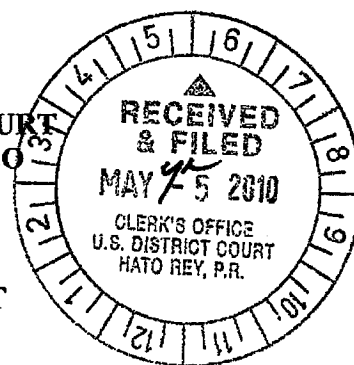


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO



UNITED STATES OF AMERICA,

Plaintiff,

v.

- [1] HAROLD FIGUEROA-SANCHEZ, a.k.a. "Casco", "Gordo", "Cabeza",
(Counts ONE through SIX)
- [2] ANIBAL ESCOBAR-SANCHEZ, a.k.a. "NBA", "Siete Pisos",
(Counts ONE through SIX)
- [3] JOSE GONZALEZ-GARCIA a.k.a "Fafi",
(Counts ONE through SIX)
- [4] JOSUE AVILES-PEREZ, a.k.a. "El Gordo",
(Counts ONE through SIX)
- [5] JOSE G. MORENO-JIMENEZ, a.k.a. "Willy Moreno",
(Counts ONE through SIX)
- [6] JEAN C. PIZARRO-MORALES, a.k.a. "Jean Ca", "Puffy",
(Counts ONE through SIX)
- [7] JOHN DOE #1, a.k.a. "Jason", "Arrabal",
(Counts ONE through SIX)



- [8] JIMMY ORTIZ-ORTIZ,
(Counts ONE through SIX)
- [9] EUGENIO GARCIA-PELLOT, a.k.a. "Crunchy", "Geño",
(Counts ONE through SIX)
- [10] EMANUEL ARCE-GONZALEZ, a.k.a. "Conan",
(Counts ONE through SIX)
- [11] CARLOS PIZARRO-MORALES, a.k.a. "Bondy",
(Counts ONE through SIX)
- [12] JOHN DOE #2, a.k.a. "Chango",
(Counts ONE through SIX)



INDICTMENT

CRIMINAL NO. 10-175 (PG)

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(o)

Narcotics Forfeiture Allegation
Title 21, United States Code, § 853 and Rule 32.2(a) F.R.C.P.

(SIX COUNTS)

[13] VICTOR ROMAN-RIVERA, a.k.a. "Tito G",
(Counts ONE through SIX)

[14] WILFREDO DIAZ-DE JESUS, a.k.a.
"Wika", "Yankee",
(Counts ONE through SIX)

[15] DIEGO SILVA-SANTOS, a.k.a. "Dieguito",
"Diamond",
(Counts ONE through SIX)

[16] ANGEL "LNU", a.k.a. "El Flaco"
(Counts ONE through SIX)



[17] MIGUEL SERRANO-MATTA, a.k.a. "Tori",
"Estropiao",
(Counts ONE through SIX)

[18] RICHARD MORALES CRUZ, a.k.a. "Muni",
(Counts ONE through SIX)

[19] RAUL OLIVERA-LANDRAU, a.k.a. "Pupe",
(Counts ONE through SIX)

[20] PABLO BELTRAN-RODRIGUEZ, a.k.a.
"Mejicano",
(Counts ONE through SIX)

[21] ELIEZER FIGUEROA-FARGAS, a.k.a.
"Eli", "Fifty Cent", "Pepa", "Negrura",
(Counts ONE through SIX)

[22] SAUL HERNANDEZ-COSS, a.k.a. "Tachu",
"Tachuela", "Huesos",
(Counts ONE through SIX)

[23] JUAN SERRANO-CHAPMAN, a.k.a. "Tony
Presidio", "Presi",
(Counts ONE through SIX)

[24] CARLOS PEREZ-CIRINO, a.k.a. "Charlie
Drex"
(Counts ONE through SIX)

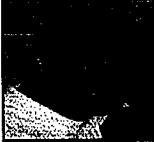
[25] JULIO CRUZ-GARCIA, a.k.a. "Julito",
"Casper",
(Counts ONE through SIX)

[26] LUIS D. MUÑOZ-FLORES, a.k.a. "Jadiel",
"Tio",
(Counts ONE through SIX)

[27] OMAR D. NAVARRO-HERNANDEZ, a.k.a.
"El Flow", "Boqui",
(Counts ONE through SIX)

[28] RAFAEL PIZARRO-GARCIA, a.k.a. "Rafi",
"Rafi Bear",
(Counts ONE through SIX)

[29] CARLOS FIGUEROA-PIZARRO, a.k.a.

- "Carlitos", "Papn",**
(Counts ONE through SIX)
[30] ANTHONY MUÑOZ-FLORES, a.k.a.
"Paparazzi",
(Counts ONE through SIX)
[31] ROBERTO SANTANA-RIVERA, a.k.a.
"Impostor",
(Counts ONE through SIX)
[32] JESUS F. DE JESUS RIVERA, a.k.a.
"Chino",
(Counts ONE through SIX)
[33] LUIS D. SANTIAGO-PIZARRO, a.k.a.
"Cherrybum", "Cherry Bomb",
(Counts ONE through SIX)
[34] RAFAEL J. FLORES QUIÑONES, a.k.a.
"Popeye",
(Counts ONE through SIX)
[35] MIGUEL HERNANDEZ-MERCEDES, a.k.a.
"Guelo", "Oscar",
(Counts ONE through SIX)
[36] RUBEN RODRIGUEZ-ADORNO, a.k.a.
"Eja", "Nene", ".38", "Full",
(Counts ONE through SIX)
[37] EDGARDO VEGA CANALES, a.k.a. "Blim
Blim",
(Counts ONE through SIX)
[38] MIGUEL CASTRO-MURIEL, a.k.a.
"Pancho",
(Counts ONE through SIX)
[39] JOHN DOE#3, a.k.a. "Pichie",
(Counts ONE through SIX)
- 
- [40] JANNY LOPEZ-CALO, a.k.a. "Pelucho",**
(Counts ONE through SIX)
[41] VINCE MELENDEZ-"LNU", a.k.a. "Mingo",
(Counts ONE through SIX)
[42] VICTOR CABRERA-PASTRANA, a.k.a.
"Vitin Trampa",
(Counts ONE through SIX)
[43] WILFRED ORTIZ-MELECIO, a.k.a. "Falla
Guira",
(Counts ONE through SIX)
[44] EMILIO CORRETJER-RODRIGUEZ, a.k.a.
"Millo",
(Counts ONE through SIX)
[45] JOHN DOE#4, a.k.a. "Chupi",
(Counts ONE through SIX)



[46] ERICK LOPEZ-CALO, a.k.a. "Capacete",
(Counts ONE through SIX)

[47] JONATHAN BUSTER-TORRES,
(Counts ONE through SIX)

[48] LUIS DIAZ-CRUZ, a.k.a. "Almeja",
(Counts ONE through SIX)

[49] EMANUEL FORTI-LOPEZ, a.k.a. "Manuel",
(Counts ONE through SIX)

[50] XAVIER "LNU", a.k.a. "Barbie",
(Counts ONE through SIX)



[51] FRANCISCO "LNU", a.k.a. "Bejuco",
(Counts ONE through SIX)



[52] RICHARD CESAREO-GONZALEZ, a.k.a.
"Bubu",

(Counts ONE through SIX)

[53] JONATHAN SANTIAGO, a.k.a. "Titi West",
(Counts ONE through SIX)

[54] JOHN DOE #5, a.k.a. "Saca Crippy",
(Counts ONE through SIX)



[55] CISKOULA GARCIA, a.k.a. "Zorillo",
"Zorri",

(Counts ONE through SIX)

[56] JESUS M. TORRES-COSS, a.k.a. "Popo",
(Counts ONE through SIX)

[57] JOHN DOE #6, a.k.a. "Murmu",
(Counts ONE through SIX)



[58] FRANCIS GARCIA "LNU",
(Counts ONE through SIX)

[59] RAUL HERNANDEZ-COSS, a.k.a. "Baby",
(Counts ONE through SIX)

[60] JOHN DOE #7, a.k.a. "Antiguo",
(Counts ONE through SIX)



[61] JONATHAN RODRIGUEZ-SANTOS, a.k.a.
"Bizcocho",
(Counts ONE through SIX)

[62] JOHN DOE #8, a.k.a. "Presis's Brother",
(Counts ONE through SIX)



[63] FREDDIE VILLEGAS-CIRINO, a.k.a. "Bebe
Flow", "El Flow",
(Counts ONE through SIX)

[64] DENNYS NAVARRO-MORALES, a.k.a.
"Gemelo",
(Counts ONE through SIX)

[65] JOHN DOE #9, a.k.a. "Changuito",
(Counts ONE through SIX)



[66] VICTOR LOPEZ-ORTIZ, a.k.a. "Luz
Clarita", "Gandul",
(Counts ONE through SIX)

[67] RAMON SOTO-ALAMO, a.k.a. "Justi",
(Counts ONE through SIX)

[68] MARIANO BERMUDEZ-MAYSONET,
a.k.a. "Ralph",
(Counts ONE through SIX)

[69] HOMMY PEREZ-CIRINO, a.k.a. "Homito",
(Counts ONE through SIX)

[70] ANGEL HUERTAS-TORRES, a.k.a. "Tego",
(Counts ONE through SIX)

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

Beginning on a date unknown, but no later than in or about the year 2002, and continuing up to and until the return of the instant Indictment, in the Municipality of Carolina, District of Puerto Rico and within the jurisdiction of this Court,

- [1] HAROLD FIGUEROA-SANCHEZ, a.k.a. "Casco", "Gordo", "Cabeza",
- [2] ANIBAL ESCOBAR-SANCHEZ, a.k.a. "NBA", "Siete Pisos",
- [3] JOSE GONZALEZ-GARCIA a.k.a "Fafi",
- [4] JOSUE AVILES-PEREZ, a.k.a. "El Gordo",
- [5] JOSE G. MORENO-JIMENEZ, a.k.a. "Willy Moreno",
- [6] JEAN C. PIZARRO-MORALES, a.k.a. "Jean Ca", "Puffy",
- [7] JOHN DOE #1, a.k.a. "Jason", "Arrabal",
- [8] JIMMY ORTIZ-ORTIZ,
- [9] EUGENIO GARCIA-PELLOT, a.k.a. "Crunchy", "Geño",
- [10] EMANUEL ARCE-GONZALEZ, a.k.a. "Conan",
- [11] CARLOS PIZARRO-MORALES, a.k.a. "Bondy",
- [12] JOHN DOE #2, a.k.a. "Chango",
- [13] VICTOR ROMAN-RIVERA, a.k.a. "Tito G",
- [14] WILFREDO DIAZ-DE JESUS, a.k.a. "Wika", "Yankee",
- [15] DIEGO SILVA-SANTOS, a.k.a. "Dieguito", "Diamond",
- [16] ANGEL "LNU", a.k.a. "El Flaco"
- [17] MIGUEL SERRANO-MATTA, a.k.a. "Tori", "Estropiao",
- [18] RICHARD MORALES-CRUZ, a.k.a. "Muni",
- [19] RAUL OLIVERA-LANDRAU, a.k.a. "Pupe",
- [20] PABLO BELTRAN-RODRIGUEZ, a.k.a. "Mejicano",
- [21] ELIEZER FIGUEROA-FARGAS, a.k.a. "Eli", "Fifty Cent", "Pepa", "Negrura",
- [22] SAUL HERNANDEZ-COSS, a.k.a. "Tachu", "Tachuela", "Huesos",
- [23] JUAN SERRANO-CHAPMAN, a.k.a. "Tony Presidio", "Presi",
- [24] CARLOS PEREZ-CIRINO, a.k.a. "Charlie Drex"
- [25] JULIO CRUZ-GARCIA, a.k.a. "Julito", "Casper",
- [26] LUIS D. MUÑOZ-FLORES, a.k.a. "Jadiel", "Tio",
- [27] OMAR D. NAVARRO-HERNANDEZ, a.k.a. "El Flow", "Boqui",
- [28] RAFAEL PIZARRO-GARCIA, a.k.a. "Rafi", "Rafi Bear",
- [29] CARLOS FIGUEROA-PIZARRO, a.k.a. "Carlitos", "Papu",
- [30] ANTHONY MUÑOZ-FLORES, a.k.a. "Paparazzi",
- [31] ROBERTO SANTANA-RIVERA, a.k.a. "Impostor",
- [32] JESUS F. DE JESUS RIVERA, a.k.a. "Chino",
- [33] LUIS D. SANTIAGO-PIZARRO, a.k.a. "Cherrybum", "Cherry Bomb",
- [34] RAFAEL J. FLORES QUIÑONES, a.k.a. "Popeye",

- [35] MIGUEL HERNANDEZ-MERCEDES, a.k.a. "Guelo", "Oscar",
- [36] RUBEN RODRIGUEZ-ADORNO, a.k.a. "Eja", "Nene", ".38", "Full",
- [37] EDGARDO VEGA CANALES, a.k.a. "Blim Blim",
- [38] MIGUEL CASTRO-MURIEL, a.k.a. "Pancho",
- [39] JOHN DOE#3, a.k.a. "Pichie",
- [40] JANNY LOPEZ-CALO, a.k.a. "Pelucho",
- [41] VINCE MELENDEZ-"LNU", a.k.a. "Mingo",
- [42] VICTOR CABRERA-PASTRANA, a.k.a. "Vitin Trampa",
- [43] WILFRED ORTIZ-MELECIO, a.k.a. "Falla Guira",
- [44] EMILIO CORRETTJER-RODRIGUEZ, a.k.a. "Millo",
- [45] JOHN DOE#4, a.k.a. "Chupi",
- [46] ERICK LOPEZ-CALO, a.k.a. "Capacete",
- [47] JONATHAN BUSTER-TORRES,
- [48] LUIS DIAZ-CRUZ, a.k.a. "Almeja",
- [49] EMANUEL FORTI-LOPEZ, a.k.a. "Manuel",
- [50] XAVIER "LNU", a.k.a. "Barbie",
- [51] FRANCISCO "LNU", a.k.a. "Bejuco",
- [52] RICHARD CESAREO-GONZALEZ, a.k.a. "Bubu",
- [53] JONATHAN SANTIAGO, a.k.a. "Titi West",
- [54] JOHN DOE #5, a.k.a. "Saca Crippy",
- [55] CISKOULA GARCIA, a.k.a. "Zorillo", "Zorri",
- [56] JESUS M.TORRES-COSS, a.k.a. "Popo",
- [57] JOHN DOE #6, a.k.a. "Murmu",
- [58] FRANCIS GARCIA "LNU",
- [59] RAUL HERNANDEZ-COSS, a.k.a. "Baby",
- [60] JOHN DOE #7, a.k.a. "Antiguo",
- [61] JONATHAN RODRIGUEZ-SANTOS, a.k.a. "Bizcocho",
- [62] JOHN DOE #8, a.k.a. "Presis's Brother",
- [63] FREDDIE VILLEGAS-CIRINO, a.k.a. "Bebe Flow", "El Flow",
- [64] DENNYS NAVARRO-MORALES, a.k.a. "Gemelo",
- [65] JOHN DOE #9, a.k.a. "Changuito",
- [66] VICTOR LOPEZ-ORTIZ, a.k.a. "Luz Clarita", "Gandul",
- [67] RAMON SOTO-ALAMO, a.k.a. "Justi",
- [68] MARIANO BERMUDEZ-MAYSONET, a.k.a. "Ralph",
- [69] HOMMY PEREZ-CIRINO, a.k.a. "Homito",
- [70] ANGEL HUERTAS-FORRES, a.k.a. "Tego",

the defendants herein, did knowingly and intentionally, combine, conspire, and agree with each other and with diverse other 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: in excess of fifty (50) grams of cocaine base (crack), a Schedule II Narcotic Drug Controlled Substance; in excess of one (1) kilogram of heroin, a Schedule I, Narcotic Drug Controlled Substance; in excess of five (5) kilograms of cocaine, a Schedule II,

Narcotic Drug Controlled Substance; in excess of one thousand (1000) kilograms 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; 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 Torres de Sabana Public Housing Project, commonly known as "El Castillo", and other areas within the Municipalities of Carolina and Loiza, 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 points located in Torres de Sabana Public Housing Project and other areas of the Municipalities of Carolina and Loiza, Puerto Rico.
2. It was further part of the manner and means of the conspiracy that the defendants and their co-conspirators would often use the main lobby area of Building A at the Torres the Sabana Public Housing Project as their drug distribution point.
3. 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 points. The defendants and their co-conspirators would act in different roles in order to further the goals of the

conspiracy, to wit: leaders, who directed and supervised runners, enforcers, sellers, drug processors, look-outs, and "emisarios".

4. 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 heroin, cocaine, crack and marijuana in distinctive "baggies" and/or "vials" in order to keep track of their narcotics.

5. 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.

6. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would use apartments located within the Torres de Sabana Public Housing Project in order to store and conceal heroin, cocaine base ("crack"), cocaine, marijuana, Alprazolam ("Xanax"), Oxycodone ("Percocet"), drug paraphernalia, firearms and ammunition.

7. 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 at an apartment located within the Torres de Sabana Public Housing Project, known as the "freezer" (after being equipped with a high capacity air conditioning unit), and/or the "drug laboratory".

8. It was further part of the manner and means of the conspiracy that members of the drug trafficking organization would gather at an apartment, also located within the Torres de Sabana Public Housing Project, known as "the other freezer", to discuss the drug trafficking activities and would further use the same as their leisure and entertainment center. This apartment was equipped with air conditioning, large flat screen television system, electronic game consoles, sofa, lounge chairs, among other amenities.

9. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would use two-way radios ("walkie-talkies" referred to as scanners) in order to communicate and alert the presence of law enforcement agents or members of rival gangs.

10. 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 one of the four (4) strategically located "observation points" within the Torres de Sabana Public Housing Project, in order to alert other co-conspirators of the presence of law enforcement agents and/or rival drug traffickers.

11. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would possess, carry and brandish "high power" rifles while atop the Torres de Sabana Public Housing Project's rooftop. The rooftops were used as they provided an advantage point to observe and protect their drug distribution point.

12. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would provide payments to an individual in exchange for sensitive law enforcement information, regarding the dates and times of prospective interventions by the Police of Puerto Rico at the Torres de Sabana Public Housing Project and/or law enforcement initiatives aimed at disrupting their drug trafficking activities.

13. 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.

14. 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.

15. It was further part of the manner and means of the conspiracy that members of the drug trafficking organization would often "abduct" and assault rival drug traffickers as well as members of their own drug trafficking organization, in order to intimidate and maintain control of the drug trafficking activities. They would often use a white van in order to "transport" the abductees out of the Torres de Sabana Public Housing Project.

16. 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 Torres de Sabana Public Housing Project and/or members of the conspiracy, as well as enemies of the drug trafficking organization.

III. ROLES OF THE MEMBERS OF THE CONSPIRACY

A. Leaders

Leaders directly controlled and supervised the drug trafficking activities at the drug distribution points located at the Torres de Sabana Public Housing Project, and the Municipalities of Carolina and Loiza, 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 Torres de Sabana Public Housing Project drug distribution point and other areas within the Municipalities of Carolina and Loiza. At various times during the course of the conspiracy, leaders purchased firearms and allowed members of the conspiracy to carry such firearms and ammunition in order to protect the drug distribution activities.

The following co-conspirators acted as leaders:

[1] **HAROLD FIGUEROA-SANCHEZ**, a.k.a. "Casco", "Gordo", "Cabeza" is the main leader of the drug trafficking organization.

In the year 2002, **JOSE LOPEZ ROSARIO**, a.k.a. "Coquito" had control of a drug distribution point located at the Torres de Sabana Public Housing Project. Upon "Coquito's" death, on July 28, 2006, [1] **HAROLD FIGUEROA-SANCHEZ**, a.k.a. "Casco", "Gordo", "Cabeza" became the main leader of the drug trafficking organization, wherefore he controlled, through co-defendants also acting as leaders, the drug distribution points located at Torres de Sabana Public Housing Project as well as other areas in the Municipalities of Carolina and Loiza, Puerto Rico. As the main leader, he directly supervised the operations at Torres de Sabana Public Housing Project, 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 had the final approving authority as to the discipline to be imposed upon residents of the Public Housing Project, members of the conspiracy, as well as its enemies and rivals. [1] **HAROLD FIGUEROA-SANCHEZ**, a.k.a. "Casco", "Gordo", "Cabeza" was also known as the "owner" of the ten dollar (\$10.00) cocaine.

[2] **ANIBAL ESCOBAR-SANCHEZ** a.k.a. "NBA", "Siete Pisos" was also a leader in the drug trafficking organization. He was also known as the "owner" of the six dollar (\$6.00) cocaine.

[3] **JOSE GONZALEZ-GARCIA** a.k.a. "Fafi", was also a leader in the drug trafficking organization. He was also known as the "owner" of the marijuana.

[4] **JOSUE AVILES-PEREZ**, a.k.a. "Gordo", was also a leader in the drug trafficking organization. He was also known as the owner of the crack cocaine.

[5] **JOSE G. MORENO-JIMENEZ** a.k.a. "Willy Moreno", was also a leader in the drug trafficking organization. He was also known as the owner of the heroin.

[6] **JEAN C. PIZARRO-MORALES**, a.k.a. "Jean Ca", "Puffy", was also a leader in the drug trafficking organization. He was also known as the owner of the "Xanax" and "Percocet".

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 to the drug distribution organization and/or drug distribution points located in the Municipalities of Carolina and Loiza, Puerto Rico.

The following defendants and their co-conspirators acted as suppliers for the drug trafficking organization:

[7] **JOHN DOE #1**, a.k.a. "Jason" "Arrabal" was a supplier for the drug trafficking organization. He was also known as the supplier of the narcotics to be distributed at the drug trafficking organization's drug distribution points located outside the Torres de Sabana Public Housing Project.

[8] **JIMMY ORTIZ-ORTIZ**, was a supplier for the drug trafficking organization. He was also known as the supplier of the narcotics to be distributed at the drug trafficking organization's drug

distribution points located outside the Torres de Sabana Public Housing Project.

C. Enforcers

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 points. The following individuals and others known and unknown to the Grand Jury, acted as enforcers for the drug trafficking organization:

[9] **EUGENIO GARCIA-PELLOT, a.k.a. "Crunchy", "Geño",** acted as an enforcer for the drug trafficking organization. Additionally, he would often act as a runner within the conspiracy;

[10] **EMANUEL ARCE-GONZALEZ, a.k.a. "Conan",** acted as an enforcer for the drug trafficking organization. Additionally, he would often act as a seller within the conspiracy;

[11] **CARLOS PIZARRO-MORALES, a.k.a. "Bondy",** acted as an enforcer for the drug trafficking organization. Additionally, he would often act as a seller within the conspiracy;

[12] **JOHN DOE #2, a.k.a. "Chango"** had multiple roles within the drug trafficking organization. He would often act as an enforcer, as a seller and as a look out for the drug trafficking organization.

D. 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 daily activities of the drug point.

In addition to the enforcers who also acted as runners, the following individuals and others known and unknown to this Grand Jury, acted as runners for the drug trafficking organization:

[13] VICTOR ROMAN-RIVERA, a.k.a. "Tito G", acted as a runner for the drug trafficking organization. Additionally, he would often act as drug processor within the conspiracy.

[14] WILFREDO DIAZ-DE JESUS, a.k.a. "Wika", "Yankee",

[15] DIEGO SILVA-SANTOS, a.k.a. "Dieguito", "Diamond", acted as a runner for the drug trafficking organization. Additionally, he would often act as a seller within the conspiracy;

[16] ANGEL "LNU", a.k.a. "El Flaco".

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. At times, sellers would use two-way radios ("walkie-talkies", "scanners") in order to communicate with other members of the conspiracy.

In addition to the above-mentioned 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:

[17] MIGUEL SERRANO-MATTA, a.k.a. "Tori", "Estropiao",

[18] RICHARD MORALES-CRUZ, a.k.a. "Muni",

[19] RAUL OLIVERA-LANDRAU, a.k.a. "Pupe",

[20] PABLO BELTRAN-RODRIGUEZ, a.k.a. "Mejicano",

[21] ELIEZER FIGUEROA-FARGAS, a.k.a. "Eli", "Fifty Cent", "Pepa", "Negrura",

[22] SAUL HERNANDEZ-COSS, a.k.a. "Tachu", "Tachuela", "Huesos", who also acted as a look-out within the conspiracy;

[23] JUAN SERRANO-CHAPMAN, a.k.a. "Tony Presidio", "Presi", who also acted as a look-out within the conspiracy;

[24] CARLOS PEREZ-CIRINO, a.k.a. "Charlie Drex",

[25] JULIO CRUZ-GARCIA, a.k.a. "Julito", "Casper",

[26] LUIS D. MUÑOZ-FLORES, a.k.a. "Jadiel", "Tio", who also acted as a look-out within the conspiracy,

[27] OMAR D. NAVARRO-HERNANDEZ, a.k.a. "El Flow", "Boqui", who also acted as a look-out within the conspiracy,

[28] RAFAEL PIZARRO-GARCIA, a.k.a. "Rafi", "Rafi Bear",

[29] CARLOS FIGUEROA-PIZARRO, a.k.a. "Carlitos", "Papu", who also acted as a look-out within the conspiracy;

[30] ANTHONY MUÑOZ-FLORES, a.k.a. "Paparazzi", who also acted as a look-out within the conspiracy,

[31] ROBERTO SANTANA-RIVERA, a.k.a. "Impostor", who also acted as a look-out within the conspiracy,

[32] JESUS F. DE JESUS RIVERA, a.k.a. "Chino", who also acted as a look-out and a facilitator within the conspiracy,

[33] LUIS D. SANTIAGO-PIZARRO, a.k.a. "Cherrybum", "Cherry Bomb", who also acted as a look-out within the conspiracy;

[34] RAFAEL J. FLORES QUIÑONES, a.k.a. "Popeye", who also acted as a look-out within the conspiracy;

[35] MIGUEL HERNANDEZ-MERCEDES, a.k.a. "Guelo", "Oscar",

[36] RUBEN RODRIGUEZ-ADORNO, a.k.a. "Eja", "Nene", ".38" who also acted as a look-out within the conspiracy,

[37] EDGARDO VEGA-CANALES, a.k.a. "Blim Blim",

[38] MIGUEL CASTRO-MURIEL, a.k.a. "Pancho",

[39] JOHN DOE #3, a.k.a. "Pichie",

[40] JANNY LOPEZ-CALO, a.k.a. "Pelucho", who also acted as a look-out within the conspiracy,

[41] VINCE MELENDEZ-"LNU", a.k.a. "Mingo",

[42] VICTOR CABRERA-PASTRANA, a.k.a. "Vitin Trampa", who also acted as a look-out within the conspiracy,

[43] WILFRED ORTIZ-MELECIO, a.k.a. "Falla Guira", who also acted as a look-out within the conspiracy,

[44] EMILIO CORRETJER-RODRIGUEZ, a.k.a. "Millo",

[45] JOHN DOE # 4, a.k.a. "Chupi", who also acted as a look-out within the conspiracy,

[46] ERICK LOPEZ-CALO, a.k.a. "Capacete", who also acted as a look-out within the conspiracy,

[47] JONATHAN BUSTER-TORRES, who also acted as a look-out within the conspiracy;

[48] LUIS DIAZ-CRUZ, a.k.a. "Almeja",

[49] EMANUEL FORTI-LOPEZ, a.k.a. "Manuel", who also acted as a look-out within the conspiracy,

[50] XAVIER "LNU", a.k.a. "Barbie", who also acted as a look-out within the conspiracy,

[51] FRANCISCO "LNU", a.k.a. "Bejuco",

[52] RICHARD CESAREO-GONZALEZ, a.k.a. "Bubu", who also acted as a look-out within the conspiracy,

[53] JONATHAN X. SANTIAGO, a.k.a. "Titi West", who also acted as a look-out within the conspiracy,

[54] JOHN DOE #5 a.k.a. "Saca Crippy", who also acted as a look-out within the conspiracy,

[55] CISKOULA GARCIA-"LNU", a.k.a. "Zorillo", "Zorri", who also acted as a look-out within the conspiracy,

[56] JESUS M. TORRES-COSS, a.k.a. "Popo", who also acted as a look-out within the conspiracy,

[57] JOHN DOE #6, a.k.a. "Murmu", who also acted as a look-out within the conspiracy,

[58] FRANCIS GARCIA "LNU", who also acted as a look-out within the conspiracy;

[59] RAUL HERNANDEZ-COSS, a.k.a. "Baby", who also acted as a look-out within the

conspiracy,

[60] JOHN DOE #7, a.k.a. "Antiguo", who also acted as a look-out within the conspiracy,

[61] JONATHAN RODRIGUEZ-SANTOS, a.k.a. "Bizcocho", who also acted as a look-out within the conspiracy,

[62] JOHN DOE # 8, a.k.a. "Presis's Brother", who also acted as a look-out within the conspiracy,

[63] FREDDIE VILLEGAS-CIRINO, a.k.a. "Bebe Flow", "El Flow",

[64] DENNYS NAVARRO MORALES, a.k.a. "Gemelo",

[65] JOHN DOE # 9, a.k.a. "Changuito",

[66] VICTOR LOPEZ-ORTIZ, a.k.a. "Luz Clarita", "Gandul", who also acted as a look-out within the conspiracy,

F. Drug Processors

Drug processors would meet under the direction of the leaders of the drug trafficking organization at the "freezer" and other apartments within the Torres de Sabana Public Housing Project in order to weigh, cut, mix, and prepare the controlled substances for street distribution. They would also package the heroin, crack, cocaine and marihuana in single dosage amounts and in distinctive "baggies", "decks" and/or "vials".

G. Look-Outs

"Look-outs" would conduct surveillance at strategic locations within the Torres de Sabana Public Housing Project in order to detect the presence of law enforcement personnel and members of rival gangs; they would communicate their observations to members and other look-outs and/or sellers with two-way radios ("walkie-talkies", scanners) and would receive payment from the sellers for their services as look-outs.

H. Facilitators

Some facilitators allowed the use of their apartments in the public housing project in order to process, store and package narcotics for distribution. Facilitators would additionally deliver monies, to and from, the

runners; they often served as messengers for members of the conspiracy; and would often serve as intermediaries during drug transactions.

The following co-defendants at some point during their participation in the conspiracy did act as facilitators for the above-described drug trafficking organization:

- [67] RAMON SOTO-ALAMO, a.k.a. "Justi",
- [68] MARIANO BERMUDEZ-MAYSONET, a.k.a. "Ralph",
- [69] HOMMY PEREZ-CIRINO, a.k.a. "Homito",
- [70] ANGEL HUERTAS-TORRES, a.k.a. "Tego",

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 2002, and continuing up to and until the return of the instant Indictment, in the Municipality of Carolina, District of Puerto Rico and within the jurisdiction of this Court,

- [1] HAROLD FIGUEROA-SANCHEZ, a.k.a. "Casco", "Gordo", "Cabeza",
- [2] ANIBAL ESCOBAR-SANCHEZ, a.k.a. "NBA", "Siete Pisos",
- [3] JOSE GONZALEZ-GARCIA a.k.a "Fafi",
- [4] JOSUE AVILES-PEREZ, a.k.a. "El Gordo",
- [5] JOSE G. MORENO-JIMENEZ, a.k.a. "Willy Moreno",
- [6] JEAN C. PIZARRO-MORALES, a.k.a. "Jean Ca", "Puffy",
- [7] JOHN DOE #1, a.k.a. "Jason", "Arrabal",
- [8] JIMMY ORTIZ-ORTIZ,
- [9] EUGENIO GARCIA-PELLOT, a.k.a. "Crunchy", "Geño",
- [10] EMANUEL ARCE-GONZALEZ, a.k.a. "Conan",
- [11] CARLOS PIZARRO-MORALES, a.k.a. "Bondy",
- [12] JOHN DOE #2, a.k.a. "Chango",
- [13] VICTOR ROMAN-RIVERA, a.k.a. "Tito G",
- [14] WILFREDO DIAZ-DE JESUS, a.k.a. "Wika", "Yankee",
- [15] DIEGO SILVA-SANTOS, a.k.a. "Dieguito", "Diamond",
- [16] ANGEL "LNU", a.k.a. "El Flaco"
- [17] MIGUEL SERRANO-MATTA, a.k.a. "Tori", "Estropiao",
- [18] RICHARD MORALES-CRUZ, a.k.a. "Muni",
- [19] RAUL OLIVERA-LANDRAU, a.k.a. "Pupe",
- [20] PABLO BELTRAN-RODRIGUEZ, a.k.a. "Mejicano",
- [21] ELIEZER FIGUEROA-FARGAS, a.k.a. "Eli", "Fifty Cent", "Pepa", "Negrura",
- [22] SAUL HERNANDEZ-COSS, a.k.a. "Tachu", "Tachuela", "Huesos",
- [23] JUAN SERRANO-CHAPMAN, a.k.a. "Tony Presidio", "Presi",

- [24] CARLOS PEREZ-CIRINO, a.k.a. "Charlie Drex"
- [25] JULIO CRUZ-GARCIA, a.k.a. "Julito", "Casper",
- [26] LUIS D. MUÑOZ-FLORES, a.k.a. "Jadiel", "Tio",
- [27] OMAR D. NAVARRO-HERNANDEZ, a.k.a. "El Flow", "Boqui",
- [28] RAFAEL PIZARRO-GARCIA, a.k.a. "Rafi", "Rafi Bear",
- [29] CARLOS FIGUEROA-PIZARRO, a.k.a. "Carlitos", "Papu",
- [30] ANTHONY MUÑOZ-FLORES, a.k.a. "Paparazzi",
- [31] ROBERTO SANTANA-RIVERA, a.k.a. "Impostor",
- [32] JESUS F. DE JESUS RIVERA, a.k.a. "Chino",
- [33] LUIS D. SANTIAGO-PIZARRO, a.k.a. "Cherrybum", "Cherry Bomb",
- [34] RAFAEL J. FLORES QUIÑONES, a.k.a. "Popeye",
- [35] MIGUEL HERNANDEZ-MERCEDES, a.k.a. "Guelo", "Oscar",
- [36] RUBEN RODRIGUEZ-ADORNO, a.k.a. "Eja", "Nene", ".38", "Full",
- [37] EDGARDO VEGA CANALES, a.k.a. "Blim Blim",
- [38] MIGUEL CASTRO-MURIEL, a.k.a. "Pancho",
- [39] JOHN DOE#3, a.k.a. "Pichie",
- [40] JANNY LOPEZ-CALO, a.k.a. "Pelucho",
- [41] VINCE MELENDEZ-"LNU", a.k.a. "Mingo",
- [42] VICTOR CABRERA-PASTRANA, a.k.a. "Vitin Trampa",
- [43] WILFRED ORTIZ-MELECIO, a.k.a. "Falla Guira",
- [44] EMILIO CORRETJER-RODRIGUEZ, a.k.a. "Millo",
- [45] JOHN DOE#4, a.k.a. "Chupi",
- [46] ERICK LOPEZ-CALO, a.k.a. "Capacete",
- [47] JONATHAN BUSTER-TORRES,
- [48] LUIS DIAZ-CRUZ, a.k.a. "Almeja",
- [49] EMANUEL FORTI-LOPEZ, a.k.a. "Manuel",
- [50] XAVIER "LNU", a.k.a. "Barbie",
- [51] FRANCISCO "LNU", a.k.a. "Bejuco",
- [52] RICHARD CESAREO-GONZALEZ, a.k.a. "Bubu",
- [53] JONATHAN SANTIAGO, a.k.a. "Titi West",
- [54] JOHN DOE #5, a.k.a. "Saca Crippy",
- [55] CISKOUA GARCIA, a.k.a. "Zorillo", "Zorri",
- [56] JESUS M.TORRES-COSS, a.k.a. "Popo",
- [57] JOHN DOE #6, a.k.a. "Murmu",
- [58] FRANCIS GARCIA "LNU",
- [59] RAUL HERNANDEZ-COSS, a.k.a. "Baby",
- [60] JOHN DOE #7, a.k.a. "Antiguo",
- [61] JONATHAN RODRIGUEZ-SANTOS, a.k.a. "Bizcocho",
- [62] JOHN DOE #8, a.k.a. "Presis's Brother",
- [63] FREDDIE VILLEGAS-CIRINO, a.k.a. "Bebe Flow", "El Flow",
- [64] DENNYS NAVARRO-MORALES, a.k.a. "Gemelo",
- [65] JOHN DOE #9, a.k.a. "Changuito",
- [66] VICTOR LOPEZ-ORTIZ, a.k.a. "Luz Clarita", "Gandul",
- [67] RAMON SOTO-ALAMO, a.k.a. "Justi",
- [68] MARIANO BERMUDEZ-MAYSONET, a.k.a. "Ralph",
- [69] HOMMY PEREZ-CIRINO, a.k.a. "Homito",
- [70] ANGEL HUERTAS-TORRES, a.k.a. "Tego",

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 Torres de Sabana 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 2002, and continuing up to and until the return of the instant Indictment, in the Municipality of Carolina, District of Puerto Rico and within the jurisdiction of this Court,

- [1] HAROLD FIGUEROA-SANCHEZ, a.k.a. "Casco", "Gordo", "Cabeza",
- [2] ANIBAL ESCOBAR-SANCHEZ, a.k.a. "NBA", "Siete Pisos",
- [3] JOSE GONZALEZ-GARCIA a.k.a "Fafi",
- [4] JOSUE AVILES-PEREZ, a.k.a. "El Gordo",
- [5] JOSE G. MORENO-JIMENEZ, a.k.a. "Willy Moreno",
- [6] JEAN C. PIZARRO-MORALES, a.k.a. "Jean Ca", "Puffy",
- [7] JOHN DOE #1, a.k.a. "Jason", "Arrabal",
- [8] JIMMY ORTIZ-ORTIZ,
- [9] EUGENIO GARCIA-PELLOT, a.k.a. "Crunchy", "Geño",
- [10] EMANUEL ARCE-GONZALEZ, a.k.a. "Conan",
- [11] CARLOS PIZARRO-MORALES, a.k.a. "Bondy",
- [12] JOHN DOE #2, a.k.a. "Chango",
- [13] VICTOR ROMAN-RIVERA, a.k.a. "Tito G",
- [14] WILFREDO DIAZ-DE JESUS, a.k.a. "Wika", "Yankee",
- [15] DIEGO SILVA-SANTOS, a.k.a. "Dieguito", "Diamond",
- [16] ANGEL "LNU", a.k.a. "El Flaco"
- [17] MIGUEL SERRANO-MATTA, a.k.a. "Tori", "Estropiao",
- [18] RICHARD MORALES-CRUZ, a.k.a. "Muni",
- [19] RAUL OLIVERA-LANDRAU, a.k.a. "Pupe",
- [20] PABLO BELTRAN-RODRIGUEZ, a.k.a. "Mejicano",
- [21] ELIEZER FIGUEROA-FARGAS, a.k.a. "Eli", "Fifty Cent", "Pepa", "Negrura",
- [22] SAUL HERNANDEZ-COSS, a.k.a. "Tachu", "Tachuela", "Huesos",
- [23] JUAN SERRANO-CHAPMAN, a.k.a. "Tony Presidio", "Presi",
- [24] CARLOS PEREZ-CIRINO, a.k.a. "Charlie Drex"

- [25] JULIO CRUZ-GARCIA, a.k.a. "Julito", "Casper",
- [26] LUIS D. MUÑOZ-FLORES, a.k.a. "Jadiel", "Tio",
- [27] OMAR D. NAVARRO-HERNANDEZ, a.k.a. "El Flow", "Boqui",
- [28] RAFAEL PIZARRO-GARCIA, a.k.a. "Rafi", "Rafi Bear",
- [29] CARLOS FIGUEROA-PIZARRO, a.k.a. "Carlitos", "Papu",
- [30] ANTHONY MUÑOZ-FLORES, a.k.a. "Paparazzi",
- [31] ROBERTO SANTANA-RIVERA, a.k.a. "Impostor",
- [32] JESUS F. DE JESUS RIVERA, a.k.a. "Chino",
- [33] LUIS D. SANTIAGO-PIZARRO, a.k.a. "Cherrybum", "Cherry Bomb",
- [34] RAFAEL J. FLORES QUIÑONES, a.k.a. "Popeye",
- [35] MIGUEL HERNANDEZ-MERCEDES, a.k.a. "Guelo", "Oscar",
- [36] RUBEN RODRIGUEZ-ADORNO, a.k.a. "Eja", "Nene", ".38", "Full",
- [37] EDGARDO VEGA CANALES, a.k.a. "Blim Blim",
- [38] MIGUEL CASTRO-MURIEL, a.k.a. "Pancho",
- [39] JOHN DOE#3, a.k.a. "Pichie",
- [40] JANNY LOPEZ-CALO, a.k.a. "Pelucho",
- [41] VINCE MELENDEZ-"LNU", a.k.a. "Mingo",
- [42] VICTOR CABRERA-PASTRANA, a.k.a. "Vitin Trampa",
- [43] WILFRED ORTIZ-MELECIO, a.k.a. "Falla Guira",
- [44] EMILIO CORRETJER-RODRIGUEZ, a.k.a. "Millo",
- [45] JOHN DOE#4, a.k.a. "Chupi",
- [46] ERICK LOPEZ-CALO, a.k.a. "Capacete",
- [47] JONATHAN BUSTER-TORRES,
- [48] LUIS DIAZ-CRUZ, a.k.a. "Almeja",
- [49] EMANUEL FORTI-LOPEZ, a.k.a. "Manuel",
- [50] XAVIER "LNU", a.k.a. "Barbie",
- [51] FRANCISCO "LNU", a.k.a. "Bejuco",
- [52] RICHARD CESAREO-GONZALEZ, a.k.a. "Bubu",
- [53] JONATHAN SANTIAGO, a.k.a. "Titi West",
- [54] JOHN DOE #5, a.k.a. "Saca Crippy",
- [55] CISKOULA GARCIA, a.k.a. "Zorillo", "Zorri",
- [56] JESUS M.TORRES-COSS, a.k.a. "Popo",
- [57] JOHN DOE #6, a.k.a. "Murmu",
- [58] FRANCIS GARCIA "LNU",
- [59] RAUL HERNANDEZ-COSS, a.k.a. "Baby",
- [60] JOHN DOE #7, a.k.a. "Antiguo",
- [61] JONATHAN RODRIGUEZ-SANTOS, a.k.a. "Bizcocho",
- [62] JOHN DOE #8, a.k.a. "Presis's Brother",
- [63] FREDDIE VILLEGAS-CIRINO, a.k.a. "Bebe Flow", "El Flow",
- [64] DENNYS NAVARRO-MORALES, a.k.a. "Gemelo",
- [65] JOHN DOE #9, a.k.a. "Changuito",
- [66] VICTOR LOPEZ-ORTIZ, a.k.a. "Luz Clarita", "Gandul",
- [67] RAMON SOTO-ALAMO, a.k.a. "Justi",
- [68] MARIANO BERMUDEZ-MAYSONET, a.k.a. "Ralph",
- [69] HOMMY PEREZ-CIRINO, a.k.a. "Homito",
- [70] ANGEL HUERTAS-TORRES, a.k.a. "Tego",

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute fifty (50) 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 Torres de Sabana 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 2002, and continuing up to and until the return of the instant Indictment, in the Municipality of Carolina, District of Puerto Rico and within the jurisdiction of this Court,

- [1] HAROLD FIGUEROA-SANCHEZ, a.k.a. "Casco", "Gordo", "Cabeza",
- [2] ANIBAL ESCOBAR-SANCHEZ, a.k.a. "NBA", "Siete Pisos",
- [3] JOSE GONZALEZ-GARCIA a.k.a "Fafi",
- [4] JOSUE AVILES-PEREZ, a.k.a. "El Gordo",
- [5] JOSE G. MORENO-JIMENEZ, a.k.a. "Willy Moreno",
- [6] JEAN C. PIZARRO-MORALES, a.k.a. "Jean Ca", "Puffy",
- [7] JOHN DOE #1, a.k.a. "Jason", "Arrabal",
- [8] JIMMY ORTIZ-ORTIZ,
- [9] EUGENIO GARCIA-PELLOT, a.k.a. "Crunchy", "Geño",
- [10] EMANUEL ARCE-GONZALEZ, a.k.a. "Conan",
- [11] CARLOS PIZARRO-MORALES, a.k.a. "Bondy",
- [12] JOHN DOE #2, a.k.a. "Chango",
- [13] VICTOR ROMAN-RIVERA, a.k.a. "Tito G",
- [14] WILFREDO DIAZ-DE JESUS, a.k.a. "Wika", "Yankee",
- [15] DIEGO SILVA-SANTOS, a.k.a. "Dieguito", "Diamond",
- [16] ANGEL "LNU", a.k.a. "El Flaco"
- [17] MIGUEL SERRANO-MATTA, a.k.a. "Tori", "Estropiao",
- [18] RICHARD MORALES-CRUZ, a.k.a. "Muni",
- [19] RAUL OLIVERA-LANDRAU, a.k.a. "Pupe",
- [20] PABLO BELTRAN-RODRIGUEZ, a.k.a. "Mejicano",
- [21] ELIEZER FIGUEROA-FARGAS, a.k.a. "Eli", "Fifty Cent", "Pepa", "Negrura",
- [22] SAUL HERNANDEZ-COSS, a.k.a. "Tachu", "Tachuela", "Huesos",
- [23] JUAN SERRANO-CHAPMAN, a.k.a. "Tony Presidio", "Presi",
- [24] CARLOS PEREZ-CIRINO, a.k.a. "Charlie Drex"
- [25] JULIO CRUZ-GARCIA, a.k.a. "Julito", "Casper",
- [26] LUIS D. MUÑOZ-FLORES, a.k.a. "Jadial", "Tio",
- [27] OMAR D. NAVARRO-HERNANDEZ, a.k.a. "El Flow", "Boqui",

- [28] RAFAEL PIZARRO-GARCIA, a.k.a. "Rafi", "Rafi Bear",
- [29] CARLOS FIGUEROA-PIZARRO, a.k.a. "Carlitos", "Papu",
- [30] ANTHONY MUÑOZ-FLORES, a.k.a. "Paparazzi",
- [31] ROBERTO SANTANA-RIVERA, a.k.a. "Impostor",
- [32] JESUS F. DE JESUS RIVERA, a.k.a. "Chino",
- [33] LUIS D. SANTIAGO-PIZARRO, a.k.a. "Cherrybum", "Cherry Bomb",
- [34] RAFAEL J. FLORES QUIÑONES, a.k.a. "Popeye",
- [35] MIGUEL HERNANDEZ-MERCEDES, a.k.a. "Guelo", "Oscar",
- [36] RUBEN RODRIGUEZ-ADORNO, a.k.a. "Eja", "Nene", ".38", "Full",
- [37] EDGARDO VEGA CANALES, a.k.a. "Blim Blim",
- [38] MIGUEL CASTRO-MURIEL, a.k.a. "Pancho",
- [39] JOHN DOE#3, a.k.a. "Pichie",
- [40] JANNY LOPEZ-CALO, a.k.a. "Pelucho",
- [41] VINCE MELENDEZ-"LNU", a.k.a. "Mingo",
- [42] VICTOR CABRERA-PASTRANA, a.k.a. "Vitin Trampa",
- [43] WILFRED ORTIZ-MELECIO, a.k.a. "Falla Guira",
- [44] EMILIO CORRETJER-RODRIGUEZ, a.k.a. "Millo",
- [45] JOHN DOE#4, a.k.a. "Chupi",
- [46] ERICK LOPEZ-CALO, a.k.a. "Capacete",
- [47] JONATHAN BUSTER-TORRES,
- [48] LUIS DIAZ-CRUZ, a.k.a. "Almeja",
- [49] EMANUEL FORTI-LOPEZ, a.k.a. "Manuel",
- [50] XAVIER "LNU", a.k.a. "Barbie",
- [51] FRANCISCO "LNU", a.k.a. "Bejuco",
- [52] RICHARD CESAREO-GONZALEZ, a.k.a. "Bubu",
- [53] JONATHAN SANTIAGO, a.k.a. "Titi West",
- [54] JOHN DOE #5, a.k.a. "Saca Crippy",
- [55] CISKOULA GARCIA, a.k.a. "Zorillo", "Zorri",
- [56] JESUS M.TORRES-COSS, a.k.a. "Popo",
- [57] JOHN DOE #6, a.k.a. "Murmu",
- [58] FRANCIS GARCIA "LNU",
- [59] RAUL HERNANDEZ-COSS, a.k.a. "Baby",
- [60] JOHN DOE #7, a.k.a. "Antiguo",
- [61] JONATHAN RODRIGUEZ-SANTOS, a.k.a. "Biscocho",
- [62] JOHN DOE #8, a.k.a. "Presis's Brother",
- [63] FREDDIE VILLEGAS-CIRINO, a.k.a. "Bebe Flow", "El Flow",
- [64] DENNYS NAVARRO-MORALES, a.k.a. "Gemelo",
- [65] JOHN DOE #9, a.k.a. "Changuito",
- [66] VICTOR LOPEZ-ORTIZ, a.k.a. "Luz Clarita", "Gandul",
- [67] RAMON SOTO-ALAMO, a.k.a. "Justi",
- [68] MARIANO BERMUDEZ-MAYSONET, a.k.a. "Ralph",
- [69] HOMMY PEREZ-CIRINO, a.k.a. "Homito",
- [70] ANGEL HUERTAS-TORRES, a.k.a. "Tego",

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 Torres de Sabana 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 2002, and continuing up to and until the return of the instant Indictment, in the Municipality of Carolina, District of Puerto Rico and within the jurisdiction of this Court,

- [1] HAROLD FIGUEROA-SANCHEZ, a.k.a. "Casco", "Gordo", "Cabeza",
- [2] ANIBAL ESCOBAR-SANCHEZ, a.k.a. "NBA", "Siete Pisos",
- [3] JOSE GONZALEZ-GARCIA a.k.a "Fafi",
- [4] JOSUE AVILES-PEREZ, a.k.a. "El Gordo",
- [5] JOSE G. MORENO-JIMENEZ, a.k.a. "Willy Moreno",
- [6] JEAN C. PIZARRO-MORALES, a.k.a. "Jean Ca", "Puffy",
- [7] JOHN DOE #1, a.k.a. "Jason", "Arrabal",
- [8] JIMMY ORTIZ-ORTIZ,
- [9] EUGENIO GARCIA-PELLOT, a.k.a. "Crunchy", "Geño",
- [10] EMANUEL ARCE-GONZALEZ, a.k.a. "Conan",
- [11] CARLOS PIZARRO-MORALES, a.k.a. "Bondy",
- [12] JOHN DOE #2, a.k.a. "Chango",
- [13] VICTOR ROMAN-RIVERA, a.k.a. "Tito G",
- [14] WILFREDO DIAZ-DE JESUS, a.k.a. "Wika", "Yankee",
- [15] DIEGO SILVA-SANTOS, a.k.a. "Dieguito", "Diamond",
- [16] ANGEL "LNU", a.k.a. "El Flaco"
- [17] MIGUEL SERRANO-MATTA, a.k.a. "Tori", "Estropiao",
- [18] RICHARD MORALES-CRUZ, a.k.a. "Muni",
- [19] RAUL OLIVERA-LANDRAU, a.k.a. "Pupe",
- [20] PABLO BELTRAN-RODRIGUEZ, a.k.a. "Mejicano",
- [21] ELIEZER FIGUEROA-FARGAS, a.k.a. "Eli", "Fifty Cent", "Pepa", "Negrura",
- [22] SAUL HERNANDEZ-COSS, a.k.a. "Tachu", "Tachuela", "Huesos",
- [23] JUAN SERRANO-CHAPMAN, a.k.a. "Tony Presidio", "Presi",
- [24] CARLOS PEREZ-CIRINO, a.k.a. "Charlie Drex"
- [25] JULIO CRUZ-GARCIA, a.k.a. "Julito", "Casper",
- [26] LUIS D. MUÑOZ-FLORES, a.k.a. "Jadiel", "Tio",
- [27] OMAR D. NAVARRO-HERNANDEZ, a.k.a. "El Flow", "Boqui",
- [28] RAFAEL PIZARRO-GARCIA, a.k.a. "Rafi", "Rafi Bear",
- [29] CARLOS FIGUEROA-PIZARRO, a.k.a. "Carlitos", "Papu",
- [30] ANTHONY MUÑOZ-FLORES, a.k.a. "Paparazzi",
- [31] ROBERTO SANTANA-RIVERA, a.k.a. "Impostor",
- [32] JESUS F. DE JESUS RIVERA, a.k.a. "Chino",
- [33] LUIS D. SANTIAGO-PIZARRO, a.k.a. "Cherrybum", "Cherry Bomb",

- [34] RAFAEL J. FLORES QUIÑONES, a.k.a. "Popeye",
- [35] MIGUEL HERNANDEZ-MERCEDES, a.k.a. "Guelo", "Oscar",
- [36] RUBEN RODRIGUEZ-ADORNO, a.k.a. "Eja", "Nene", ".38", "Full",
- [37] EDGARDO VEGA CANALES, a.k.a. "Blim Blim",
- [38] MIGUEL CASTRO-MURIEL, a.k.a. "Pancho",
- [39] JOHN DOE#3, a.k.a. "Pichie",
- [40] JANNY LOPEZ-CALO, a.k.a. "Pelucho",
- [41] VINCE MELENDEZ-"LNU", a.k.a. "Mingo",
- [42] VICTOR CABRERA-PASTRANA, a.k.a. "Vitin Trampa",
- [43] WILFRED ORTIZ-MELECIO, a.k.a. "Falla Guira",
- [44] EMILIO CORRETTJER-RODRIGUEZ, a.k.a. "Millo",
- [45] JOHN DOE#4, a.k.a. "Chupi",
- [46] ERICK LOPEZ-CALO, a.k.a. "Capacete",
- [47] JONATHAN BUSTER-TORRES,
- [48] LUIS DIAZ-CRUZ, a.k.a. "Almeja",
- [49] EMANUEL FORTI-LOPEZ, a.k.a. "Manuel",
- [50] XAVIER "LNU", a.k.a. "Barbie",
- [51] FRANCISCO "LNU", a.k.a. "Bejuco",
- [52] RICHARD CESAREO-GONZALEZ, a.k.a. "Bubu",
- [53] JONATHAN SANTIAGO, a.k.a. "Titi West",
- [54] JOHN DOE #5, a.k.a. "Saca Crippy",
- [55] CISKOULA GARCIA, a.k.a. "Zorillo", "Zorri",
- [56] JESUS M.TORRES-COSS, a.k.a. "Popo",
- [57] JOHN DOE #6, a.k.a. "Murmu",
- [58] FRANCIS GARCIA "LNU",
- [59] RAUL HERNANDEZ-COSS, a.k.a. "Baby",
- [60] JOHN DOE #7, a.k.a. "Antiguo",
- [61] JONATHAN RODRIGUEZ-SANTOS, a.k.a. "Bizcocho",
- [62] JOHN DOE #8, a.k.a. "Presis's Brother",
- [63] FREDDIE VILLEGAS-CIRINO, a.k.a. "Bebe Flow", "El Flow",
- [64] DENNYS NAVARRO-MORALES, a.k.a. "Gemelo",
- [65] JOHN DOE #9, a.k.a. "Changuito",
- [66] VICTOR LOPEZ-ORTIZ, a.k.a. "Luz Clarita", "Gandul",
- [67] RAMON SOTO-ALAMO, a.k.a. "Justi",
- [68] MARIANO BERMUDEZ-MAYSONET, a.k.a. "Ralph",
- [69] HOMMY PEREZ-CIRINO, a.k.a. "Homito",
- [70] ANGEL HUERTAS-TORRES, a.k.a. "Tego",

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute one thousand (1000) 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 Torres de Sabana 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

Conspiracy to Possess Firearms During and in Relation to Narcotics Trafficking Offenses

Beginning on a date unknown, but no later than in or about the year 2002, and continuing up to and until the return of the instant Indictment, in the Municipality of Carolina, District of Puerto Rico and within the jurisdiction of this Court,

- [1] HAROLD FIGUEROA-SANCHEZ, a.k.a. "Casco", "Gordo", "Cabeza",
- [2] ANIBAL ESCOBAR-SANCHEZ, a.k.a. "NBA", "Siete Pisos",
- [3] JOSE GONZALEZ-GARCIA a.k.a "Fafi",
- [4] JOSUE AVILES-PEREZ, a.k.a. "El Gordo",
- [5] JOSE G. MORENO-JIMENEZ, a.k.a. "Willy Moreno",
- [6] JEAN C. PIZARRO-MORALES, a.k.a. "Jean Ca", "Puffy",
- [7] JOHN DOE #1, a.k.a. "Jason", "Arrabal",
- [8] JIMMY ORTIZ-ORTIZ,
- [9] EUGENIO GARCIA-PELLOT, a.k.a. "Crunchy", "Geño",
- [10] EMANUEL ARCE-GONZALEZ, a.k.a. "Conan",
- [11] CARLOS PIZARRO-MORALES, a.k.a. "Bondy",
- [12] JOHN DOE #2, a.k.a. "Chango",
- [13] VICTOR ROMAN-RIVERA, a.k.a. "Tito G",
- [14] WILFREDO DIAZ-DE JESUS, a.k.a. "Wika", "Yankee",
- [15] DIEGO SILVA-SANTOS, a.k.a. "Dieguito", "Diamond",
- [16] ANGEL "LNU", a.k.a. "El Flaco"
- [17] MIGUEL SERRANO-MATTA, a.k.a. "Tori", "Estropiao",
- [18] RICHARD MORALES-CRUZ, a.k.a. "Muni",
- [19] RAUL OLIVERA-LANDRAU, a.k.a. "Pupe",
- [20] PABLO BELTRAN-RODRIGUEZ, a.k.a. "Mejicano",
- [21] ELIEZER FIGUEROA-FARGAS, a.k.a. "Eli", "Fifty Cent", "Pepa", "Negrura",
- [22] SAUL HERNANDEZ-COSS, a.k.a. "Tachu", "Tachuela", "Huesos",
- [23] JUAN SERRANO-CHAPMAN, a.k.a. "Tony Presidio", "Presi",
- [24] CARLOS PEREZ-CIRINO, a.k.a. "Charlie Drex"
- [25] JULIO CRUZ-GARCIA, a.k.a. "Julito", "Casper",
- [26] LUIS D. MUÑOZ-FLORES, a.k.a. "Jadiel", "Tio",
- [27] OMAR D. NAVARRO-HERNANDEZ, a.k.a. "El Flow", "Boqui",
- [28] RAFAEL PIZARRO-GARCIA, a.k.a. "Rafi", "Rafi Bear",
- [29] CARLOS FIGUEROA-PIZARRO, a.k.a. "Carlitos", "Papu",
- [30] ANTHONY MUÑOZ-FLORES, a.k.a. "Paparazzi",
- [31] ROBERTO SANTANA-RIVERA, a.k.a. "Impostor",
- [32] JESUS F. DE JESUS RIVERA, a.k.a. "Chino",
- [33] LUIS D. SANTIAGO-PIZARRO, a.k.a. "Cherrybum", "Cherry Bomb",
- [34] RAFAEL J. FLORES QUIÑONES, a.k.a. "Popeye",
- [35] MIGUEL HERNANDEZ-MERCEDES, a.k.a. "Guelo", "Oscar",
- [36] RUBEN RODRIGUEZ-ADORNO, a.k.a. "Eja", "Nene", ".38", "Full",
- [37] EDGARDO VEGA CANALES, a.k.a. "Blim Blim",
- [38] MIGUEL CASTRO-MURIEL, a.k.a. "Pancho",
- [39] JOHN DOE#3, a.k.a. "Pichie",

- [40] JANNY LOPEZ-CALO, a.k.a. "Pelucho",
- [41] VINCE MELENDEZ-"LNU", a.k.a. "Mingo",
- [42] VICTOR CABRERA-PASTRANA, a.k.a. "Vitin Trampa",
- [43] WILFRED ORTIZ-MELECIO, a.k.a. "Falla Guira",
- [44] EMILIO CORRETJER-RODRIGUEZ, a.k.a. "Millo",
- [45] JOHN DOE#4, a.k.a. "Chupi",
- [46] ERICK LOPEZ-CALO, a.k.a. "Capacete",
- [47] JONATHAN BUSTER-TORRES,
- [48] LUIS DIAZ-CRUZ, a.k.a. "Almeja",
- [49] EMANUEL FORTI-LOPEZ, a.k.a. "Manuel",
- [50] XAVIER "LNU", a.k.a. "Barbie",
- [51] FRANCISCO "LNU", a.k.a. "Bejuco",
- [52] RICHARD CESAREO-GONZALEZ, a.k.a. "Bubu",
- [53] JONATHAN SANTIAGO, a.k.a. "Titi West",
- [54] JOHN DOE #5, a.k.a. "Saca Crippyy",
- [55] CISKOULA GARCIA, a.k.a. "Zorillo", "Zorri",
- [56] JESUS M.TORRES-COSS, a.k.a. "Popo",
- [57] JOHN DOE #6, a.k.a. "Murmu",
- [58] FRANCIS GARCIA "LNU",
- [59] RAUL HERNANDEZ-COSS, a.k.a. "Baby",
- [60] JOHN DOE #7, a.k.a. "Antiguo",
- [61] JONATHAN RODRIGUEZ-SANTOS, a.k.a. "Bizcocho",
- [62] JOHN DOE #8, a.k.a. "Presis's Brother",
- [63] FREDDIE VILLEGAS-CIRINO, a.k.a. "Bebe Flow", "El Flow",
- [64] DENNYS NAVARRO-MORALES, a.k.a. "Gemelo",
- [65] JOHN DOE #9, a.k.a. "Changuito",
- [66] VICTOR LOPEZ-ORTIZ, a.k.a. "Luz Clarita", "Gandul",
- [67] RAMON SOTO-ALAMO, a.k.a. "Justi",
- [68] MARIANO BERMUDEZ-MAYSONET, a.k.a. "Ralph",
- [69] HOMMY PEREZ-CIRINO, a.k.a. "Homito",
- [70] ANGEL HUERTAS-TORRES, a.k.a. "Tego",

the defendants herein, did knowingly and intentionally conspire, combine, and agree with each other and diverse other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, to possess firearms and ammunition during and in relation to a drug trafficking crime as charged in Counts One through Five of this Indictment, which offenses may be prosecuted in a Court of the United States, in violation of Title 18, United States Code, Section 924(c)(1)(A); all in violation of Title 18, United States Code, Section 924(o).

NARCOTICS FORFEITURE ALLEGATION

1. The allegations contained in Counts One through Six of this Indictment are hereby re-

alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a)(1), 982(a)(2) and 853.

2. Upon conviction of one or more of the controlled substance offenses alleged in Counts One through Six of this Indictment, each defendant so convicted shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 841, 846, 960, 963 and 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

A. Money Judgement

A sum of money of at least SIXTY FIVE MILLION DOLLARS (\$65,000,000.00) in United States currency, representing the amount of proceeds obtained as a result of the offense charged in Count One, that is, Title 21, United States Code, Section 846, for which any so convicted defendants are jointly and severally liable.

3. 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 two (2), if, by any act or omission of the defendant, the property described in paragraph two (2), 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, including but not limited to:

PROPERTY AS TO DEFENDANT:

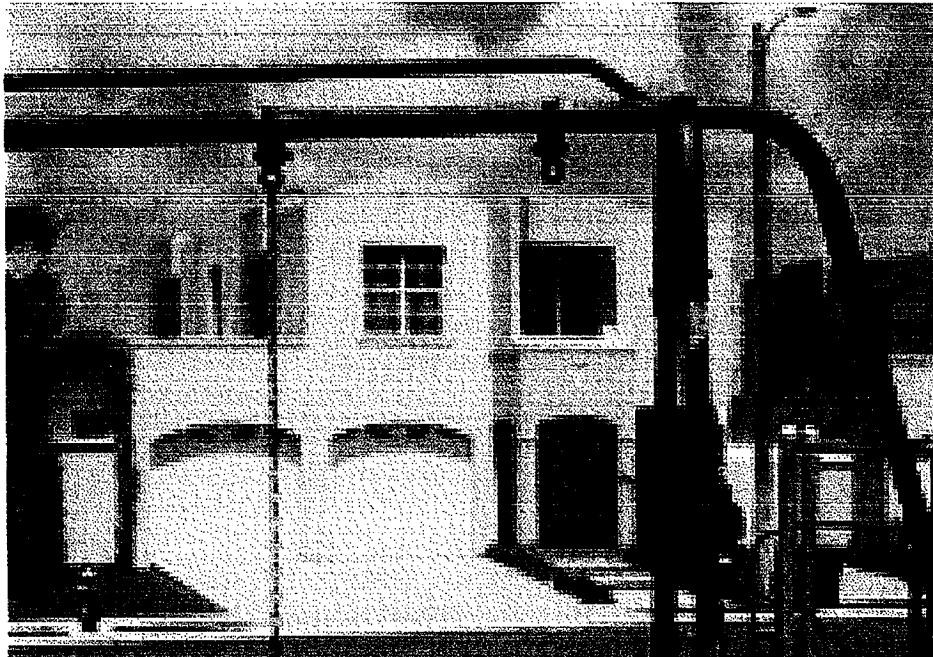
[1] HAROLD FIGUEROA-SANCHEZ, a.k.a. "Casco", "Gordo", "Cabeza";

a. One Urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Ciénega Baja, Río Grande, Puerto Rico, more particularly described as:

URBANA: Solar número 3 del bloque "E" (E-3) de la Urbanización Pedregales radicado en el Barrio Ciénega Baja del término municipal de Río Grande, Puerto Rico, con una cabida de 348.410 metros cuadrados, equivalentes aproximadamente 0.0887 cuerda. Colinda por el NORTE, en una distancia de 24.00 metros, con el solar No. 4 del bloque E, (E-4); por el SUR, en una distancia de 23.982 metros, con el solar No. 2 del bloque E, (E-2); por el ESTE, en una distancia de 14.064 metros, con la Calle No. 38; y por el OESTE, en dos distancias de 13.931 metros y otra de 1.021 metros con los solares Nos. 10 y 11 del bloque E, (E-10 y E-11). Enclava una casa.

FINCA #25,297, inscrita al folio 71 del tomo 493 de Río Grande. (Registro de la Propiedad, Sección Tercera de Carolina, Puerto Rico).

REGISTERED OWNER: ANA E. REYES-CAPPOBIANCO



b. One Urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Canovanillas, Carolina, Puerto Rico, more particularly described as:

URBANA: Solar 7 de la manzana "H" en la Urbanización Residencial Parque Ecuestre , (Valle Carolina), en el Barrio Canovanillas, de Carolina, compuesto de 352.44 metros cuadrados. En lindes por el NORTE, con la Calle 5, distancia de 14.57 metros; por el SUR, con los solares 20 y 21, distancia de 13.53 metros; por el ESTE, con el solar 8, distancia de 25.50 metros; y por el OESTE, con el solar 6, distancia de 24.65 metros. Contiene una casa de concreto para una familia.

FINCA #34,292, inscrita al folio 73 del tomo 1350 de Carolina. (Registro de la Propiedad, Sección Segunda de Carolina, Puerto Rico).

REGISTERED OWNER: ANA ESTHER REYES CAPPOBIANCO



c. One Urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Sabana Abajo, Carolina, Puerto Rico, more particularly described as:

URBANA: Solar radicado en la Urbanización Sabana Gardens, situado en el Barrio Sabana Abajo de Carolina, que se describe con el No. 21, de la manzana 23, con un área de 701.23 metros cuadrados, en lindes por el NORTE, con paseo público, distancia de 27.558 metros; por el SUR, con la Calle Limarin, y un arco de 10.645 metros y el solar No. 20, en distancia de 31.241 metros; por el ESTE, con el solar No. 22, en distancia de 25.427 metros; y por el OESTE, con paseo público, en distancia de 13.191 metros. Contiene una casa de concreto para fines residenciales.

FINCA #8,207 (antes 14,614), inscrita al folio 126 del tomo 2193 de Carolina. (Registro de la Propiedad, Sección Primera de Carolina, Puerto Rico).

REGISTERED OWNER: LUIS MARIN-TORRES.



PROPERTY AS TO DEFENDANT:

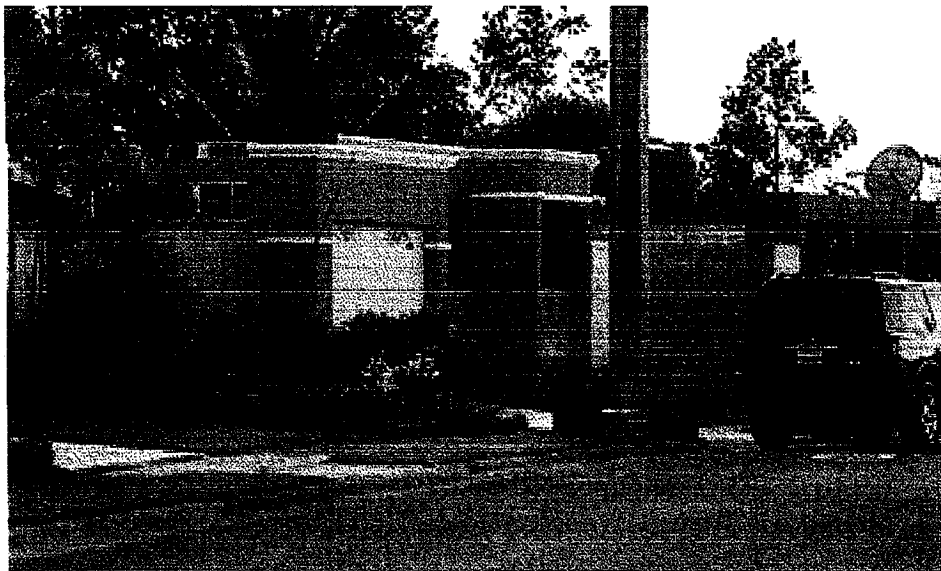
[2] ANIBAL ESCOBAR-SANCHEZ, a.k.a. "NBA", "Siete Pisos";

d. One Urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Camarones, Canóvanas, Puerto Rico, more particularly described as:

URBANA: Parcela identificada en el plano de inscripción como el solar No. 7 del bloque "E" de la Urbanización Estancias del Río, localizada en el Barrio Canóvanas del Municipio de Canóvanas, con una cabida superficial de 367.8888 metros cuadrados. En lindes por el NORTE, con la Calle "H"; por el SUR, con "Green Area" y "Retention Pond" por el ESTE, con el solar 6 del bloque "E"; por el OESTE, con el solar 8 del bloque "E". Enclava una residencia de concreto de una planta. Este solar está afectado por una servidumbre de paso de 5 pies de ancho a favor de La Puerto Rico Telephone Company, que discurre a todo lo largo de su colindancia NORTE, en adelante denominada la "propiedad segregada".

TRACTO REGISTRAL: Se segrega de la finca No. 12,659, inscrita al folio móvil del tomo 351 de Canóvanas.

REGISTERED OWNER: Presentada y pendiente de inscripción a favor de LUZ MARIA GARCIA-RAMOS.



PROPERTY AS TO DEFENDANT:

[3] JOSE GONZALEZ-GARCIA a.k.a "Fafi";

e. One Urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Canóvanas, Canóvanas, Puerto Rico, more particularly described as:

URBANA: Parcela identificada en el plano de inscripción como el solar No. 7 del bloque "H" de la Urbanización Estancias del Río, localizada en el Barrio Canóvanas del Municipio de Canóvanas, con una cabida superficial de 798.3058 metros cuadrados. En lindes por el NORTE, con el solar No. 9 del bloque "G" y con la Calle "G"; por el SUR, con el solar No. 6 del bloque "H"; por el ESTE, con solar No. 8 del bloque "H"; y por el OESTE, con el Río Canóvanas. Enclava en dicho solar una residencia de concreto de una planta. Este solar está afectado por una servidumbre de paso de 5' pies de ancho a favor de la Puerto Rico Telephone Company, que discurre a todo lo largo de su colindancia Norte. Enclava una casa.

TRACTO REGISTRAL: Se segrega de la finca No. 12,659, inscrita al folio móvil del tomo 351 de Canóvanas.

REGSITERED OWNER: Presentada y pendiente de inscripción a favor de MANUEL BIENVENIDO SANTANA CABREJAS y su esposa JACKELINE VALVERDE RODRIGUEZ.




All in accordance with Title 21, United States Code, Section 853 and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

TRUE BILL

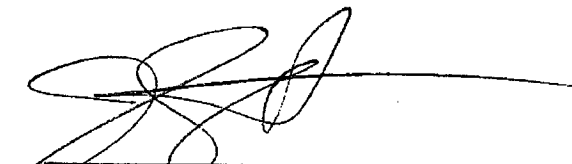
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Date: May 5, 2010

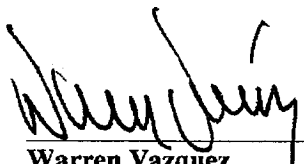
ROSA EMILIA RODRIGUEZ-VELEZ
United States Attorney




José Ruiz-Santiago
Assistant United States Attorney
Chief Criminal Division



José Capó-Iriarte
Assistant United States Attorney



Warren Vazquez
Assistant United States Attorney
Chief Violent Crimes



Alberto R. López-Rocafort
Special Assistant United States Attorney