

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

SEALED,

Defendant.

CRIMINAL NO.: 15-162 GAF

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MOTION TO SEAL

TO THE HONORABLE COURT:

COMES NOW, the United States of America, by and through the undersigned attorney, and very respectfully states and prays as follows:

1. That attached to this motion is a sealed envelope containing pleadings that are self-explanatory.
2. That after due consideration by this Honorable Court, the United States of America respectfully requests that the pleading be kept under seal until the first arrest has been executed.

WHEREFORE, the United States respectfully prays this Honorable Court to grant this request.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 4th day of March 2015.

Edward Veronda

Edward Veronda
Assistant U.S. Attorney – G01815
US Attorney's Office
Torre Chardon, Suite 1201
350 Chardon Ave.
San Juan, PR 00918
Tel. (787) 766-5656

3/4/15 granted. *afu*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

[1] Carlos Gotay Guzman, a.k.a. "Moro," a.k.a. "Negro"

(Counts ONE through SIX)

[2] Javier Gonzalez Perez, a.k.a. "Javier Tornillo"

(Counts ONE through SIX)

[3] Reinaldo Colon Oliveras, a.k.a. "Tito Capao," a.k.a. "Tito"

(Counts ONE through SIX, and EIGHT)

[4] Roberto Maldonado Rodriguez, a.k.a. Roberto Maldonado Lopez, a.k.a. "Robert El Calvo," a.k.a. "Robert Cortes," a.k.a. "Gordo"

(Counts ONE through SIX)

[5] Carlos Vazquez Otero, a.k.a. "Carlos Misquin," a.k.a. "Carlos Tatoo"

(Counts ONE through SIX)

[6] Julio Alberto Rivera-Rodriguez, a.k.a. "Ito"

(Counts ONE through SIX)

[7] Eric O. Rosa-Ramos, a.k.a. "El Indio," a.k.a. "Eric El Siete"

(Counts ONE through FIVE)

[8] Jorge L. Alicia Pagan, a.k.a. "Bebo Conejo"

(Counts ONE through SIX)

[9] Alfredo Virella Laureano, a.k.a. "Keko"

(Counts ONE through SIX)

[10] Christian Rodriguez Rivera, a.k.a. "Cuso," a.k.a. "Cuzo"

(Counts ONE through SIX)

[11] Jose M. Rivera Molina, a.k.a. "Bolillo"

(Counts ONE through SIX)

[12] Jonathan Ortiz Salgado, a.k.a. "Cochi," a.k.a. "Cochinola"

(Counts ONE through SIX)

SEALED
INDICTMENT

CRIMINAL NO. 15-162 (JAF)

Violations:

(COUNT ONE)

Title 21, United States Code, Sections 841(a)(1), 846, and 860

(COUNT TWO)

Title 21, United States Code, §§ 841(a)(1) and 860 and Title 18, United States Code, § 2

(COUNT THREE)

Title 21, United States Code, §§841(a)(1) and 860 and Title 18, United States Code, § 2

(COUNT FOUR)

Title 21, United States Code, §§ 841(a)(1) and 860 and Title 18, United States Code, § 2

(COUNT FIVE)

Title 21, United States Code, §§ 841(a)(1) and 860 and Title 18, United States Code, § 2

(COUNT SIX)

Title 18, United States Code, § 924(c)

(COUNT SEVEN)

Title 18, United States Code, §§ 1956(a)(1)(B), 1956(n) and 982

(COUNT EIGHT)

Title 18, United States Code, §§

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- [13] **Juan Ramiro Fonseca-Otero, a.k.a. "Burro," a.k.a. "Burro de Quintana"**
(Counts ONE through FIVE)
- [14] **Hector Moreno Rivera, a.k.a. "Mickey Bay"**
(Counts ONE through SIX)
- [15] **Anibal Garcia Quiñones, a.k.a. Anibal Junior Garcia, a.k.a. "Junior El Manco," a.k.a. "Junior Anibal"**
(Counts ONE through FIVE)
- [16] **Luis Daniel Rosa-Santiago, a.k.a. "Luisda"**
(Counts ONE through FIVE)
- [17] **Jose Resto-Laureano, a.k.a. "Piti," a.k.a. "Pitín"**
(Counts ONE through FIVE)
- [18] **Jaime Freytes Maldonado, a.k.a. "Micro"**
(Counts ONE through SIX)
- [19] **Alexander Aviles Santiago, a.k.a. "Pipo," a.k.a. "Pipo El Mono"**
(Counts ONE through FIVE)
- [20] **Hector Colon Romero, a.k.a. "Coscu"**
(Counts ONE through SIX)
- [21] **Ulises Soto Soto,**
(Counts ONE through FIVE)
- [22] **Jose Luis Ortiz Vega, a.k.a. "Bebo Chino," a.k.a. "Bebo Chinito,"**
(Counts ONE through FIVE)
- [23] **Christian Pantoja-Sanchez, a.k.a. "Wolf"**
(Counts ONE through FIVE)
- [24] **Ernie Vega Cruz, a.k.a. "Ernie Perla"**
(Counts ONE through FIVE)
- [25] **Jonathan Figueroa Hernandez, a.k.a. "Jonathan Mickey Mouse," a.k.a. "Mickey Mouse,"**
(Counts ONE through FIVE)
- [26] **Roberto R. Valle Cordero, a.k.a. "Robert de Niro," a.k.a. "Robert El Jincho," a.k.a. "Robert El Blanco," a.k.a. "Robertillo," a.k.a. "Robert El Primo de Checo",**
(Counts ONE through SIX)
- [27] **Ramon J. Figueroa Colon, a.k.a. "Bengay," a.k.a. "El Visco"**

1956(a)(1)(B), 1956(h) and 982

(COUNT NINE)

Title 18, United States Code, §§ 1956(a)(1)(B)

(COUNT TEN)

Title 18, United States Code, §§ 1957

**Narcotics and Money Laundering
Forfeiture Allegation**

Title 21, United States Code, § 853; Rule 32.2(a) F.R.C.P; Title 18, United States Code, Section 982(a)(1)

(TEN COUNTS)

(Counts ONE through FIVE)

[28] Josue Salgado Pagan, a.k.a. "Tony Monaco," a.k.a. "Bambi"

(Counts ONE through FIVE, NINE through TEN)

[29] Hector Earl Montilla-Battice, a.k.a. "Cacho"

(Counts ONE through FIVE)

[30] Christian Torres Moran, a.k.a. "Palomita"

(Counts ONE through FIVE)

[31] Jessie Vega Quiñones

(Counts ONE through SIX)

[32] Alex Jose Babilonia-Torres, a.k.a. "Alex Moña"

(Counts ONE through SIX)

[33] Luis Ernesto Gonzalez Moreno, a.k.a. "Poeta"

(Counts ONE through FIVE)

[34] Luis M. Cortes Class, a.k.a. "Luis El Loco," a.k.a. "Luisito,";

(Counts ONE through FIVE)

[35] Hector M. Rodriguez Soto, a.k.a.

"Buddhita," a.k.a. "Budita"

(Counts ONE through FIVE)

[36] Omar E. Mendoza Vidal, a.k.a. "Cuajo," a.k.a. "Cuajito"

(Counts ONE through FIVE)

[37] Edwin Montijo Gonzalez, a.k.a. "Joel Sandwich"

(Counts ONE through FIVE)

[38] Luis Centeno Ortiz

(Counts ONE through FIVE)

[39] Edwin Mendoza Vargas, a.k.a. "Pito Chuli Mami," a.k.a. "Pito Chuli"

(Counts ONE through FIVE)

[40] Ruben de Jesus-Ortiz, a.k.a. "Rubencito"

(Counts ONE through FIVE)

[41] Jose Rivera Medina, a.k.a. "Pito Lllaga," a.k.a. "Pito Llagoso"

(Counts ONE through FIVE)

[42] Jovanny Reyes Sanchez, a.k.a. "Jovanny El Lento"

(Counts ONE through FIVE)

[43] Elizabeth Gerena Santiago, a.k.a. "Eli La Mona," a.k.a. "Eli La Pata," a.k.a. "Eli La Tigresa"

(Counts ONE through FIVE)

[44] Kelvin Xavier Nieves-De Jesus, a.k.a. "Kelvin Blue," a.k.a. "Kelvin Azul"

[45] Ruben Larregui Lopez, a.k.a. "Cusito"
(Counts ONE through FIVE)

[46] Fernando J. Muniz Vega, a.k.a. "Joel Vega," a.k.a. "Joel Meao de Foca"

(Counts ONE through FIVE)

[47] Emmanuel Salgado Gonzalez, a.k.a. "Mejico," a.k.a. "Mejicano," a.k.a. "Mexico," a.k.a. "Mexicano"

(Counts ONE through FIVE)

[48] Danny Salgado Gonzalez, a.k.a. "Danny"
(Counts ONE through FIVE)

[49] Luis A. Serrano Aponte, a.k.a. "Cachi"
(Counts ONE through FIVE)

[50] Luis Angel Siragusa Soto, a.k.a. "El Gordo Siragusa," a.k.a. "Gordo Gemelo," a.k.a. "Gemelo Siragusa"

(Counts ONE through FIVE)

[51] Carlos Jose Siragusa Soto, a.k.a. "Bebe Siragusa," a.k.a. "Bebe Marmol"

(Counts ONE through FIVE)

[52] Christian O. Rodriguez Morales, a.k.a. "Christian El Lento"

(Counts ONE through FIVE)

[53] Dennis Colon Laureano, a.k.a. "Buho"
(Counts ONE through FIVE)

[54] Shaquille E. Rivera de Jesus
(Counts ONE through FIVE)

[55] Ruth Emily Hernaiz Rojas, a.k.a. "Ruty"
(Counts ONE through FIVE)

[56] Luis Antonio Ibañez-Bello, a.k.a. "Gordo Ibanez," a.k.a. "El Bouncer"

(Counts ONE through FIVE)

[57] Jose Antonio Acevedo Nazario, a.k.a. "Sindicato"

(Counts ONE through FIVE, and SEVEN)

[58] Beatriz de Los Angeles Ortiz-Sanchez,

a.k.a. "Bea"

(Counts ONE through FIVE)

[59] Jose O. Padilla Flores, a.k.a. "Landi"

(Count SEVEN)

[60] Jorge Rivera Sanchez

(Count EIGHT)

[61] Leslie Delgado Diaz

(Count EIGHT)

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

Beginning on a date unknown, but no later than in or about the year 2000, and continuing up to and until the return of the instant Indictment, in the Municipality of Manati, District of Puerto Rico and within the jurisdiction of this Court,

[1] Carlos Gotay Guzman, a.k.a. "Moro," a.k.a. "Negro"

[2] Javier Gonzalez Perez, a.k.a. "Javier Tornillo"

[3] Reinaldo Colon Oliveras, a.k.a. "Tito Capao," a.k.a. "Tito"

[4] Roberto Maldonado Rodriguez, a.k.a. Roberto Maldonado Lopez, a.k.a. "Robert El Calvo," a.k.a. "Robert Cortes," a.k.a. "Gordo"

[5] Carlos Vazquez Otero, a.k.a. "Carlos Misquin," a.k.a. "Carlos Tattoo"

[6] Julio Alberto Rivera-Rodriguez, a.k.a. "Ito"

[7] Eric O. Rosa-Ramos, a.k.a. "El Indio," a.k.a. "Eric El Siete"

[8] Jorge L. Alicia Pagan, a.k.a. "Bebo Conejo"

[9] Alfredo Virella Laureano, a.k.a. "Keko"

[10] Christian Rodriguez Rivera, a.k.a. "Cuso," a.k.a. "Cuzo"

[11] Jose M. Rivera Molina, a.k.a. "Bolillo"

[12] Jonathan Ortiz Salgado, a.k.a. "Cochi," a.k.a. "Cochinola"

[13] Juan Ramiro Fonseca-Otero, a.k.a. "Burro," a.k.a. "Burro de Quintana"

[14] Hector Moreno Rivera, a.k.a. "Mickey Bay"

[15] Anibal Garcia Quiñones, a.k.a. Anibal Junior Garcia, a.k.a. "Junior El Manco," a.k.a. "Junior Anibal"

[16] Luis Daniel Rosa-Santiago, a.k.a. "Luisda"

[17] Jose Resto-Laureano, a.k.a. "Piti," a.k.a. "Pitín"

- [18] Jaime Freytes Maldonado, a.k.a. "Micro"
- [19] Alexander Aviles Santiago, a.k.a. "Pipo," a.k.a. "Pipo El Mono"
- [20] Hector Colon Romero, a.k.a. "Coscu"
- [21] Ulises Soto Soto,
- [22] Jose Luis Ortiz Vega, a.k.a. "Bebo Chino," a.k.a. "Bebo Chinito,"
- [23] Christian Pantoja-Sanchez, a.k.a. "Wolf"
- [24] Ernie Vega Cruz, a.k.a. "Ernie Perla"
- [25] Jonathan Figueroa Hernandez, a.k.a. "Jonathan Mickey Mouse," a.k.a. "Mickey Mouse,"
- [26] Roberto R. Valle Cordero, a.k.a. "Robert de Niro," a.k.a. "Robert El Jincho," a.k.a. "Robert El Blanco," a.k.a. "Robertillo," a.k.a. "Robert El Primo de Checo",
- [27] Ramon J. Figueroa Colon, a.k.a. "Bengay," a.k.a. "El Visco"
- [28] Josue Salgado Pagan, a.k.a. "Tony Monaco," a.k.a. "Bambi"
- [29] Hector Earl Montilla-Battice, a.k.a. "Cacho"
- [30] Christian Torres Moran, a.k.a. "Palomita"
- [31] Jessie Vega Quiñones
- [32] Alex Jose Babilonia-Torres, a.k.a. "Alex Moña"
- [33] Luis Ernesto Gonzalez Moreno, a.k.a. "Poeta"
- [34] Luis M. Cortes Class, a.k.a. "Luis El Loco," a.k.a. "Luisito,";
- [35] Hector M. Rodriguez Soto, a.k.a. "Buddhita," a.k.a. "Budita"
- [36] Omar E. Mendoza Vidal, a.k.a. "Cuajo," a.k.a. "Cuajito"
- [37] Edwin Montijo Gonzalez, a.k.a. "Joel Sandwich"
- [38] Luis Centeno Ortiz
- [39] Edwin Mendoza Vargas, a.k.a. "Pito Chuli Mami," a.k.a. "Pito Chuli"
- [40] Ruben de Jesus-Ortiz, a.k.a. "Rubencito"
- [41] Jose Rivera Medina, a.k.a. "Pito Lllaga," a.k.a. "Pito Llagoso"
- [42] Jovanny Reyes Sanchez, a.k.a. "Jovanny El Lento"
- [43] Elizabeth Gerena Santiago, a.k.a. "Eli La Mona," a.k.a. "Eli La Pata," a.k.a. "Eli La Tigresa"
- [44] Kelvin Xavier Nieves-De Jesus, a.k.a. "Kelvin Blue," a.k.a. "Kelvin Azul"
- [45] Ruben Larregui Lopez, a.k.a. "Cusito"
- [46] Fernando J. Muniz Vega, a.k.a. "Joel Vega," a.k.a. "Joel Meao de Foca"
- [47] Emmanuel Salgado Gonzalez, a.k.a. "Mejico," a.k.a. "Mejicano," a.k.a. "Mexico," a.k.a. "Mexicano"
- [48] Danny Salgado Gonzalez, a.k.a. "Danny"
- [49] Luis A. Serrano Aponte, a.k.a. "Cachi"
- [50] Luis Angel Siragusa Soto, a.k.a. "El Gordo Siragusa," a.k.a. "Gordo Gemelo," a.k.a. "Gemelo Siragusa"
- [51] Carlos Jose Siragusa Soto, a.k.a. "Bebe Siragusa," a.k.a. "Bebe Marmol"
- [52] Christian O. Rodriguez Morales, a.k.a. "Christian El Lento"

[53] Dennis Colon Laureano, a.k.a. "Buho"

[54] Shaquille E. Rivera de Jesus

[55] Ruth Emily Hernaiz Rojas, a.k.a. "Ruty"

[56] Luis Antonio Ibañez-Bello, a.k.a. "Gordo Ibanez," a.k.a. "El Bouncer"

[57] Jose Antonio Acevedo Nazario, a.k.a. "Sindicato"

[58] Beatriz de Los Angeles Ortiz-Sanchez, a.k.a. "Bea"

the defendants herein, did knowingly and intentionally, combine, conspire, and agree with each other and with other diverse persons, known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and intentionally possess with intent to distribute and/or to distribute controlled substances, to wit: two hundred and eighty (280) grams or more of a substance or mixture containing a detectable amount of cocaine base (crack), a Schedule II Narcotic Drug Controlled Substance; one (1) kilogram or more of a substance or mixture containing a detectable amount of heroin, a Schedule I, Narcotic Drug Controlled Substance; five (5) kilograms or more of a substance or mixture containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance; one hundred (100) kilograms or more of a substance or mixture containing a detectable amount of marijuana, a Schedule I, Controlled Substance; a mixture or substance containing detectable amounts of Oxycodone (commonly known as "Percocet"), a Schedule II Controlled Substance; and a mixture or substance containing detectable amounts of Alprazolam (commonly known as "Xanax"), a Schedule IV Controlled Substance; all within one thousand (1,000) feet of the real property comprising a housing facility owned by a public housing authority. All in violation of Title 21, United States Code Sections 841(a)(1), 846 and 860.

I. OBJECT OF THE CONSPIRACY

The object of the conspiracy was to distribute controlled substances at the Enrique Zorilla Public Housing Project, the Los Murales Public Housing Project, the Cortes Ward, the San Jose

Ward and the Acueducto Ward, all located in the Municipality of Manati, Puerto Rico. The Acueducto Ward drug point was formerly located at "La Cruz." The conspiracy also distributed controlled substances at V & B Public Housing Project in the Municipality of Barceloneta, Puerto Rico, and the Villas de Florida Public Housing Project, located in the Municipality of Florida, Puerto Rico; all for significant financial gain and profit.

II. MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and co-conspirators would accomplish and further the object of the conspiracy, among others, included the following:

1. It was part of the manner and means of the conspiracy that the defendants and their co-conspirators would purchase wholesale quantities of heroin, cocaine, marijuana, Alprazolam ("Xanax") and Oxycodone ("Percocet"), in order to distribute the same in street quantity amounts at their drug distribution point located in the Enrique Zorilla Public Housing Project, located in the Municipality of Manati, Puerto Rico, as well as the other drugs points the drug trafficking organization controlled.

2. It was further part of the manner and means of the conspiracy that the leaders would maintain a group of co-defendants administrating the daily activities of the drug distribution point. The defendants and their co-conspirators would act in different roles in order to further the goals of the conspiracy, to wit: leaders and drug point owners who directed and supervised runners, enforcers, sellers, drug processors, lookouts, and facilitators.

3. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would weigh, "cut", divide, and package the cocaine, crack, heroin, and marijuana in distinctive "baggies" and/or "vials" in order to keep track of their narcotics.

4. It was a further part of the manner and means of the conspiracy that some of the cocaine purchased at wholesale quantities would be converted into crack cocaine, "cooked", for subsequent sale and distribution at their drug distribution points.

5. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would use apartments and other areas inside and nearby the Enrique Zorilla Public Housing Project, in order to store and conceal heroin, cocaine base ("crack"), cocaine, marijuana, Alprazolam ("Xanax"), Oxycodone ("Percocet"), drug paraphernalia, firearms and ammunition.

6. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would often package and prepare the narcotics in various apartments and residences located throughout the Municipality of Manati, using those apartments and residences as "drug laboratories".

7. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would be armed while engaged in their various roles within the organization.

8. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would often act as "look-outs" at strategically located "observation points" within the Enrique Zorilla Public Housing Project, in order to alert other co-conspirators of the presence of law enforcement agents and/or rival drug traffickers.

9. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would routinely possess, carry, brandish, and use firearms to protect themselves and their drug trafficking organization. At different points during the conspiracy, the leaders and facilitators would provide to some members of the organization with

different types of firearms, including but not limited to, fully automatic weapons in order to protect themselves, the narcotics and their profits from rival drug trafficking gangs.

10. It was further part of the manner and means of the conspiracy that members of the drug trafficking organization would use force, violence, and intimidation in order to intimidate rival drug trafficking organizations, and in order to discipline members of their own drug trafficking organization.

11. It was further part of the manner and means of the conspiracy that the leaders of the drug trafficking organization had final approving authority as to disciplinary action to be imposed upon residents of the Enrique Zorilla Public Housing Project and/or members of the conspiracy, as well as enemies of the drug trafficking organization.

12. It was further part of the manner and means of the conspiracy that at times material to this indictment that there would be different drug owners for the drugs sold at the drug point, sometimes with two (2) persons owning the same drug, as well as the brands and/or colors used to distinguish the various drugs sold at the drug point.

III. ROLES OF THE MEMBERS OF THE CONSPIRACY

A. Leaders/Drug Point Owners/Enforcers

Leaders directly controlled and supervised the drug trafficking activities at the drug distribution points located at the Enrique Zorilla Public Housing Project, as well as the other drugs points the drug trafficking organization controlled, located in the Municipality of Manati, the Municipality of Barceloneta, and the Municipality of Florida, Puerto Rico. During the span of the conspiracy, leaders purchased multi-kilogram quantities of narcotics and oversaw the transportation and sale of such narcotics by their subordinates at the drug points. At various times during the course of the conspiracy, leaders purchased firearms and would require that

members of the conspiracy to carry such firearms and ammunition in order to protect the drug distribution activities.

Enforcers did possess, carry, brandish, use and discharge firearms to protect the leaders and members of the drug trafficking organization, the narcotics, the proceeds derived from their sales, and to further accomplish the goals of the conspiracy. Enforcers often acted upon instructions given by the leaders of this organization. Enforcers would often provide protection to the drug trafficking organization's drug distribution point. The following individuals, and others known and unknown to the Grand Jury, acted as leaders, "owners", and/or enforcers for the drug trafficking organization:

[1] Carlos Gotay Guzman, a.k.a. "Moro," a.k.a. "Negro" is the main leader of the drug trafficking organization.

From in or around the year 2000, he was a high-ranking member of the conspiracy who supplied and was the "owner" of the heroin distributed in the conspiracy. On or about June 2008, he became one of the main leaders of the drug trafficking organization. As one of the main leaders, **[1] Carlos Gotay Guzman, a.k.a. "Moro," a.k.a. "Negro"** directly supervised the operations at Enrique Zorilla Public Housing Project, as well as the other drugs points, received the proceeds from the distribution of narcotics sold during the span of his leadership in the conspiracy and was in charge of maintaining control of all the drug distribution activities. He also controlled the drug points located at Los Murales Public Housing Project, the Cortes Ward, and the Acueducto Ward (formerly located at "La Cruz"), all located in the Municipality of Manati, Puerto Rico. He had the final approving authority as to the discipline to be imposed upon residents of the Enrique Zorilla Public Housing Project, residents in and around the Municipality of Manati, and members of the conspiracy, as well as its enemies and rivals. At

times during the conspiracy, [1] **Carlos Gotay Guzman, a.k.a. "Moro," a.k.a. "Negro"**, was the "owner" of the cocaine, crack-cocaine, marijuana, heroin, "Xanax" and "Percocet." He would also act as an enforcer and supplier within the conspiracy. He would also carry and possess firearms in furtherance of the drug trafficking organization.

[2] **Javier Gonzalez Perez, a.k.a. "Javier Tornillo"** was also a leader in the drug trafficking organization. He was in charge of the drug points located at V & B Public Housing Project, in the Municipality of Barceloneta, San Jose Ward, in the Municipality of Manati; and Villas de Florida Public Housing Project in the Municipality of Florida, Puerto Rico. He was in charge of collecting narcotics proceeds and resupplying the narcotics. He would also carry and possess firearms in furtherance of the drug trafficking organization.

[3] **Reinaldo Colon Oliveras, a.k.a. "Tito Capao," a.k.a. "Tito"** was also a high ranking member in the drug trafficking organization that acted as an enforcer, and would use force, violence, and intimidation in order to intimidate rival drug trafficking organizations, and in order to discipline members of their own drug trafficking organization. He would also carry and possess firearms in furtherance of the drug trafficking organization. At times during the conspiracy, he also worked as a seller, a runner, a drug processor, and a firearms and ammunition facilitator.

[4] **Roberto Maldonado Rodriguez, a.k.a. Roberto Maldonado Lopez, a.k.a. "Robert El Calvo," a.k.a. "Robert Cortes," a.k.a. "Gordo"**, was the leader in charge of the drug point located at the Cortes Ward, located in the Municipality of Manati, Puerto Rico. He was also an enforcer. He would also carry and possess firearms in furtherance of the drug trafficking organization.

[5] **Carlos Vazquez Otero, a.k.a. "Carlos Misquin," a.k.a. "Carlos Tattoo"**, was a

drug point owner known as the “owner” and runner of the \$5 cocaine. He would also carry and possess firearms in furtherance of the drug trafficking organization.

[6] **Julio Alberto Rivera-Rodriguez, a.k.a. “Ito”**, was a drug point owner known as the “owner” and runner of the \$10 cocaine. He would also carry and possess firearms in furtherance of the drug trafficking organization.

[7] **Eric O. Rosa-Ramos, a.k.a. “El Indio,” a.k.a. “Eric El Siete”**, was a drug point owner known as the “owner” of the \$7 marijuana.

[8] **Jorge L. Alicia Pagan, a.k.a. “Bebo Conejo”**, was a drug point owner known as an “owner” of marijuana in the Acueducto and Los Murales PHP drug points. He also a runner, a seller, and a drug processor. He would also carry and possess firearms in furtherance of the drug trafficking organization.

[9] **Alfredo Virella Laureano, a.k.a. “Keko”**, was a drug point owner, a runner, a drug processor, and a firearms facilitator. He would also carry and possess firearms in furtherance of the drug trafficking organization.

[10] **Christian Rodriguez Rivera, a.k.a. “Cuso,” a.k.a. “Cuzo”**, was a drug point owner known as an “owner” and runner of the \$5 cocaine. He continued to “own” a seal of narcotics while still incarcerated. He would also carry and possess firearms in furtherance of the drug trafficking organization.

[11] **Jose M. Rivera Molina, a.k.a. “Bolillo”**, was an enforcer. He would also carry and possess firearms in furtherance of the drug trafficking organization.

[12] **Jonathan Ortiz Salgado, a.k.a. “Cochi,” a.k.a. “Cochinola”**, was an enforcer, runner, and drug processor. He would also carry and possess firearms in furtherance of the drug trafficking organization.

B. Suppliers

The suppliers were the defendants and their co-conspirators that would perform or carry out several acts within the conspiracy including but not limited to, supplying narcotics and/or firearms and/or ammunition to the drug distribution organization and/or drug distribution points located in the Municipality of Manati, Puerto Rico.

In addition to those previously mentioned, the following individuals and others known and unknown to the Grand Jury, acted as wholesale suppliers of narcotics for the drug trafficking organization:

[13] Juan Ramiro Fonseca-Otero, a.k.a. "Burro," a.k.a. "Burro de Quintana",

[14] Hector Moreno Rivera, a.k.a. "Mickey Bay", who would also carry and possess firearms in furtherance of the drug trafficking organization.

C. Runners

The runners worked under the direct supervision of the leaders of the drug trafficking organization. They were responsible for providing sufficient narcotics to the sellers for further distribution at the drug point. They were also responsible for collecting the proceeds of drug sales and paying the street sellers. They would also supervise and make sure that there were street sellers for every shift of the drug point. They would make schedules and prepare ledgers to maintain accountability of the sales of the narcotics sold at the drug point. At various times, they would be responsible for recruiting street sellers and additional runners. The runners had a supervisory role within the conspiracy, as they would directly supervise on a daily basis, the activities of multiple sellers, and the activities of the drug point.

In addition to those previously mentioned, the following individuals and others known and unknown to the Grand Jury, acted as runners for the drug trafficking organization:

[15] **Anibal Garcia Quiñones, a.k.a. Anibal Junior Garcia, a.k.a. “Junior El Manco,” a.k.a. “Junior Anibal”**, was a runner and a seller,

[16] **Luis Daniel Rosa-Santiago, a.k.a. “Luisda”**, was a runner and a seller.

[17] **Jose Resto-Laureano, a.k.a. “Piti,” a.k.a. “Pitín”**, was a runner and a drug processor.

[18] **Jaime Freytes Maldonado, a.k.a. “Micro”**, who would also carry and possess firearms in furtherance of the drug trafficking organization.

[19] **Alexander Aviles Santiago, a.k.a. “Pipo,” a.k.a. “Pipo El Mono”**, who would also carry and possess firearms in furtherance of the drug trafficking organization.

[20] **Hector Colon Romero, a.k.a. “Coscu”**, was a runner and a seller. He would also carry and possess firearms in furtherance of the drug trafficking organization.

[21] **Ulises Soto Soto**, was a runner and a seller

[22] **Jose Luis Ortiz Vega, a.k.a. “Bebo Chino,” a.k.a. “Bebo Chinito,”** was a runner and a seller.

[23] **Christian Pantoja-Sanchez, a.k.a. “Wolf”**, was a runner and a seller.

[24] **Ernie Vega Cruz, a.k.a. “Ernie Perla”**, was a runner

[25] **Jonathan Figueroa Hernandez, a.k.a. “Jonathan Mickey Mouse,” a.k.a. “Mickey Mouse,”** was a runner and a seller.

D. Drug Processors

Drug processors would meet under the direction of the leaders of the drug trafficking organization in order to weigh, cut, mix, and prepare the controlled substances for street distribution. They would also package the heroin, crack, cocaine and marijuana in single dosage amounts and in distinctive “baggies,” “decks,” and/or “vials.”

[26] **Roberto R. Valle Cordero, a.k.a. "Robert de Niro," a.k.a. "Robert El Jincho," a.k.a. "Robert El Blanco," a.k.a. "Robertillo," a.k.a. "Robert El Primo de Checo"**, was the "owner" of the "Cripy" marijuana, a runner, and a drug processor. He would also carry and possess firearms in furtherance of the drug trafficking organization.

[27] **Ramon J. Figueroa Colon, a.k.a. "Bengay," a.k.a. "El Visco"**, was a drug processor and runner of heroin.

[28] **Josue Salgado Pagan, a.k.a. "Tony Monaco," a.k.a. "Bambi"**, was a drug processor of cocaine base (Crack).

[29] **Hector Earl Montilla-Battice, a.k.a. "Cacho"**, was a drug processor of cocaine, and a runner and a seller.

[30] **Christian Torres Moran, a.k.a. "Palomita"**, was a drug processor and seller.

[31] **Jessie Vega Quiñones**, was a drug processor of cocaine, and a firearms and ammunition facilitator. He would also carry and possess firearms in furtherance of the drug trafficking organization.

E. Sellers

The sellers would distribute street quantity amounts of heroin, crack cocaine, cocaine, marijuana, Alprazolam (Xanax), and Oxycodone (Percocet). As sellers, they were accountable for the drug proceeds and the narcotics sold at the drug distribution point.

In addition to the above-mentioned drug point owners, enforcers and runners who also acted as sellers, the following individuals and others known and unknown to the Grand Jury, acted as sellers for the above described drug trafficking organization:

[32] **Alex Jose Babilonia-Torres, a.k.a. "Alex Moña"**, who would also carry and possess firearms in furtherance of the drug trafficking organization.

- [33] Luis Ernesto Gonzalez Moreno, a.k.a. "Poeta"
- [34] Luis M. Cortes Class, a.k.a. "Luis El Loco," a.k.a. "Luisito,";
- [35] Hector M. Rodriguez Soto, a.k.a. "Buddhita," a.k.a. "Budita"
- [36] Omar E. Mendoza Vidal, a.k.a. "Cuajo," a.k.a. "Cuajito"
- [37] Edwin Montijo Gonzalez, a.k.a. "Joel Sandwich"
- [38] Luis Centeno Ortiz
- [39] Edwin Mendoza Vargas, a.k.a. "Pito Chuli Mami," a.k.a. "Pito Chuli"
- [40] Ruben de Jesus-Ortiz, a.k.a. "Rubencito"
- [41] Jose Rivera Medina, a.k.a. "Pito Lllaga," a.k.a. "Pito Llagoso"
- [42] Jovanny Reyes Sanchez, a.k.a. "Jovanny El Lento"
- [43] Elizabeth Gerena Santiago, a.k.a. "Eli La Mona," a.k.a. "Eli La Pata," a.k.a. "Eli La Tigresa"
- [44] Kelvin Xavier Nieves-De Jesus, a.k.a. "Kelvin Blue," a.k.a. "Kelvin Azul"
- [45] Ruben Larregui Lopez, a.k.a. "Cusito"
- [46] Fernando J. Muniz Vega, a.k.a. "Joel Vega," a.k.a. "Joel Meao de Foca"
- [47] Emmanuel Salgado Gonzalez, a.k.a. "Mejico," a.k.a. "Mejicano," a.k.a. "Mexico," a.k.a. "Mexicano"
- [48] Danny Salgado Gonzalez, a.k.a. "Danny"
- [49] Luis A. Serrano Aponte, a.k.a. "Cachi"
- [50] Luis Angel Siragusa Soto, a.k.a. "El Gordo Siragusa," a.k.a. "Gordo Gemelo," a.k.a. "Gemelo Siragusa"
- [51] Carlos Jose Siragusa Soto, a.k.a. "Bebe Siragusa," a.k.a. "Bebe Marmol"
- [52] Christian O. Rodriguez Morales, a.k.a. "Christian El Lento"
- [53] Dennis Colon Laureano, a.k.a. "Buho"
- [54] Shaquille E. Rivera de Jesus
- [55] Ruth Emily Hernaiz Rojas, a.k.a. "Ruty", was a seller of Alprazolam (Xanax), and Oxycodone (Percocet).

F. Look-Outs/Facilitators:

"Look-outs" would conduct surveillance at strategic locations within the Villa Evangelina Public Housing Project in order to detect the presence of law enforcement personnel and members of rival gangs; they would receive payment from the sellers for their services as look-outs.

Some facilitators allowed the use of their apartments in the public housing project in order to process, store, and package narcotics for distribution. Some facilitators allowed

members of the drug trafficking organization to run and hide in their apartments to avoid police detection. Some facilitators would supply firearms, ammunition and/or firearms parts to members of the drug trafficking organization. Some facilitators would assist in laundering money to unlawfully enriching themselves and their coconspirators; and conceal and disguise the nature, location, source, ownership, and control of the proceeds of the money laundered.

In addition to those previously mentioned, the following co-defendants and others known and unknown to the Grand Jury at some point during their participation in the conspiracy did act as facilitators for the above-described drug trafficking organization:

[56] Luis Antonio Ibañez-Bello, a.k.a. "Gordo Ibanez," a.k.a. "El Bouncer", was a firearms, ammunition, and firearms parts supplier to members of the conspiracy;

[57] Jose Antonio Acevedo Nazario, a.k.a. "Sindicato", laundered money;

[58] Beatriz de Los Angeles Ortiz-Sanchez, a.k.a. "Bea", stored controlled substances

All in violation of Title 21, United States Code, §§ 841(a)(1), 860;

COUNT TWO

Aiding and Abetting in the Possession/Distribution of Heroin

Beginning on a date unknown, but no later than in or about the year 2000, and continuing up to and until the return of the instant Indictment, in the Municipality of Manati, District of Puerto Rico and within the jurisdiction of this Court,

[1] Carlos Gotay Guzman, a.k.a. "Moro," a.k.a. "Negro"

[2] Javier Gonzalez Perez, a.k.a. "Javier Tornillo"

[3] Reinaldo Colon Oliveras, a.k.a. "Tito Capao," a.k.a. "Tito"

[4] Roberto Maldonado Rodriguez, a.k.a. Roberto Maldonado Lopez, a.k.a. "Robert El Calvo," a.k.a. "Robert Cortes," a.k.a. "Gordo"

- [5] Carlos Vazquez Otero, a.k.a. "Carlos Misquin," a.k.a. "Carlos Tattoo"
- [6] Julio Alberto Rivera-Rodriguez, a.k.a. "Ito"
- [7] Eric O. Rosa-Ramos, a.k.a. "El Indio," a.k.a. "Eric El Siete"
- [8] Jorge L. Alicia Pagan, a.k.a. "Bebo Conejo"
- [9] Alfredo Virella Laureano, a.k.a. "Keko"
- [10] Christian Rodriguez Rivera, a.k.a. "Cuso," a.k.a. "Cuzo"
- [11] Jose M. Rivera Molina, a.k.a. "Bolillo"
- [12] Jonathan Ortiz Salgado, a.k.a. "Cochi," a.k.a. "Cochinola"
- [13] Juan Ramiro Fonseca-Otero, a.k.a. "Burro," a.k.a. "Burro de Quintana"
- [14] Hector Moreno Rivera, a.k.a. "Mickey Bay"
- [15] Anibal Garcia Quiñones, a.k.a. Anibal Junior Garcia, a.k.a. "Junior El Manco,"
a.k.a. "Junior Anibal"
- [16] Luis Daniel Rosa-Santiago, a.k.a. "Luisda"
- [17] Jose Resto-Laureano, a.k.a. "Piti," a.k.a. "Pitín"
- [18] Jaime Freytes Maldonado, a.k.a. "Micro"
- [19] Alexander Aviles Santiago, a.k.a. "Pipo," a.k.a. "Pipo El Mono"
- [20] Hector Colon Romero, a.k.a. "Coscu"
- [21] Ulises Soto Soto,
- [22] Jose Luis Ortiz Vega, a.k.a. "Bebo Chino," a.k.a. "Bebo Chinito,"
- [23] Christian Pantoja-Sanchez, a.k.a. "Wolf"
- [24] Ernie Vega Cruz, a.k.a. "Ernie Perla"
- [25] Jonathan Figueroa Hernandez, a.k.a. "Jonathan Mickey Mouse," a.k.a. "Mickey
Mouse,"
- [26] Roberto R. Valle Cordero, a.k.a. "Robert de Niro," a.k.a. "Robert El Jincho," a.k.a.
"Robert El Blanco," a.k.a. "Robertillo," a.k.a. "Robert El Primo de Checo",
- [27] Ramon J. Figueroa Colon, a.k.a. "Bengay," a.k.a. "El Visco"
- [28] Josue Salgado Pagan, a.k.a. "Tony Monaco," a.k.a. "Bambi"
- [29] Hector Earl Montilla-Battice, a.k.a. "Cacho"
- [30] Christian Torres Moran, a.k.a. "Palomita"
- [31] Jessie Vega Quiñones
- [32] Alex Jose Babilonia-Torres, a.k.a. "Alex Moña"
- [33] Luis Ernesto Gonzalez Moreno, a.k.a. "Poeta"
- [34] Luis M. Cortes Class, a.k.a. "Luis El Loco," a.k.a. "Luisito,";
- [35] Hector M. Rodriguez Soto, a.k.a. "Buddhita," a.k.a. "Budita"
- [36] Omar E. Mendoza Vidal, a.k.a. "Cuajo," a.k.a. "Cuajito"
- [37] Edwin Montijo Gonzalez, a.k.a. "Joel Sandwich"
- [38] Luis Centeno Ortiz

- [39] Edwin Mendoza Vargas, a.k.a. "Pito Chuli Mami," a.k.a. "Pito Chuli"
- [40] Ruben de Jesus-Ortiz, a.k.a. "Rubencito"
- [41] Jose Rivera Medina, a.k.a. "Pito Lllaga," a.k.a. "Pito Llagoso"
- [42] Jovanny Reyes Sanchez, a.k.a. "Jovanny El Lento"
- [43] Elizabeth Gerena Santiago, a.k.a. "Eli La Mona," a.k.a. "Eli La Pata," a.k.a. "Eli La Tigresa"
- [44] Kelvin Xavier Nieves-De Jesus, a.k.a. "Kelvin Blue," a.k.a. "Kelvin Azul"
- [45] Ruben Larregui Lopez, a.k.a. "Cusito"
- [46] Fernando J. Muniz Vega, a.k.a. "Joel Vega," a.k.a. "Joel Meao de Foca"
- [47] Emmanuel Salgado Gonzalez, a.k.a. "Mejico," a.k.a. "Mejicano," a.k.a. "Mexico," a.k.a. "Mexicano"
- [48] Danny Salgado Gonzalez, a.k.a. "Danny"
- [49] Luis A. Serrano Aponte, a.k.a. "Cachi"
- [50] Luis Angel Siragusa Soto, a.k.a. "El Gordo Siragusa," a.k.a. "Gordo Gemelo," a.k.a. "Gemelo Siragusa"
- [51] Carlos Jose Siragusa Soto, a.k.a. "Bebe Siragusa," a.k.a. "Bebe Marmol"
- [52] Christian O. Rodriguez Morales, a.k.a. "Christian El Lento"
- [53] Dennis Colon Laureano, a.k.a. "Buho"
- [54] Shaquille E. Rivera de Jesus
- [55] Ruth Emily Hernaiz Rojas, a.k.a. "Ruty"
- [56] Luis Antonio Ibañez-Bello, a.k.a. "Gordo Ibanez," a.k.a. "El Bouncer"
- [57] Jose Antonio Acevedo Nazario, a.k.a. "Sindicato"
- [58] Beatriz de Los Angeles Ortiz-Sanchez, a.k.a. "Bea"

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, within one thousand (1,000) feet of the real property comprising a public or private school and/or the Villa Evangelina Public Housing Project, a housing facility owned by a public housing authority. All in violation of Title 21, United States Code, §§ 841(a)(1), 860; and Title 18, United States Code, § 2.

COUNT THREE

Aiding and Abetting in the Possession/Distribution of Cocaine Base

Beginning on a date unknown, but no later than in or about the year 2000, and continuing up to and until the return of the instant Indictment, in the Municipality of Manati, District of Puerto Rico and within the jurisdiction of this Court,

- [1] Carlos Gotay Guzman, a.k.a. "Moro," a.k.a. "Negro"
- [2] Javier Gonzalez Perez, a.k.a. "Javier Tornillo"
- [3] Reinaldo Colon Oliveras, a.k.a. "Tito Capao," a.k.a. "Tito"
- [4] Roberto Maldonado Rodriguez, a.k.a. Roberto Maldonado Lopez, a.k.a. "Robert El Calvo," a.k.a. "Robert Cortes," a.k.a. "Gordo"
- [5] Carlos Vazquez Otero, a.k.a. "Carlos Misquin," a.k.a. "Carlos Tattoo"
- [6] Julio Alberto Rivera-Rodriguez, a.k.a. "Ito"
- [7] Eric O. Rosa-Ramos, a.k.a. "El Indio," a.k.a. "Eric El Siete"
- [8] Jorge L. Alicia Pagan, a.k.a. "Bebo Conejo"
- [9] Alfredo Virella Laureano, a.k.a. "Keko"
- [10] Christian Rodriguez Rivera, a.k.a. "Cuso," a.k.a. "Cuzo"
- [11] Jose M. Rivera Molina, a.k.a. "Bolillo"
- [12] Jonathan Ortiz Salgado, a.k.a. "Cochi," a.k.a. "Cochinola"
- [13] Juan Ramiro Fonseca-Otero, a.k.a. "Burro," a.k.a. "Burro de Quintana"
- [14] Hector Moreno Rivera, a.k.a. "Mickey Bay"
- [15] Anibal Garcia Quiñones, a.k.a. Anibal Junior Garcia, a.k.a. "Junior El Manco," a.k.a. "Junior Anibal"
- [16] Luis Daniel Rosa-Santiago, a.k.a. "Luisda"
- [17] Jose Resto-Laureano, a.k.a. "Piti," a.k.a. "Pitín"
- [18] Jaime Freytes Maldonado, a.k.a. "Micro"
- [19] Alexander Aviles Santiago, a.k.a. "Pipo," a.k.a. "Pipo El Mono"
- [20] Hector Colon Romero, a.k.a. "Coscu"
- [21] Ulises Soto Soto,
- [22] Jose Luis Ortiz Vega, a.k.a. "Bebo Chino," a.k.a. "Bebo Chinito,"
- [23] Christian Pantoja-Sanchez, a.k.a. "Wolf"
- [24] Ernie Vega Cruz, a.k.a. "Ernie Perla"
- [25] Jonathan Figueroa Hernandez, a.k.a. "Jonathan Mickey Mouse," a.k.a. "Mickey Mouse,"

- [26] Roberto R. Valle Cordero, a.k.a. "Robert de Niro," a.k.a. "Robert El Jincho," a.k.a. "Robert El Blanco," a.k.a. "Robertillo," a.k.a. "Robert El Primo de Checo",
- [27] Ramon J. Figueroa Colon, a.k.a. "Bengay," a.k.a. "El Visco"
- [28] Josue Salgado Pagan, a.k.a. "Tony Monaco," a.k.a. "Bambi"
- [29] Hector Earl Montilla-Battice, a.k.a. "Cacho"
- [30] Christian Torres Moran, a.k.a. "Palomita"
- [31] Jessie Vega Quiñones
- [32] Alex Jose Babilonia-Torres, a.k.a. "Alex Moña"
- [33] Luis Ernesto Gonzalez Moreno, a.k.a. "Poeta"
- [34] Luis M. Cortes Class, a.k.a. "Luis El Loco," a.k.a. "Luisito,";
- [35] Hector M. Rodriguez Soto, a.k.a. "Buddhita," a.k.a. "Budita"
- [36] Omar E. Mendoza Vidal, a.k.a. "Cuajo," a.k.a. "Cuajito"
- [37] Edwin Montijo Gonzalez, a.k.a. "Joel Sandwich"
- [38] Luis Centeno Ortiz
- [39] Edwin Mendoza Vargas, a.k.a. "Pito Chuli Mami," a.k.a. "Pito Chuli"
- [40] Ruben de Jesus-Ortiz, a.k.a. "Rubencito"
- [41] Jose Rivera Medina, a.k.a. "Pito Lllaga," a.k.a. "Pito Llagoso"
- [42] Jovanny Reyes Sanchez, a.k.a. "Jovanny El Lento"
- [43] Elizabeth Gerena Santiago, a.k.a. "Eli La Mona," a.k.a. "Eli La Pata," a.k.a. "Eli La Tigresa"
- [44] Kelvin Xavier Nieves-De Jesus, a.k.a. "Kelvin Blue," a.k.a. "Kelvin Azul"
- [45] Ruben Larregui Lopez, a.k.a. "Cusito"
- [46] Fernando J. Muniz Vega, a.k.a. "Joel Vega," a.k.a. "Joel Meao de Foca"
- [47] Emmanuel Salgado Gonzalez, a.k.a. "Mejico," a.k.a. "Mejicano," a.k.a. "Mexico," a.k.a. "Mexicano"
- [48] Danny Salgado Gonzalez, a.k.a. "Danny"
- [49] Luis A. Serrano Aponte, a.k.a. "Cachi"
- [50] Luis Angel Siragusa Soto, a.k.a. "El Gordo Siragusa," a.k.a. "Gordo Gemelo," a.k.a. "Gemelo Siragusa"
- [51] Carlos Jose Siragusa Soto, a.k.a. "Bebe Siragusa," a.k.a. "Bebe Marmol"
- [52] Christian O. Rodriguez Morales, a.k.a. "Christian El Lento"
- [53] Dennis Colon Laureano, a.k.a. "Buho"
- [54] Shaquille E. Rivera de Jesus
- [55] Ruth Emily Hernaiz Rojas, a.k.a. "Ruty"
- [56] Luis Antonio Ibañez-Bello, a.k.a. "Gordo Ibanez," a.k.a. "El Bouncer"
- [57] Jose Antonio Acevedo Nazario, a.k.a. "Sindicato"
- [58] Beatriz de Los Angeles Ortiz-Sanchez, a.k.a. "Bea"

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute two hundred and eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base (Crack), a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of the real property comprising a public or private school and/or the Villa Evangelina Public Housing Project, a housing facility owned by a public housing authority. All in violation of Title 21, United States Code, §§ 841(a)(1), 860; and Title 18, United States Code, § 2.

COUNT FOUR

Aiding and Abetting in the Possession/Distribution of Cocaine

Beginning on a date unknown, but no later than in or about the year 2000, and continuing up to and until the return of the instant Indictment, in the Municipality of Manati, District of Puerto Rico and within the jurisdiction of this Court,

- [1] **Carlos Gotay Guzman, a.k.a. "Moro," a.k.a. "Negro"**
- [2] **Javier Gonzalez Perez, a.k.a. "Javier Tornillo"**
- [3] **Reinaldo Colon Oliveras, a.k.a. "Tito Capao," a.k.a. "Tito"**
- [4] **Roberto Maldonado Rodriguez, a.k.a. Roberto Maldonado Lopez, a.k.a. "Robert El Calvo," a.k.a. "Robert Cortes," a.k.a. "Gordo"**
- [5] **Carlos Vazquez Otero, a.k.a. "Carlos Misquin," a.k.a. "Carlos Tattoo"**
- [6] **Julio Alberto Rivera-Rodriguez, a.k.a. "Ito"**
- [7] **Eric O. Rosa-Ramos, a.k.a. "El Indio," a.k.a. "Eric El Siete"**
- [8] **Jorge L. Alicia Pagan, a.k.a. "Bebo Conejo"**
- [9] **Alfredo Virella Laureano, a.k.a. "Keko"**
- [10] **Christian Rodriguez Rivera, a.k.a. "Cuso," a.k.a. "Cuzo"**
- [11] **Jose M. Rivera Molina, a.k.a. "Bolillo"**
- [12] **Jonathan Ortiz Salgado, a.k.a. "Cochi," a.k.a. "Cochinola"**
- [13] **Juan Ramiro Fonseca-Otero, a.k.a. "Burro," a.k.a. "Burro de Quintana"**
- [14] **Hector Moreno Rivera, a.k.a. "Mickey Bay"**
- [15] **Anibal Garcia Quiñones, a.k.a. Anibal Junior Garcia, a.k.a. "Junior El Manco,"**

a.k.a. "Junior Anibal"

[16] Luis Daniel Rosa-Santiago, a.k.a. "Luisda"

[17] Jose Resto-Laureano, a.k.a. "Piti," a.k.a. "Pitin"

[18] Jaime Freytes Maldonado, a.k.a. "Micro"

[19] Alexander Aviles Santiago, a.k.a. "Pipo," a.k.a. "Pipo El Mono"

[20] Hector Colon Romero, a.k.a. "Coscu"

[21] Ulises Soto Soto,

[22] Jose Luis Ortiz Vega, a.k.a. "Bebo Chino," a.k.a. "Bebo Chinito,"

[23] Christian Pantoja-Sanchez, a.k.a. "Wolf"

[24] Ernie Vega Cruz, a.k.a. "Ernie Perla"

[25] Jonathan Figueroa Hernandez, a.k.a. "Jonathan Mickey Mouse," a.k.a. "Mickey Mouse,"

[26] Roberto R. Valle Cordero, a.k.a. "Robert de Niro," a.k.a. "Robert El Jincho," a.k.a. "Robert El Blanco," a.k.a. "Robertillo," a.k.a. "Robert El Primo de Checo",

[27] Ramon J. Figueroa Colon, a.k.a. "Bengay," a.k.a. "El Visco"

[28] Josue Salgado Pagan, a.k.a. "Tony Monaco," a.k.a. "Bambi"

[29] Hector Earl Montilla-Battice, a.k.a. "Cacho"

[30] Christian Torres Moran, a.k.a. "Palomita"

[31] Jessie Vega Quiñones

[32] Alex Jose Babilonia-Torres, a.k.a. "Alex Moña"

[33] Luis Ernesto Gonzalez Moreno, a.k.a. "Poeta"

[34] Luis M. Cortes Class, a.k.a. "Luis El Loco," a.k.a. "Luisito,";

[35] Hector M. Rodriguez Soto, a.k.a. "Buddhita," a.k.a. "Budita"

[36] Omar E. Mendoza Vidal, a.k.a. "Cuajo," a.k.a. "Cuajito"

[37] Edwin Montijo Gonzalez, a.k.a. "Joel Sandwich"

[38] Luis Centeno Ortiz

[39] Edwin Mendoza Vargas, a.k.a. "Pito Chuli Mami," a.k.a. "Pito Chuli"

[40] Ruben de Jesus-Ortiz, a.k.a. "Rubencito"

[41] Jose Rivera Medina, a.k.a. "Pito Lllaga," a.k.a. "Pito Llagoso"

[42] Jovanny Reyes Sanchez, a.k.a. "Jovanny El Lento"

[43] Elizabeth Gerena Santiago, a.k.a. "Eli La Mona," a.k.a. "Eli La Pata," a.k.a. "Eli La Tigresa"

[44] Kelvin Xavier Nieves-De Jesus, a.k.a. "Kelvin Blue," a.k.a. "Kelvin Azul"

[45] Ruben Larregui Lopez, a.k.a. "Cusito"

[46] Fernando J. Muniz Vega, a.k.a. "Joel Vega," a.k.a. "Joel Meao de Foca"

[47] Emmanuel Salgado Gonzalez, a.k.a. "Mejico," a.k.a. "Mejicano," a.k.a. "Mexico," a.k.a. "Mexicano"

- [48] **Danny Salgado Gonzalez, a.k.a. "Danny"**
- [49] **Luis A. Serrano Aponte, a.k.a. "Cachi"**
- [50] **Luis Angel Siragusa Soto, a.k.a. "El Gordo Siragusa," a.k.a. "Gordo Gemelo," a.k.a. "Gemelo Siragusa"**
- [51] **Carlos Jose Siragusa Soto, a.k.a. "Bebe Siragusa," a.k.a. "Bebe Marmol"**
- [52] **Christian O. Rodriguez Morales, a.k.a. "Christian El Lento"**
- [53] **Dennis Colon Laureano, a.k.a. "Buho"**
- [54] **Shaquille E. Rivera de Jesus**
- [55] **Ruth Emily Hernaiz Rojas, a.k.a. "Ruty"**
- [56] **Luis Antonio Ibañez-Bello, a.k.a. "Gordo Ibanez," a.k.a. "El Bouncer"**
- [57] **Jose Antonio Acevedo Nazario, a.k.a. "Sindicato"**
- [58] **Beatriz de Los Angeles Ortiz-Sanchez, a.k.a. "Bea"**

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of the real property comprising a public or private school and/or the Villa Evangelina Public Housing Project, a housing facility owned by a public housing authority. All in violation of Title 21, United States Code, §§ 841(a)(1), 860; and Title 18, United States Code, § 2.

COUNT FIVE

Aiding and Abetting in the Distribution of Marijuana

Beginning on a date unknown, but no later than in or about the year 2000, and continuing up to and until the return of the instant Indictment, in the Municipality of Manati, District of Puerto Rico and within the jurisdiction of this Court,

- [1] **Carlos Gotay Guzman, a.k.a. "Moro," a.k.a. "Negro"**
- [2] **Javier Gonzalez Perez, a.k.a. "Javier Tornillo"**
- [3] **Reinaldo Colon Oliveras, a.k.a. "Tito Capao," a.k.a. "Tito"**

[4] Roberto Maldonado Rodriguez, a.k.a. Roberto Maldonado Lopez, a.k.a. "Robert El Calvo," a.k.a. "Robert Cortes," a.k.a. "Gordo"

[5] Carlos Vazquez Otero, a.k.a. "Carlos Misquin," a.k.a. "Carlos Tattoo"

[6] Julio Alberto Rivera-Rodriguez, a.k.a. "Ito"

[7] Eric O. Rosa-Ramos, a.k.a. "El Indio," a.k.a. "Eric El Siete"

[8] Jorge L. Alicia Pagan, a.k.a. "Bebo Conejo"

[9] Alfredo Virella Laureano, a.k.a. "Keko"

[10] Christian Rodriguez Rivera, a.k.a. "Cuso," a.k.a. "Cuzo"

[11] Jose M. Rivera Molina, a.k.a. "Bolillo"

[12] Jonathan Ortiz Salgado, a.k.a. "Cochi," a.k.a. "Cochinola"

[13] Juan Ramiro Fonseca-Otero, a.k.a. "Burro," a.k.a. "Burro de Quintana"

[14] Hector Moreno Rivera, a.k.a. "Mickey Bay"

[15] Anibal Garcia Quiñones, a.k.a. Anibal Junior Garcia, a.k.a. "Junior El Manco," a.k.a. "Junior Anibal"

[16] Luis Daniel Rosa-Santiago, a.k.a. "Luisda"

[17] Jose Resto-Laureano, a.k.a. "Piti," a.k.a. "Pitín"

[18] Jaime Freytes Maldonado, a.k.a. "Micro"

[19] Alexander Aviles Santiago, a.k.a. "Pipo," a.k.a. "Pipo El Mono"

[20] Hector Colon Romero, a.k.a. "Coscu"

[21] Ulises Soto Soto,

[22] Jose Luis Ortiz Vega, a.k.a. "Bebo Chino," a.k.a. "Bebo Chinito,"

[23] Christian Pantoja-Sanchez, a.k.a. "Wolf"

[24] Ernie Vega Cruz, a.k.a. "Ernie Perla"

[25] Jonathan Figueroa Hernandez, a.k.a. "Jonathan Mickey Mouse," a.k.a. "Mickey Mouse,"

[26] Roberto R. Valle Cordero, a.k.a. "Robert de Niro," a.k.a. "Robert El Jincho," a.k.a. "Robert El Blanco," a.k.a. "Robertillo," a.k.a. "Robert El Primo de Checo",

[27] Ramon J. Figueroa Colon, a.k.a. "Bengay," a.k.a. "El Visco"

[28] Josue Salgado Pagan, a.k.a. "Tony Monaco," a.k.a. "Bambi"

[29] Hector Earl Montilla-Battice, a.k.a. "Cacho"

[30] Christian Torres Moran, a.k.a. "Palomita"

[31] Jessie Vega Quiñones

[32] Alex Jose Babilonia-Torres, a.k.a. "Alex Moña"

[33] Luis Ernesto Gonzalez Moreno, a.k.a. "Poeta"

[34] Luis M. Cortes Class, a.k.a. "Luis El Loco," a.k.a. "Luisito,";

[35] Hector M. Rodriguez Soto, a.k.a. "Buddhita," a.k.a. "Budita"

[36] Omar E. Mendoza Vidal, a.k.a. "Cuajo," a.k.a. "Cuajito"

- [37] Edwin Montijo Gonzalez, a.k.a. "Joel Sandwich"
- [38] Luis Centeno Ortiz
- [39] Edwin Mendoza Vargas, a.k.a. "Pito Chuli Mami," a.k.a. "Pito Chuli"
- [40] Ruben de Jesus-Ortiz, a.k.a. "Rubencito"
- [41] Jose Rivera Medina, a.k.a. "Pito Lllaga," a.k.a. "Pito Llagoso"
- [42] Jovanny Reyes Sanchez, a.k.a. "Jovanny El Lento"
- [43] Elizabeth Gerena Santiago, a.k.a. "Eli La Mona," a.k.a. "Eli La Pata," a.k.a. "Eli La Tigresa"
- [44] Kelvin Xavier Nieves-De Jesus, a.k.a. "Kelvin Blue," a.k.a. "Kelvin Azul"
- [45] Ruben Larregui Lopez, a.k.a. "Cusito"
- [46] Fernando J. Muniz Vega, a.k.a. "Joel Vega," a.k.a. "Joel Meao de Foca"
- [47] Emmanuel Salgado Gonzalez, a.k.a. "Mejico," a.k.a. "Mejicano," a.k.a. "Mexico," a.k.a. "Mexicano"
- [48] Danny Salgado Gonzalez, a.k.a. "Danny"
- [49] Luis A. Serrano Aponte, a.k.a. "Cachi"
- [50] Luis Angel Siragusa Soto, a.k.a. "El Gordo Siragusa," a.k.a. "Gordo Gemelo," a.k.a. "Gemelo Siragusa"
- [51] Carlos Jose Siragusa Soto, a.k.a. "Bebe Siragusa," a.k.a. "Bebe Marmol"
- [52] Christian O. Rodriguez Morales, a.k.a. "Christian El Lento"
- [53] Dennis Colon Laureano, a.k.a. "Buho"
- [54] Shaquille E. Rivera de Jesus
- [55] Ruth Emily Hernaiz Rojas, a.k.a. "Ruty"
- [56] Luis Antonio Ibañez-Bello, a.k.a. "Gordo Ibanez," a.k.a. "El Bouncer"
- [57] Jose Antonio Acevedo Nazario, a.k.a. "Sindicato"
- [58] Beatriz de Los Angeles Ortiz-Sanchez, a.k.a. "Bea"

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, within one thousand (1,000) feet of the real property comprising a public or private school and/or the Villa Evangelina Public Housing Project, a housing facility owned by a public housing authority. All in violation of Title 21, United States Code, §§ 841(a)(1), 860; and Title 18, United States Code, § 2.

COUNT SIX

Possession in Furtherance of a Drug Trafficking Crime

Beginning on a date unknown, but no later than in or about the year 2000, and continuing up to and until the return of the instant Indictment, in the Municipality of Manati, District of Puerto Rico and within the jurisdiction of this Court,

- [1] **Carlos Gotay Guzman, a.k.a. "Moro," a.k.a. "Negro"**
- [2] **Javier Gonzalez Perez, a.k.a. "Javier Tornillo"**
- [3] **Reinaldo Colon Oliveras, a.k.a. "Tito Capao," a.k.a. "Tito"**
- [4] **Roberto Maldonado Rodriguez, a.k.a. Roberto Maldonado Lopez, a.k.a. "Robert El Calvo," a.k.a. "Robert Cortes," a.k.a. "Gordo"**
- [5] **Carlos Vazquez Otero, a.k.a. "Carlos Misquin," a.k.a. "Carlos Tattoo"**
- [6] **Julio Alberto Rivera-Rodriguez, a.k.a. "Ito"**
- [8] **Jorge L. Alicia Pagan, a.k.a. "Bebo Conejo"**
- [9] **Alfredo Virella Laureano, a.k.a. "Keko"**
- [10] **Christian Rodriguez Rivera, a.k.a. "Cuso," a.k.a. "Cuzo"**
- [11] **Jose M. Rivera Molina, a.k.a. "Bolillo"**
- [12] **Jonathan Ortiz Salgado, a.k.a. "Cochi," a.k.a. "Cochinola"**
- [14] **Hector Moreno Rivera, a.k.a. "Mickey Bay"**
- [18] **Jaime Freytes Maldonado, a.k.a. "Micro"**
- [19] **Alexander Aviles Santiago, a.k.a. "Pipo," a.k.a. "Pipo El Mono"**
- [20] **Hector Colon Romero, a.k.a. "Coscu"**
- [26] **Roberto R. Valle Cordero, a.k.a. "Robert de Niro," a.k.a. "Robert El Jincho," a.k.a. "Robert El Blanco," a.k.a. "Robertillo," a.k.a. "Robert El Primo de Checo",**
- [31] **Jessie Vega Quiñones**
- [32] **Alex Jose Babilonia-Torres, a.k.a. "Alex Moña"**

the defendants herein, aiding and abetting each other, did knowingly and unlawfully possess firearms as that term is defined in Title 18, United States Code, Section 921(a)(3), in furtherance of a drug trafficking crime as charged in counts (1) through (5) of the instant Indictment. All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT SEVEN
Conspiracy to Commit Money Laundering

Beginning on a date unknown, but no later than in or about the year 2006 and ending on or about the date of this indictment, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court, defendants

[57] Jose Antonio Acevedo Nazario, a.k.a. "Sindicato"
[59] Jose O. Padilla Flores, a.k.a. "Landi"

did knowingly combine, conspire, and agree with each other and other persons both known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including 21, United States Code, Sections 841(a)(1), 846, 952, 960, and 963, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) to knowingly conduct and attempt to conduct financial transactions affecting

interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substance Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 841(a)(1), 846, 952, 960, and 963, knowing that the transactions were designed in whole or in part to avoid a transaction reporting requirement under Federal law, and that while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

OBJECT OF THE CONSPIRACY

It was object of the conspiracy, among others, for the defendants and their co-conspirators to engage in money laundering for the purpose of (1) unlawfully enriching themselves and their coconspirators; and (2) concealing and disguising the nature, location, source, ownership, and control of the proceeds of the money laundered.

MANNER AND MEANS USED IN FURTHERANCE OF THE CONSPIRACY

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

1. Defendants, and co-conspirators known and unknown to the Grand Jury, would purchase and attempt to purchase real estate and other assets in the name of person(s), known and unknown to the Grand Jury, and in doing so, would misrepresent the source of the money

used to pay, the manner of payment, and the true owners, among others.

2. The Defendants, and co-conspirators known and unknown to the Grand Jury, would utilize nominee bank accounts to deposit narcotics proceeds, and in turn make payments for goods with checks or cash, in order to: (a) conceal the true ownership of the assets; (b) conceal the source of the funds; and (c) avoid tracing by financial institutions and civil and criminal authorities, and protect their interest in the properties.

3. The Defendants, and co-conspirators known and unknown to the Grand Jury, would conduct financial transactions, including, but not limited to, conducting and facilitating transactions on behalf of Cintron Handyman Professional Services, Inc., and the purchase or transfer of real estate.

4. The Defendants, and co-conspirators known and unknown to the Grand Jury, would store proceeds from the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in controlled substances at JP Electrical Contractor, Inc.

All in violation of Title 18, United States Code, Sections 1956(h).

COUNT EIGHT
Conspiracy to Commit Money Laundering

Beginning on a date unknown, but no later than in or about January 2013, and ending on or about the date of this indictment, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court, defendants

[3] Reinaldo Colon Oliveras, a.k.a. "Tito Capao," a.k.a. "Tito"
[60] Jorge Rivera Sanchez
[61] Leslie Delgado Diaz

did knowingly combine, conspire, and agree with each other and other persons both known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including 21, United States Code, Sections 841(a)(1), 846, 952, 960, and 963, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substance Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 841(a)(1), 846, 952, 960, and 963,

knowing that the transactions were designed in whole or in part to avoid a transaction reporting requirement under Federal law, and that while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

OBJECT OF THE CONSPIRACY

It was object of the conspiracy, among others, for the defendants and their co-conspirators to engage in money laundering for the purpose of (1) unlawfully enriching themselves and their coconspirators; and (2) concealing and disguising the nature, location, source, ownership, and control of the proceeds of the money laundered.

MANNER AND MEANS USED IN FURTHERANCE OF THE CONSPIRACY

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

1. Defendants would purchase and attempt to rent or purchase real estate and/or other assets, such as vehicles, in the name of person(s), known and unknown to the Grand Jury, and in doing so, would misrepresent the source of the money used to pay, the manner of payment, and the true owners, among others.

2. The Defendants would utilize nominee bank accounts to deposit narcotics proceeds, or utilize bulk cash, and in turn make payments for goods with checks or cash, in order to: (a) conceal the true ownership of the assets; (b) conceal the source of the funds; and (c) avoid

tracing by financial institutions and civil and criminal authorities, and protect their interest in the properties.

3. The Defendants would create corporations, including J & L Oil Company, LLC. to buy the rights to operate gas stations in or around the area of Kissimmee, Florida to hide the true owner, and source of money.

4. It was further part of the manners and means of the conspiracy that the coconspirators would commingle drug trafficking proceeds with monies derived from business establishments.

5. The Defendants would conduct financial transactions including, but not limited to, the renting of real estate properties, acquiring vehicles, and using a personal checking account for the deposit and withdrawal of drug proceeds.

All in violation of Title 18, United States Code, Sections 1956(h).

COUNT NINE
Money Laundering
18 U.S.C. §§ 1956(a)

Beginning on a date unknown, but no later than in or about the year 2013, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court, the defendant

[28] Josue Salgado Pagan, a.k.a. "Tony Monaco," a.k.a. "Bambi"

did knowingly commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate

commerce, including, but not limited to, the acquisition of real estate on behalf of World Magic Detailing, LLC, and the deposit and withdrawal of drug proceeds, which transactions involved the proceeds of specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including 21, United States Code, Sections 841(a)(1), 846, 952, 960, and 963, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, including, but not limited to, the creation of World Magic Detailing, LLC to acquire real estate properties and to deposit and withdraw drug proceeds, which transactions involved the proceeds of specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substance Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including Title 21, United States Code, Sections 841(a)(1), 846, 952, 960, and 963, knowing that the transactions were designed in whole or in part to avoid a transaction reporting requirement under Federal law, and that while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B).

COUNT TEN
Money Laundering
18 U.S.C. §§ 1957

On or about April 28, 2014, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court, the defendant

[28] Josue Salgado Pagan, a.k.a. "Tony Monaco," a.k.a. "Bambi"

did knowingly engage and attempt to engage in a monetary transaction by, through, or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is the deposit of U.S. currency for a down payment on real estate, such property having been derived from a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), set forth in Title 18, United States Code, Section 1961, punishable under any law of the United States including 21, United States Code, Sections 841(a)(1), 846, 952, 960, and 963.

All in violation of Title 18, United States Code, Sections 1957.

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NARCOTICS AND MONEY LAUNDERING FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged in Counts One (1) through Ten (10) of this Indictment, pursuant to Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982(a)(1), each defendant who is convicted of one or more of the offenses set forth in said counts, shall forfeit to the United States the following property:

a. Any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses (Title 21, United States Code, Section 853); any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses (Title 21, United States Code, Section 853); and any property, real or personal, involved in such offense, and any property traceable to such property (Title 18, United States Code, Section 1956).

b. A sum of money equal to the total amount of money involved in each offense, or conspiracy to commit such offense, for which the defendant is convicted, to wit: thirty million dollars (\$30,000,000.00) in U.S. Currency. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

c. All that lot or parcel of land, together with its building, appurtenances, improvements, fixtures, attachments and easements, located at Condominio Marina Lanais, Apartment 122, in the Municipality of Fajardo, more particularly described as:

HORIZONTAL PROPERTY: URBAN: Individualized efficiency type unit of reinforced concrete and concrete blocks situated in the Municipality of Fajardo, Puerto Rico, identified with the number 122, located on the ground floor of the building known as Marina Lanais. This unit has an area of approximately 640.44 square feet, and its bounded on the NORTH, by the interior wall which separates it from the common hallway; on the SOUTH, by the terrace railing which separates it from the observation deck; on the WEST, by the interior which separates it from unit number 121; and on the EAST, by the exterior wall of the building. The entrance of this unit communicates with a common use hallway and the common use stairways, elevators and grounds that give access to the State Road number 987. This apartment consist of an entrance with a walk-in closet and kitchenette; a combination living-dining-sleeping area; a

bathroom; a dresser area with a closet; and a terrace. This apartment has appurtenant to it .7052% of the common elements of the property, a covered parking space identified with the number of this unit.

d. All that lot or parcel of land, together with its building, appurtenances, improvements, fixtures, attachments and easements, located at 2815 Autumn Breeze Way in Kissimmee, FL 34744, more particularly described as:

Lot 173, of NORTH POINT - PHASE 2A, according to the Plat thereof, as recorded in Plat Book 22, Page 111, of the Public Records of Osceola County, Florida.

e. All that lot or parcel of land, together with its building, appurtenances, improvements, fixtures, attachments and easements, located at Coto Sur Ward in the Municipality of Manatí, Puerto Rico, more particularly described as:

PROPERTY: 6805 RECORDED AT PAGE 141 OF VOLUME 166 OF
MANATÍ, REGISTRY OF THE PROPERTY OF MANATÍ.

RÚSTIC: Lot Number 2: Located at Coto Sur Ward in the Municipality of Manatí, Puerto Rico, with an area of 1160.62 square meters, equivalent to 0.2953 cuerdas. Bounding by the NORTH and WEST, in 21.62 meters and 56.82 meters, respectively, with the main land from where it is segregated; by the EAST, in 55.92 with Santiago Lebrón; by the SOUTH, in 19.72 meters with road 670, from which its separate by a strip of land segregated from the main land and dedicated to public use, said strip of land has an area of 64.56 square meters .

TRACT:

It is segregate from property number 2146 recorded at page 247 of volume 45 of Manatí.

f. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), each defendant shall forfeit substitute property, up to the value of the amount described in paragraph one (1), if, by any act or omission of the defendant, the property described in paragraph one (1), or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the

jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.


All in accordance with Title 18, United States Code, Sections 853 and 982(a)(1) and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

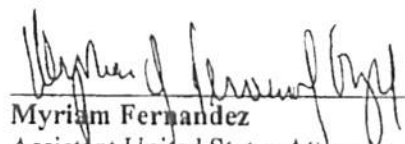
TRUE BILL

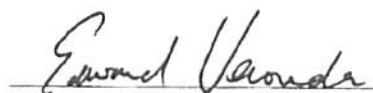
FOREPERSON

Date: march 4th, 2015

ROSA EMILIA RODRIGUEZ-VELEZ
United States Attorney



José Ruiz-Santiago
Assistant United States Attorney
Chief Criminal Division

Myriam Fernandez
Assistant United States Attorney
Deputy Chief, Narcotics Unit

Edward Veronda
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Narcotics Unit