, NEWSOME, and BELSER, and Co-Conspirator 1, and others known
20 and unknown to the Grand Jury, committed various overt acts within
21 the Central District of California, including, but not limited to,
22 the following:

23 1. Robbery of the Long Beach T-Mobile

24 Overt Act No. 1: On January 15, 2022, defendant NEWSOME drove
25 defendants STEWART and BELSER, and Co-Conspirator 1, to the Long
26 Beach T-Mobile store in a blue Kia Optima (the "Blue Kia").

27 Overt Act No. 2: On January 15, 2022, inside the Long Beach
28 T-Mobile store, defendants STEWART and BELSER, and Co-Conspirator 1,

1 smashed security display cases with hammers to remove Apple iPhones,
2 Apple Watches, and one TMO Syncup Kids Watch from their stands.

3 Overt Act No. 3: On January 15, 2022, defendants STEWART and
4 BELSER, and Co-Conspirator 1, fled the Long Beach T-Mobile store with
5 approximately five cellular telephones, one Apple Watch, and one TMO
6 Syncup Kids Watch valued at approximately \$4,834 that they had taken
7 from the store.

8 Overt Act No. 4: On January 15, 2022, defendant NEWSOME drove
9 the Blue Kia, with defendants STEWART and BELSER, and Co-Conspirator
10 1, away from the area of the Long Beach T-Mobile store.

11 2. Robbery of the Carson T-Mobile

12 Overt Act No. 5: On January 15, 2022, defendant NEWSOME drove
13 defendants STEWART and BELSER, and Co-Conspirator 1, to the Carson T-
14 Mobile store in the Blue Kia.

15 Overt Act No. 6: On January 15, 2022, inside the Carson T-
16 Mobile store, defendants STEWART and BELSER, and Co-Conspirator 1,
17 smashed security display cases with hammers to remove Apple iPhones
18 and Apple Watches from their stands.

19 Overt Act No. 7: On January 15, 2022, defendants STEWART and
20 BELSER, and Co-Conspirator 1, fled the Carson T-Mobile store with
21 approximately six cellular telephones and two Apple Watches valued at
22 approximately \$5,637 that they had taken from the store.

23 Overt Act No. 8: On January 15, 2022, defendant NEWSOME drove
24 the Blue Kia, with defendants STEWART and BELSER, and Co-Conspirator
25 1, away from the area of the Carson T-Mobile store.

1 3. Robbery of the Inglewood T-Mobile Store

2 Overt Act No. 9: On January 15, 2022, defendant NEWSOME drove
3 defendants STEWART and BELSER, and Co-Conspirator 1, in the Blue Kia
4 to the Inglewood T-Mobile store.

5 Overt Act No. 10: On January 15, 2022, inside the Inglewood T-
6 Mobile store, defendants STEWART and BELSER, and Co-Conspirator 1,
7 smashed security display cases with hammers to remove iPhones and
8 iPads from their stands.

9 Overt Act No. 11: On January 15, 2022, defendants STEWART and
10 BELSER, and Co-Conspirator 1, fled the Inglewood T-Mobile store with
11 approximately seven cellular telephones and two iPads valued at
12 approximately \$7,300 that they had taken from the store.

13 Overt Act No. 12: On January 15, 2022, defendant NEWSOME drove
14 the Blue Kia, with defendants STEWART and BELSER, and Co-Conspirator
15 1, away from the area of the Inglewood T-Mobile store.

16 4. Robbery of the Encino T-Mobile Store

17 Overt Act No. 13: On January 15, 2022, defendant NEWSOME drove
18 defendants STEWART and BELSER, and Co-Conspirator 1, in the Blue Kia
19 to the Encino T-Mobile store.

20 Overt Act No. 14: On January 15, 2022, inside the Encino T-
21 Mobile store, defendants STEWART and BELSER, and Co-Conspirator 1,
22 smashed security display cases with hammers to remove iPhones, iPads,
23 and Apple Watches from their stands.

24 Overt Act No. 15: On January 15, 2022, defendants STEWART and
25 BELSER, and Co-Conspirator 1, fled the Encino T-Mobile store with
26 approximately five cellular telephones, two iPads, and two Apple
27 Watches valued at approximately \$5,864 that they had taken from the
28 store.

1 Overt Act No. 16: On January 15, 2022, defendant NEWSOME drove
2 the Blue Kia, with defendants STEWART and BELSER, and Co-Conspirator
3 1, away from the area of the Encino T-Mobile store.

4 5. Robbery of the Woodland Hills AT&T Store

5 Overt Act No. 17: On January 15, 2022, defendant NEWSOME drove
6 defendants STEWART and BELSER, and Co-Conspirator 1, in the Blue Kia
7 to the Woodland Hills AT&T store.

8 Overt Act No. 18: On January 15, 2022, inside the Woodland
9 Hills AT&T store, defendants STEWART and BELSER, and Co-Conspirator
10 1, smashed security display cases to remove iPhones, iPads, and Apple
11 Watches from their stands.

12 Overt Act No. 19: On January 15, 2022, defendants STEWART and
13 BELSER, and Co-Conspirator 1, fled the Woodland Hills AT&T store with
14 approximately four cellular telephones, three iPads, and two Apple
15 Watches valued at approximately \$7,430 that they had taken from the
16 store.

17 Overt Act No. 20: On January 15, 2022, defendant NEWSOME drove
18 the Blue Kia, with defendants STEWART and BELSER, and Co-Conspirator
19 1, away from the area of the Woodland Hills AT&T store.

20 6. Robbery of the Camarillo T-Mobile Store

21 Overt Act No. 21: On January 15, 2022, defendant NEWSOME drove
22 defendants STEWART and BELSER, and Co-Conspirator 1, in the Blue Kia
23 to the Camarillo T-Mobile store.

24 Overt Act No. 22: On January 15, 2022, inside the Camarillo T-
25 Mobile store, defendants STEWART and BELSER, and Co-Conspirator 1,
26 smashed security display cases to remove iPhones from their stands.

27 Overt Act No. 23: On January 15, 2022, defendants STEWART and
28 BELSER and Co-Conspirator 1 fled the Camarillo T-Mobile store with

1 approximately three cellular telephones valued at approximately
2 \$2,730 that they had taken from the store.

3 Overt Act No. 24: On January 15, 2022, defendant NEWSOME drove
4 the Blue Kia, with defendants STEWART and BELSER, and Co-Conspirator
5 1, away from the area of the Camarillo T-Mobile store.

6 Overt Act No. 25: On January 15, 2022, defendant NEWSOME drove
7 the Blue Kia, with defendants STEWART and BELSER, and Co-Conspirator
8 1, away from police officers who were attempting to affect a lawful
9 traffic stop and led officers on a vehicle pursuit throughout a
10 residential neighborhood in Los Angeles.

11 Overt Act No. 26: On January 15, 2022, defendants NEWSOME,
12 STEWART, and BELSER, and Co-Conspirator 1 possessed the phones and
13 other electronics that they had stolen earlier that day in the Blue
14 Kia and in a backpack that they threw out of the Blue Kia during the
15 vehicle pursuit.

COUNT TWO

[18 U.S.C. §§ 1951(a), 2(a)]

[ALL DEFENDANTS]

On or about January 15, 2022, in Los Angeles County, within the Central District of California, defendants TONY TYRON LEE STEWART, RAYFORD NEWSOME, and JEROME GREGORY BELSER, each aiding and abetting the other, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by knowingly and willingly committing robbery, in that defendants STEWART, NEWSOME, and BELSER unlawfully took and obtained property consisting of approximately five cellular telephones, one Apple Watch, and one TMO Syncup Kids Watch valued at approximately \$4,834 belonging to T-Mobile from a T-Mobile store located at 2601 N. Bellflower Boulevard, Long Beach, California, a commercial telecommunications store, the inventory of which traveled in interstate commerce, in the presence of employees of T-Mobile, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property, and property in their custody and possession.

COUNT THREE

[18 U.S.C. §§ 1951(a), 2(a)]

[ALL DEFENDANTS]

On or about January 15, 2022, in Los Angeles County, within the Central District of California, defendants TONY TYRON LEE STEWART, RAYFORD NEWSOME, and JEROME GREGORY BELSER, each aiding and abetting the other, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by knowingly and willingly committing robbery, in that defendants STEWART, NEWSOME, and BELSER unlawfully took and obtained property consisting of approximately six cellular telephones and two Apple Watches valued at approximately \$5,637 belonging to T-Mobile from a T-Mobile store located at 20769 Avalon Boulevard, Carson, California, a commercial telecommunications store, the inventory of which traveled in interstate commerce, in the presence of employees of T-Mobile, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property, and property in their custody and possession.

COUNT FOUR

[18 U.S.C. §§ 1951(a), 2(a)]

[ALL DEFENDANTS]

On or about January 15, 2022, in Los Angeles County, within the Central District of California, defendants TONY TYRON LEE STEWART, RAYFORD NEWSOME, and JEROME GREGORY BELSER, each aiding and abetting the other, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by knowingly and willingly committing robbery, in that defendants STEWART, NEWSOME, and BELSER unlawfully took and obtained property consisting of approximately seven cellular telephones and two iPads valued at approximately \$7,300 belonging to T-Mobile from a T-Mobile store located at 619 W. Manchester Avenue, Inglewood, California, a commercial telecommunications store, the inventory of which traveled in interstate commerce, in the presence of employees of T-Mobile, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property, and property in their custody and possession.

COUNT FIVE

[18 U.S.C. §§ 1951(a), 2(a)]

[ALL DEFENDANTS]

On or about January 15, 2022, in Los Angeles County, within the Central District of California, defendants TONY TYRON LEE STEWART, RAYFORD NEWSOME, and JEROME GREGORY BELSER, each aiding and abetting the other, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by knowingly and willingly committing robbery, in that defendants STEWART, NEWSOME, and BELSER unlawfully took and obtained property consisting of approximately five cellular telephones, two iPads, and two Apple Watches valued at approximately \$5,864 belonging to T-Mobile from a T-Mobile store located at 17133 Ventura Boulevard, Encino, California, a commercial telecommunications store, the inventory of which traveled in interstate commerce, in the presence of employees of T-Mobile, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property, and property in their custody and possession.

COUNT SIX

[18 U.S.C. §§ 1951(a), 2(a)]

[ALL DEFENDANTS]

On or about January 15, 2022, in Los Angeles County, within the Central District of California, defendants TONY TYRON LEE STEWART, RAYFORD NEWSOME, and JEROME GREGORY BELSER, each aiding and abetting the other, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by knowingly and willingly committing robbery, in that defendants STEWART, NEWSOME, and BELSER unlawfully took and obtained property consisting of approximately four cellular telephones, three iPads, and two Apple Watches valued at approximately \$7,430 belonging to AT&T Wireless from an AT&T Wireless store located at 6203 Topanga Canyon Boulevard, Woodland Hills, California, a commercial telecommunications store, the inventory of which traveled in interstate commerce, in the presence of employees of AT&T Wireless, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property, and property in their custody and possession.

COUNT SEVEN

[18 U.S.C. §§ 1951(a), 2(a)]

[ALL DEFENDANTS]

On or about January 15, 2022, in Ventura County, within the Central District of California, defendants TONY TYRON LEE STEWART, RAYFORD NEWSOME, and JEROME GREGORY BELSER, each aiding and abetting the other, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by knowingly and willingly committing robbery, in that defendants STEWART, NEWSOME, and BELSER unlawfully took and obtained property consisting of approximately three cellular telephones valued at approximately \$2,730 belonging to T-Mobile from a T-Mobile store located at 1656 Arneill Road, Camarillo, California, a commercial telecommunications store, the inventory of which traveled in interstate commerce, in the presence of employees of T-Mobile, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property, and property in their custody and possession.

FORFEITURE ALLEGATION

[18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Counts One through Seven of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to any of the offenses;

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), any defendant so convicted shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been

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1 placed beyond the jurisdiction of the court; (d) has been
2 substantially diminished in value; or (e) has been commingled with
3 other property that cannot be divided without difficulty.

4
5 A TRUE BILL

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7 /S/

8
9 Foreperson

10 TRACY L. WILKISON
11 United States Attorney



12 SCOTT M. GARRINGER
13 Assistant United States Attorney
14 Chief, Criminal Division

15 JOANNA M. CURTIS
16 Assistant United States Attorney
17 Chief, Violent and Organized
18 Crime Section

19 KEVIN J. BUTLER
20 KEVIN B. REIDY
21 Assistant United States Attorneys
22 Violent and Organized Crime
23 Section
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26
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