

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

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UNITED STATES OF AMERICA,
Plaintiff,

v.

- [1] HERNANDO MARIN-ECHEVERRI,
a/k/a "Nando," (Counts 1 - 3)
- [2] RICARDO TORRES-RIVERA,
a/k/a "Ricky," (Counts 1 - 3)
- [3] ARMANDO RIVERA-ORTIZ, (Counts 1 - 3)
- [4] YARIMAR RODRIGUEZ-MERCADO,
a/k/a "La Tia," "Yari," "Pablito," "Titi," (Counts 1 - 2)
- [5] RODOLFO REYES-SANTANA,
a/k/a "Papote," (Counts 1 - 2)
- [6] CARLOS FERNANDO SAAVEDRA-POTES,
a/k/a "Fernando," (Counts 1 - 3)
- [7] MANUEL REINEL MARTINEZ-SALAS,
a/k/a "Chino," (Counts 1 - 3)
- [8] CHRISTIAN LUIS MARTINEZ-ROBLES, (Counts 1 - 3)
- [9] EDUARDO RAFAEL CAMPO-CARVAJALINO,
a/k/a "Tocayo," (Counts 1 - 3)
- [10] LUCY STELLA GOMEZ-LOPERA,
a/k/a "La Flaca," (Counts 1 - 3)
- [11] JAIME ERNESTO MONTOYA-GOMEZ,
a/k/a "Risitas," (Counts 1 - 2)
- [12] JORGE AQUILES BERRIOS-VEGA,
a/k/a "Maracucho," (Counts 1 - 2)
- [13] PAULA ANDREA GAVANZO-RUIZ, (Counts 1 - 2)
- [14] LUIS MEDINA-CHAVEZ, (Count 3)
- [15] SARIANN RAMOS-MALDONADO,
a/k/a "Sara," "Sarita," (Count 3)
- [16] NILSON ARISTIZABAL-TEZNA, (Count 3)
- [17] JANNETTE SAAVEDRA-ECHEVARRIA, (Count 3)
- [18] JOSE LUIS CASTRO-DELGADO, (Count 1 - 2)
- [19] ERIKA CASILLAS-BONET, (Count 1 - 2)

Defendants.

INDICTMENT
U.S. DISTRICT COURT
SAN JUAN, PR

Criminal No. 13- 597 (ADC)

Violations:

Count One:
Title 21, United States Code, Sections
846 and 841(a)(1) & (b)(1)(A)(i);

Count Two:
Title 21, United States Code, Sections
952(a) & 963;

Count Three:
Title 18, United States Code, Section
1956(h) & 1956(a)(1)(B)(i)

THREE COUNTS and NARCOTICS
& MONEY LAUNDERING
FORFEITURE ALLEGATIONS

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THE GRAND JURY CHARGES:

COUNT ONE

**Conspiracy to Possess with Intent to Distribute Controlled Substances
Title 21, United States Code, Sections 846 and 841(a)(1) & (b)(1)(A)(i)**

From in or about August 2012 through in or about April 2013, in the District of Puerto Rico
and within the jurisdiction of this Court,

- [1] HERNANDO MARIN-ECHEVERRI, a/k/a “Nando,”
- [2] RICARDO TORRES-RIVERA, a/k/a “Ricky,”
- [3] ARMANDO RIVERA-ORTIZ,
- [4] YARIMAR RODRIGUEZ-MERCADO, a/k/a “La Tia,” “Yari,” “Pablito,” “Titi,”
- [5] RODOLFO REYES-SANTANA, a/k/a “Papote,”
- [6] CARLOS FERNANDO SAAVEDRA-POTES, a/k/a “Fernando,”
- [7] MANUEL REINEL MARTINEZ-SALAS, a/k/a “Chino,”
- [8] CHRISTIAN LUIS MARTINEZ-ROBLES,
- [9] EDUARDO RAFAEL CAMPO-CARVAJALINO, a/k/a “Tocayo,”
- [10] LUCY STELLA GOMEZ-LOPERA, a/k/a “Flaca,”
- [11] JAIME ERNESTO MONTOYA-GOMEZ, a/k/a “Risitas,”
- [12] JORGE AQUILES BERRIOS-VEGA, a/k/a “Maracucho,”
- [13] PAULA ANDREA GAVANZO-RUIZ,
- [18] JOSE LUIS CASTRO-DELGADO,
- [19] ERIKA CASILLAS-BONET,

the defendants herein, did knowingly and intentionally combine, conspire, and agree with each other and with diverse other persons unknown to the Grand Jury, to commit an offense against the United States, that is: to 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. All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) & (b)(1)(A)(i).

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OBJECT OF THE CONSPIRACY

It was the object of the conspiracy, among others, to import into Puerto Rico, from a place outside the United States, multi kilograms of heroin, for distribution.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants would accomplish and further the objects of the conspiracy, **among others**, included the following:

1. Defendant Hernando Marin-Echeverri, based in Colombia, would communicate with defendants in Puerto Rico to coordinate the smuggling, importation, transportation and distribution of heroin into Puerto Rico.
2. Defendants, acting as couriers, would travel into Venezuela to meet with defendants who would provide suitcases with heroin hidden inside.
3. Defendants, based in Colombia, would be responsible for preparing and hiding the heroin inside suitcases; transport the suitcases from Colombia into Venezuela and deliver the suitcases to the couriers.
4. Defendants would transport and deliver drug proceeds, from Puerto Rico, to defendants in Venezuela.
5. Defendants would send drug proceeds from Puerto Rico to Colombia, through electronic wire transfers.
6. Defendants would conceal and disguise the nature, location, source, ownership and control of the illegal proceeds obtained from drug trafficking.

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7. Defendants would also use the United States Postal Service to send heroin laden parcels into Puerto Rico.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) & (b)(1)(A)(i).

COUNT TWO

**Conspiracy to import controlled substances
Title 21, United States Code, Section 952(a) & 963**

From in or about August 2012 through in or about April 2013, in the District of Puerto Rico and within the jurisdiction of this Court,

- [1] HERNANDO MARIN-ECHEVERRI, a/k/a "Nando,"
- [2] RICARDO TORRES-RIVERA, a/k/a "Ricky,"
- [3] ARMANDO RIVERA-ORTIZ,
- [4] YARIMAR RODRIGUEZ-MERCADO, a/k/a "La Tia," "Yari," "Pablito," "Titi,"
- [5] RODOLFO REYES-SANTANA, a/k/a "Papote,"
- [6] CARLOS FERNANDO SAAVEDRA-POTES, a/k/a "Fernando,"
- [7] MANUEL REINEL MARTINEZ-SALAS, a/k/a "Chino,"
- [8] CHRISTIAN LUIS MARTINEZ-ROBLES,
- [9] EDUARDO RAFAEL CAMPO-CARVAJALINO, a/k/a "Tocayo,"
- [10] LUCY STELLA GOMEZ-LOPERA, a/k/a "Flaca,"
- [11] JAIME ERNESTO MONTOYA-GOMEZ, a/k/a "Risitas,"
- [12] JORGE AQUILES BERRIOS-VEGA, a/k/a "Maracucho,"
- [13] PAULA ANDREA GAVANZO-RUIZ,
- [18] JOSE LUIS CASTRO-DELGADO,
- [19] ERIKA CASILLAS-BONET,

the defendants herein, did knowingly and intentionally combine, conspire, and agree with each other and with diverse other persons unknown to the Grand Jury, to commit an offense against the United States, that is, to import into the United States, from a place outside thereof, **one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin**, a Schedule I Narcotics Drug Controlled Substance, in violation of Title 21, United States Code, Sections 952(a) & 963.

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COUNT THREE

**Conspiracy to Launder Monetary Instruments
Title 18, United States Code, Sections 1956(h) & 1956(a)(1)(B)(i)**

From in or about August 2012 through in or about April 2013, in the District of Puerto Rico and elsewhere,

- [1] **HERNANDO MARIN-ECHEVERRI, a/k/a “Nando,”**
- [2] **RICARDO TORRES-RIVERA, a/k/a “Ricky,”**
- [3] **ARMANDO RIVERA-ORTIZ,**
- [6] **CARLOS FERNANDO SAAVEDRA-POTES, a/k/a “Fernando,”**
- [7] **MANUEL REINEL MARTINEZ-SALAS, a/k/a “Chino,”**
- [8] **CHRISTIAN LUIS MARTINEZ-ROBLES,**
- [9] **EDUARDO RAFAEL CAMPO-CARVAJALINO, a/k/a “Tocayo,”**
- [10] **LUCY STELLA GOMEZ-LOPERA, a/k/a “Flaca,”**
- [14] **LUIS MEDINA-CHAVEZ,**
- [15] **SARIANN RAMOS-MALDONADO, a/k/a “Sara,” Sarita,”**
- [16] **NILSON ARISTIZABAL-TEZNA,**
- [17] **JANNETTE SAAVEDRA-ECHEVARRIA,**

the defendants herein, did knowingly combine, conspire, and agree with each other and with other persons unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, the felonious importation, receiving, concealment, buying, selling, or otherwise dealing in controlled substances (as defined in section 102 of the Controlled Substances Act), punishable under any law of the United States including Title 21, United States Code, Sections 841(a)(1), 846, 952(a) 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

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conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(1)(B)(i).

OBJECT OF THE CONSPIRACY

It was the object of the conspiracy, to conceal and disguise the nature, location, source, ownership and control of drug trafficking proceeds derived by the defendants and others known and unknown to the Grand Jury.

MANNER AND MEANS

The manner and means by which the defendants would accomplish and further the objects of the conspiracy, among others, included the following:

1. Defendants would send drug proceeds from Puerto Rico to Colombia, through electronic wire transfers.
2. Defendants would conceal and disguise the nature, location, source, ownership and control of the illegal proceeds obtained from drug trafficking.
3. Proceeds would be sent and received using the names of individuals who were not participants of the drug trafficking organization.

DRUG FORFEITURE ALLEGATIONS

Title 21, United States Code, Sections 853 and 881

The allegations contained in Counts ONE and TWO of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Sections 853 and 881.

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Upon conviction of the offense(s) alleged in this Indictment, pursuant to Title 21, United States Code, Sections 853 and 881,

- [1] HERNANDO MARIN-ECHEVERRI, a/k/a “Nando,”
- [2] RICARDO TORRES-RIVERA, a/k/a “Ricky,”
- [3] ARMANDO RIVERA-ORTIZ,
- [4] YARIMAR RODRIGUEZ-MERCADO, a/k/a “La Tia,” “Yari,” “Pablito,” “Titi”
- [5] RODOLFO REYES-SANTANA, a/k/a “Papote,”
- [6] CARLOS FERNANDO SAAVEDRA-POTES, a/k/a “Fernando,”
- [7] MANUEL REINEL MARTINEZ-SALAS, a/k/a “Chino,”
- [8] CHRISTIAN LUIS MARTINEZ-ROBLES,
- [9] EDUARDO RAFAEL CAMPO-CARVAJALINO, a/k/a “Tocayo,”
- [10] LUCY STELLA GOMEZ-LOPERA, a/k/a “Flaca,”
- [11] JAIME ERNESTO MONTOYA-GOMEZ,
- [12] JORGE AQUILES BERRIOS-VEGA, a/k/a “Maracucho,”
- [13] PAULA ANDREA GAVANZO-RUIZ,
- [14] LUIS MEDINA-CHAVEZ,
- [15] SARIANN RAMOS-MALDONADO, a/k/a “Sara,” “Sarita,”
- [16] NILSON ARISTIZABAL-TEZNA,
- [17] JANNETTE SAAVEDRA-ECHEVARRIA,
- [18] JOSE LUIS CASTRO-DELGADO,
- [19] ERIKA CASILLAS-BONET,

the defendants herein, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses.

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

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e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

MONEY LAUNDERING FORFEITURE ALLEGATIONS
Title 18, United States Code, Section 982

The allegations contained in Count THREE of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(1).

Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1956,

- [1] HERNANDO MARIN-ECHEVERRI, a/k/a "Nando,"
- [2] RICARDO TORRES-RIVERA, a/k/a "Ricky,"
- [3] ARMANDO RIVERA-ORTIZ,
- [6] CARLOS FERNANDO SAAVEDRA-POTES, a/k/a "Fernando,"
- [7] MANUEL REINEL MARTINEZ-SALAS, a/k/a "Chino,"
- [8] CHRISTIAN LUIS MARTINEZ-ROBLES,
- [9] EDUARDO RAFAEL CAMPO-CARVAJALINO, a/k/a "Tocayo,"
- [10] LUCY STELLA GOMEZ-LOPERA, a/k/a "Flaca,"
- [14] LUIS MEDINA-CHAVEZ,
- [15] SARIANN RAMOS-MALDONADO, a/k/a "Sara," "Sarita,"
- [16] NILSON ARISTIZABAL-TEZNA,
- [17] JANNETTE SAAVEDRA-ECHEVARRIA,

the defendants herein, shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited includes, but is not limited to the following: at least \$37,000.00 in U.S. Currency.

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If any of the property described above, as a result of any act or omission of the defendants:

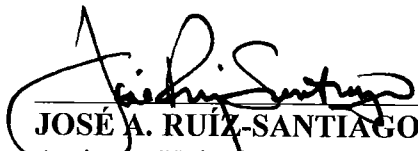
- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be divided without difficulty,


the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).


ROSA EMILIA RODRIGUEZ-VELEZ
UNITED STATES ATTORNEY

TRUE BILL

FOREPERSON 8/23/13


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