2015 FEB 19 1 PH 4

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

UNITED STATES OF AMERICA, Plaintiff,

v.

[1] JOSE L. COLON-PANETO,

a/k/a "Walter",

(Counts ONE through SIX)

[2] JOSE A. COLON-PANETO,

a/k/a "Jun",

(Counts ONE through SIX)

[3] JONATHAN VARGAS-TORRES,

a/k/a "Johny", "Corozo",

(Counts ONE through SIX)

[4] CHRISTIAN VARGAS-TORRES,

a/k/a "Chola", "Cholon", "Vargas", "Corozo",

(Counts ONE through SIX)

[5] RICARDO CAMACHO,

a/k/a "Ricardito", "Tito-Ricardo",

(Counts ONE through SIX)

[6] JOHN-JOHN MALDONADO-PANETO,

a/k/a "John-John",

(Counts ONE through SIX)

[7] JESUS SANTIAGO-BRACERO,

a/k/a "Jesus Payaso",

(Counts ONE through FIVE)

[8] CARLOS MANUEL PEREZ-LUGO,

a/k/a "Chiqui-Moya",

(Counts ONE through SIX)

[9] JULIO ALBERTO MILLAN-IRIZARRY,

a/k/a "Berti", "Julito",

(Counts ONE through FIVE)

[10] BALDO ANTHONY CANCEL-PEREZ,

a/k/a "Anthony", "Enano",

(Counts ONE through SIX)

[11] FERNANDO PACHECO-ORTIZ,

a/k/a "Chinito".

(Counts ONE through FIVE)

[12] LUIS ALBERTO FIGUEROA-PAGAN,

a/k/a "Kiri",

(Counts ONE through FIVE)

[13] CHRISTIAN XAVIER TORRES-RIVERA,

a/k/a "Pitito",

INDICTMENT

FILED UNDER SEAL

CRIMINAL NO. 15- 137 (GAG)

Violations:

(COUNT ONE)

Title 21, United States Code, §§ 841(a)(1),

846, and 860

(COUNT TWO)

Title 21, <u>United States Code</u>, §§ 841(a)(1) and 860 and Title 18, <u>United States Code</u>, §

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(COUNT THREE)

Title 21, <u>United States Code</u>, §§841(a)(1) and 860 and Title 18, United States Code, §

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(COUNT FOUR)

Title 21, United States Code, §§ 841(a)(1)

and 860 and Title 18, United States Code, §

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(COUNT FIVE)

Title 21, United States Code, §§ 841(a)(1)

and 860 and Title 18, <u>United States Code</u>, §

(COUNT SIX)

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

Narcotics Forfeiture Allegation

Title 21, United States Code, § 853 and

Rule 32.2(a) F.R.C.P.

(SIX COUNTS)

(Counts ONE through SIX) [14] WILSON R. SANTIAGO-BRACERO, a/k/a "Tempo", "Gordo Payaso", (Counts ONE through FIVE) [15] RAYMOND L. LAMBERTY-TORRES, a/k/a "Lamberty", (Counts ONE through FIVE) [16] JOHN PAUL RIVERA SANTIAGO, a/k/a "John Paul", "Popo" (Counts ONE through FIVE) [17] RADAMES MEDINA-IRIZARRY, a/k/a "Rada", (Counts ONE through FIVE) [18] LUIS GABRIEL QUINONES-PADILLA, a/k/a "Mona", (Counts ONE through FIVE) [19] MANUEL DE JESUS-CASTRO, a/k/a "Manolo", "Mayorca", (Counts ONE through FIVE) [20] JUAN RAMON FLORES-COLON, a/k/a "Monchi", (Counts ONE through FIVE) [21] ADELA PANETO-SOTO, a/k/a "Adela", (Counts ONE through FIVE) [22] MELVIN MEDINA-CARABALLO, a/k/a "Melvito", "Pichi", "Melvo", (Counts ONE through FIVE) [23] PRETT ONELL SANTA -TORRES, a/k/a "Pre", (Counts ONE through FIVE) [24] ALEXIS JAVIER APONTE-NEGRON, a/k/a "Alexis", (Counts ONE through FIVE) [25] DANIEL RODRIGUEZ-SANTIAGO, a/k/a "Viejo Danny", "Danny Pinto", (Counts ONE through FIVE)

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

Conspiracy to Possess with Intent to Distribute Controlled Substances

Beginning in or about 2007, and continuing up to and until the return of the instant Indictment, in the Municipality of Yauco, District of Puerto Rico and within the jurisdiction of this Court,

- [1] JOSE L. COLON-PANETO, a/k/a "Walter",
- [2] JOSE A. COLON-PANETO, a/k/a "Jun",
- [3] JONATHAN VARGAS-TORRES, a/k/a "Johny", "Corozo",
- [4] CHRISTIAN VARGAS-TORRES, a/k/a "Chola", "Cholon", "Vargas", "Corozo",
- [5] RICARDO CAMACHO, a/k/a "Ricardito", "Tito-Ricardo",
- [6] JOHN-JOHN MALDONADO-PANETO, a/k/a "John-John",
- [7] JESUS SANTIAGO-BRACERO, a/k/a "Jesus Payaso",
- [8] CARLOS MANUEL PEREZ-LUGO, a/k/a "Chiqui-Moya",
- [9] JULIO ALBERTO MILLAN-IRIZARRY, a/k/a "Berti", "Julito",
- [10] BALDO ANTHONY CANCEL-PEREZ, a/k/a "Anthony", "Enano",
- [11] FERNANDO PACHECO-ORTIZ, a/k/a "Chinito",
- [12] LUIS ALBERTO FIGUEROA-PAGAN, a/k/a "Kiri",
- [13] CHRISTIAN XAVIER TORRES-RIVERA, a/k/a "Pitito",
- [14] WILSON R. SANTIAGO-BRACERO, a/k/a "Tempo", "Gordo Payaso",
- [15] RAYMOND L. LAMBERTY-TORRES, a/k/a "Lamberty",
- [16] JOHN PAUL RIVERA SANTIAGO, a/k/a "John Paul", "Popo"
- [17] RADAMES MEDINA-IRIZARRY, a/k/a "Rada",
- [18] LUIS GABRIEL QUINONES-PADILLA, a/k/a "Mona",
- [19] MANUEL DE JESUS-CASTRO, a/k/a "Manolo", "Mayorca",
- [20] JUAN RAMON FLORES-COLON, a/k/a "Monchi",
- [21] ADELA PANETO-SOTO, a/k/a "Adela",
- [22] MELVIN MEDINA-CARABALLO, a/k/a "Melvito", "Pichi", "Melvo",
- [23] PRETT ONELL SAÑTA -TORRES, a/k/a "Pre",
- [24] ALEXIS JAVIER APONTE-NEGRON, a/k/a "Alexis",
- [25] DANIEL RODRIGUEZ-SANTIAGO, a/k/a "Viejo Danny", "Danny Pinto",

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: one (1) kilogram or more of a

mixture or substance containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance; two hundred and eighty (280) grams of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II Narcotic Drug Controlled Substance; five (5) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance; a mixture or substance containing a detectable amount of marijuana, a Schedule I, Controlled Substance; all within one thousand (1,000) feet of the real properties comprising housing facilities owned by a public housing authority, that is the Santa Catalina Public Housing Project, and the real properties comprising a public or private school and/or playground, that is the Santa Catalina public school. 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 Santa Catalina Public Housing Project located in Yauco, 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 coconspirators established drug distribution points in different areas inside the public
housing project. Some areas of drug distribution also include the areas between buildings
6, 13, 23, 24, 25; the constructions trailers, the basketball court and the community center
of the Santa Catalina Public Housing Project.

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- 2. It was further part of the means and manner of the conspiracy that the defendants and their co-conspirators would sell street quantities amounts of heroin, cocaine base ("crack"), cocaine, and marijuana in such drug point areas.
- 3. It was further part of the manner and means of the conspiracy that the defendants and their co-conspirators would purchase wholesale quantities of heroin, cocaine and marijuana in order to distribute the same in street quantity amounts at the drug distribution point in the Santa Catalina Public Housing Project.
- 4. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would weight, cut, divide and package heroin, cocaine base ("crack"), cocaine and marijuana in small "baggies", vials or packaging for subsequent sale at the above-mentioned drug distribution point.
- 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 leaders, drug point owners, runners and sellers of this organization would divide among themselves and their subordinates the proceeds of the drug trafficking sales. The "drug owners" would often receive proceeds from the sale of specific controlled substances.
- 7. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would often prepare the narcotics in empty apartments located within the Santa Catalina Public Housing Project.
- 8. It was further part of the manner and means of the conspiracy that some of the defendants

and their co-conspirators would use abandoned or empty apartments inside the Santa Catalina Public Housing Project and vehicles parked inside the the public housing project, in order to package and conceal the cocaine base ("crack"), cocaine, marijuana, furting, equipment, materials used to process and package the controlled substances (drug paraphernalia), firearms, magazines and ammunitions.

- 9. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would conceal ammunition, magazines and firearms in the apartments that were registered to other co-conspirators to avoid detection by law enforcement.
- 10. It was a further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would have access to different vehicles in order to transport money, narcotics and firearms. Also, these vehicles would often be used by some of the defendants and their co-conspirators to conduct drive by shootings and to go out and "hunt" rival gang members.
- 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 Santa Catalina Public Housing Project and/or members of the conspiracy, as well as rival gang members.
- 12. 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 maintain control of the drug trafficking operations, to intimidate rival drug trafficking organizations and to discipline members of their own drug trafficking organization.

- 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. At different points during the conspiracy, the leaders would provide to some members of the organization with different types of firearms, including but not limited to "high power" rifles, in order to protect themselves, the narcotics and their profits from rival drug trafficking gangs.
- 14. It was further part of the manner and means of the conspiracy that the defendants and their co-conspirators would act in different roles in order to further the goals of the conspiracy, to wit: leaders, drug point owners, suppliers, runners, enforcers, sellers, facilitators and look-outs.
- 15. 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.
- 16. 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) and cell phones in order to communicate and alert the presence of law enforcement agents or members of rival gangs and to communicate among themselves regarding the operations of the drug distribution point.
- 17. 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" to alert other co-conspirators of the presence of law enforcement agents and/or rival drug traffickers.
- 18. It was further part of the manner and means of the conspiracy that some of the defendants

and their co-conspirators build a "hand made" firearm that was remotely controlled with a beeper with the intention to shot at the enemies and law enforcement who entered the public housing project.

III. ROLES OF THE MEMBERS OF THE CONSPIRACY

A. Leaders/Drug Point Owners/ Drug Point Administrators

Leaders / drug point owners controlled and supervised the drug trafficking operations at the drug distribution points located within the Santa Catalina Public Housing Project in Yauco, Puerto Rico. During the span of the conspiracy, Leaders/ Drug Point Owners purchased kilogram quantities of narcotics and oversaw the sale of such narcotics at the drug distribution point. As "drug owners" they would receive proceeds from the sale of controlled substances distributed at the drug distribution point. 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. Leaders would also possess firearms in furtherance of the drug trafficking activities of the organization.

The following co-conspirators acted as leaders/ drug point owners in this organization:

- [1] JOSE L. COLON-PANETO, a/k/a "Walter",
- [2] JOSE A. COLON-PANETO, a/k/a "Jun",
- [3] JONATHAN VARGAS-TORRES, a/k/a "Johny, "Corozo",

B. 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. In addition to the abovementioned co-conspirators, the following individuals and others known and unknown to the Grand Jury, acted as enforcers for the drug trafficking organization:

- [4] CHRISTIAN VARGAS-TORRES, a/k/a "Chola", "Cholon", "Vargas", "Corozo",
- [5] RICARDO CAMACHO, a/k/a "Ricardito", "Tito-Ricardo",
- [6] JOHN-JOHN MALDONADO-PANETO, a/k/a "John-John",

C. Runners

The runners worked under the supervision of the leaders/drug point owners 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 points. 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 would also supervise the sellers and the daily activities at the drug point.

In addition to the above mentioned leaders, drug owners and enforcers that also acted as drug runners, the following co-conspirators and others known and unknown to this Grand Jury, acted as runners for the above described drug trafficking organization:

[7] JESUS SANTIAGO-BRACERO, a/k/a "Jesus Payaso",

- [8] CARLOS MANUEL PEREZ-LUGO, a/k/a "Chiqui-Moya",
- [9] JULIO ALBERTO MILLAN-IRIZARRY, a/k/a "Berti", "Julito",
- [10] BALDO ANTHONY CANCEL-PEREZ, a/k/a "Anthony", "Enano",
- [11] FERNANDO PACHECO-ORTIZ, a/k/a "Chinito",

E. Sellers

The sellers would distribute street quantity amounts of crack cocaine, cocaine and

marijuana. As sellers, they were accountable for the drug proceeds and the narcotics sold at the drug distribution points. At times, sellers would use two-way radios ("walkie-talkies", "scanners") and cell phones in order to communicate with other members of the conspiracy.

In addition to the above-mentioned leaders, 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:

- [12] LUIS ALBERTO FIGUEROA-PAGAN, a/k/a "Kiri",
- [13] CHRISTIAN XAVIER TORRES-RIVERA, a/k/a "Pitito",
- [14] WILSON R. SANTIAGO-BRACERO, a/k/a "Tempo", "Gordo Payaso",
- [15] RAYMOND L. LAMBERTY-TORRES, a/k/a "Lamberty",
- [16] JOHN PAUL RIVERA SANTIAGO, a/k/a "John Paul", "Popo"
- [17] RADAMES MEDINA-IRIZARRY, a/k/a "Rada",
- [18] LUIS GABRIEL QUINONES-PADILLA, a/k/a "Mona",
- [19] MANUEL DE JESUS-CASTRO, a/k/a "Manolo", "Mayorca",
- [20] JUAN RAMON FLORES-COLON, a/k/a "Monchi",
- [21] ADELA PANETO-SOTO, a/k/a "Adela",
- [22] MELVIN MEDINA-CARABALLO, a/k/a "Melvito", "Pichi", "Melvo",
- [23] PRETT ONELL SANTA -TORRES, a/k/a "Pre",
- [24] ALEXIS JAVIER APONTE-NEGRON, a/k/a "Alexis",
- [25] DANIEL RODRIGUEZ-SANTIAGO, a/k/a "Viejo Danny", "Danny Pinto",

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

Aiding and Abetting in the Possession/Distribution of Heroin

Beginning in or about 2007, and continuing up to and until the return of the instant Indictment, in the Municipality of Yauco, District of Puerto Rico and within the jurisdiction of this Court,

- [1] JOSE L. COLON-PANETO, a/k/a "Walter",
- [2] JOSE A. COLON-PANETO, a/k/a "Jun",
- [3] JONATHAN VARGAS-TORRES, a/k/a "Johny", "Corozo",
- [4] CHRISTIAN VARGAS-TORRES, a/k/a "Chola", "Cholon", "Vargas", "Corozo",
- [5] RICARDO CAMACHO, a/k/a "Ricardito", "Tito-Ricardo",
- [6] JOHN-JOHN MALDONADO-PANETO, a/k/a "John-John",
- [7] JESUS SANTIAGO-BRACERO, a/k/a "Jesus Payaso",

- [8] CARLOS MANUEL PEREZ-LUGO, a/k/a "Chiqui-Moya",
- [9] JULIO ALBERTO MILLAN-IRIZARRY, a/k/a "Berti", "Julito",
- [10] BALDO ANTHONY CANCEL-PEREZ, a/k/a "Anthony", "Enano",
- [11] FERNANDO PACHECO-ORTIZ, a/k/a "Chinito",
- [12] LUIS ALBERTO FIGUEROA-PAGAN, a/k/a "Kiri",
- [13] CHRISTIAN XAVIER TORRES-RIVERA, a/k/a "Pitito",
- [14] WILSON R. SANTIAGO-BRACERO, a/k/a "Tempo", "Gordo Payaso",
- [15] RAYMOND L. LAMBERTY-TORRES, a/k/a "Lamberty",
- [16] JOHN PAUL RIVERA SANTIAGO, a/k/a "John Paul", "Popo"
- [17] RADAMES MEDINA-IRIZARRY, a/k/a "Rada",
- [18] LUIS GABRIEL QUINONES-PADILLA, a/k/a "Mona",
- [19] MANUEL DE JESUS-CASTRO, a/k/a "Manolo", "Mayorca",
- [20] JUAN RAMON FLORES-COLON, a/k/a "Monchi",
- [21] ADELA PANETO-SOTO, a/k/a "Adela",
- [22] MELVIN MEDINA-CARABALLO, a/k/a "Melvito", "Pichi", "Melvo",
- [23] PRETT ONELL SANTA -TORRES, a/k/a "Pre",
- [24] ALEXIS JAVIER APONTE-NEGRON, a/k/a "Alexis",
- [25] DANIEL RODRIGUEZ-SANTIAGO, a/k/a "Viejo Danny", "Danny Pinto",

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 properties comprising housing facilities owned by a public housing authority, that is the Santa Catalina Public Housing Project, and the real properties comprising a public or private school and/or playground, that is the Santa Catalina public school. All in violation of Title 21, <u>United States Code</u>, § 841(a)(1), 860; and Title 18, <u>United States Code</u>, § 2.

COUNT THREE

Aiding and Abetting in the Possession/Distribution of Cocaine Base

Beginning in or about 2007, and continuing up to and until the return of the instant Indictment, in the Municipality of Yauco, District of Puerto Rico and within the jurisdiction of this Court,

- [1] JOSE L. COLON-PANETO, a/k/a "Walter",
- [2] JOSE A. COLON-PANETO, a/k/a "Jun",
- [3] JONATHAN VARGAS-TORRES, a/k/a "Johny", "Corozo",
- [4] CHRISTIAN VARGAS-TORRES, a/k/a "Chola", "Cholon", "Vargas", "Corozo",
- [5] RICARDO CAMACHO, a/k/a "Ricardito", "Tito-Ricardo",
- [6] JOHN-JOHN MALDONADO-PANETO, a/k/a "John-John",

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- [7] JESUS SANTIAGO-BRACERO, a/k/a "Jesus Payaso",
- [8] CARLOS MANUEL PEREZ-LUGO, a/k/a "Chiqui-Moya",
- [9] JULIO ALBERTO MILLAN-IRIZARRY, a/k/a "Berti", "Julito",
- [10] BALDO ANTHONY CANCEL-PEREZ, a/k/a "Anthony", "Enano",
- [11] FERNANDO PACHECO-ORTIZ, a/k/a "Chinito",
- [12] LUIS ALBERTO FIGUEROA-PAGAN, a/k/a "Kiri",
- [13] CHRISTIAN XAVIER TORRES-RIVERA, a/k/a "Pitito",
- [14] WILSON R. SANTIAGO-BRACERO, a/k/a "Tempo", "Gordo Payaso",
- [15] RAYMOND L. LAMBERTY-TORRES, a/k/a "Lamberty",
- [16] JOHN PAUL RIVERA SANTIAGO, a/k/a "John Paul", "Popo"
- [17] RADAMES MEDINA-IRIZARRY, a/k/a "Rada",
- [18] LUIS GABRIEL QUINONES-PADILLA, a/k/a "Mona",
- [19] MANUEL DE JESUS-CASTRO, a/k/a "Manolo", "Mayorca",
- [20] JUAN RAMON FLORES-COLON, a/k/a "Monchi",
- [21] ADELA PANETO-SOTO, a/k/a "Adela",
- [22] MELVIN MEDINA-CARABALLO, a/k/a "Melvito", "Pichi", "Melvo",
- [23] PRETT ONELL SANTA -TORRES, a/k/a "Pre",
- [24] ALEXIS JAVIER APONTE-NEGRON, a/k/a "Alexis",
- [25] DANIEL RODRIGUEZ-SANTIAGO, a/k/a "Viejo Danny", "Danny Pinto",

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 properties comprising housing facilities owned by a public housing authority, that is the Santa Catalina Public Housing Project, and the real properties comprising a public or private school and/or playground, that is the Santa Catalina public school. All in violation of Title 21, <u>United States Code</u>, § 841(a)(1), 860; and Title 18, <u>United States Code</u>, § 2.

COUNT FOUR

Aiding and Abetting in the Possession/Distribution of Cocaine

Beginning in or about the year 2007, and continuing up to and until the return of the instant Indictment, in the Municipality of Yauco, District of Puerto Rico and within the jurisdiction of this Court,

- [1] JOSE L. COLON-PANETO, a/k/a "Walter",
- [2] JOSE A. COLON-PANETO, a/k/a "Jun",
- [3] JONATHAN VARGAS-TORRES, a/k/a "Johny", "Corozo",

- [4] CHRISTIAN VARGAS-TORRES, a/k/a "Chola", "Cholon", "Vargas", "Corozo",
- [5] RICARDO CAMACHO, a/k/a "Ricardito", "Tito-Ricardo",
- [6] JOHN-JOHN MALDONADO-PANETO, a/k/a "John-John",
- [7] JESUS SANTIAGO-BRACERO, a/k/a "Jesus Payaso",
- [8] CARLOS MANUEL PEREZ-LUGO, a/k/a "Chiqui-Moya",
- [9] JULIO ALBERTO MILLAN-IRIZARRY, a/k/a "Berti", "Julito",
- [10] BALDO ANTHONY CANCEL-PEREZ, a/k/a "Anthony", "Enano",
- [11] FERNANDO PACHECO-ORTIZ, a/k/a "Chinito",
- [12] LUIS ALBERTO FIGUEROA-PAGAN, a/k/a "Kiri",
- [13] CHRISTIAN XAVIER TORRES-RIVERA, a/k/a "Pitito",
- [14] WILSON R. SANTIAGO-BRACERO, a/k/a "Tempo", "Gordo Payaso",
- [15] RAYMOND L. LAMBERTY-TORRES, a/k/a "Lamberty",
- [16] JOHN PAUL RIVERA SANTIAGO, a/k/a "John Paul", "Popo"
- [17] RADAMES MEDINA-IRIZARRY, a/k/a "Rada",
- [18] LUIS GABRIEL QUINONES-PADILLA, a/k/a "Mona",
- [19] MANUEL DE JESUS-CASTRO, a/k/a "Manolo", "Mayorca",
- [20] JUAN RAMON FLORES-COLON, a/k/a "Monchi",
- [21] ADELA PANETO-SOTO, a/k/a "Adela",
- [22] MELVIN MEDINA-CARABALLO, a/k/a "Melvito", "Pichi", "Melvo",
- [23] PRETT ONELL SANTA -TORRES, a/k/a "Pre",
- [24] ALEXIS JAVIER APONTE-NEGRON, a/k/a "Alexis",
- [25] DANIEL RODRIGUEZ-SANTIAGO, a/k/a "Viejo Danny", "Danny Pinto",

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 properties comprising housing facilities owned by a public housing authority, that is the Santa Catalina Public Housing Project, and the real properties comprising a public or private school and/or playground, that is the Santa Catalina public school. All in violation of Title 21, <u>United States Code</u>, § 841(a)(1), 860; and Title 18, <u>United States Code</u>, § 2.

COUNT FIVE

Aiding and Abetting in the Possession/Distribution of Marijuana

Beginning in or about the year 2007, and continuing up to and until the return of the instant Indictment, in the Municipality of Yauco, District of Puerto Rico and within the jurisdiction of this Court,

- [1] JOSE L. COLON-PANETO, a/k/a "Walter",
- [2] JOSE A. COLON-PANETO, a/k/a "Jun",
- [3] JONATHAN VARGAS-TORRES, a/k/a "Johny", "Corozo",
- [4] CHRISTIAN VARGAS-TORRES, a/k/a "Chola", "Cholon", "Vargas", "Corozo",
- [5] RICARDO CAMACHO, a/k/a "Ricardito", "Tito-Ricardo",
- [6] JOHN-JOHN MALDONADO-PANETO, a/k/a "John-John",
- [7] JESUS SANTIAGO-BRACERO, a/k/a "Jesus Payaso",
- [8] CARLOS MANUEL PEREZ-LUGO, a/k/a "Chiqui-Moya",
- [9] JULIO ALBERTO MILLAN-IRIZARRY, a/k/a "Berti", "Julito",
- [10] BALDO ANTHONY CANCEL-PEREZ, a/k/a "Anthony", "Enano",
- [11] FERNANDO PACHECO-ORTIZ, a/k/a "Chinito",
- [12] LUIS ALBERTO FIGUEROA-PAGAN, a/k/a "Kiri",
- [13] CHRISTIAN XAVIER TORRES-RIVERA, a/k/a "Pitito",
- [14] WILSON R. SANTIAGO-BRACERO, a/k/a "Tempo", "Gordo Payaso",
- [15] RAYMOND L. LAMBERTY-TORRES, a/k/a "Lamberty",
- [16] JOHN PAUL RIVERA SANTIAGO, a/k/a "John Paul", "Popo"
- [17] RADAMES MEDINA-IRIZARRY, a/k/a "Rada",
- [18] LUIS GABRIEL OUINONES-PADILLA, a/k/a "Mona",
- [19] MANUEL DE JESUS-CASTRO, a/k/a "Manolo", "Mayorca",
- [20] JUAN RAMON FLORES-COLON, a/k/a "Monchi",
- [21] ADELA PANETO-SOTO, a/k/a "Adela",
- [22] MELVIN MEDINA-CARABALLO, a/k/a "Melvito", "Pichi", "Melvo",
- [23] PRETT ONELL SANTA -TORRES, a/k/a "Pre",
- [24] ALEXIS JAVIER APONTE-NEGRON, a/k/a "Alexis",
- [25] DANIEL RODRIGUEZ-SANTIAGO, a/k/a "Viejo Danny", "Danny Pinto",

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, within one thousand (1,000) feet of the real properties comprising housing facilities owned by a public housing authority, that is the Santa Catalina Public Housing Project, and the real properties comprising a public or private school and/or playground, that is the Santa Catalina public school. All in violation of Title 21, <u>United States Code</u>, §§ 841(a)(1), 860; and Title 18, <u>United States Code</u>, § 2.

COUNT SIX

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

Beginning in or about the year 2007, and continuing up to and until the return of the instant Indictment, in the Municipality of Yauco, District of Puerto Rico and within the jurisdiction of this

<u>United States of America vs.</u> <u>Jose L. Colon-Paneto a/k/a "Walter", et al.</u> <u>Page 15</u>

Court,

- [1] JOSE L. COLON-PANETO, a/k/a "Walter",
- [2] JOSE A. COLON-PANETO, a/k/a "Jun",
- [3] JONATHAN VARGAS-TORRES, a/k/a "Johny", "Corozo",
- [4] CHRISTIAN VARGAS-TORRES, a/k/a "Chola", "Cholon", "Vargas", "Corozo",
- [5] RICARDO CAMACHO, a/k/a "Ricardito", "Tito-Ricardo",
- [6] JOHN-JOHN MALDONADO-PANETO, a/k/a "John-John",
- [8] CARLOS MANUEL PEREZ-LUGO, a/k/a "Chiqui-Moya",
- [10] BALDO ANTHONY CANCEL-PEREZ, a/k/a "Anthony", "Enano",
- [13] CHRISTIAN XAVIER TORRES-RIVERA, a/k/a "Pitito",

the defendants herein, aiding and abetting each other, did knowingly and unlawfully possess firearms as that term is defined in Title 18, <u>United States Code</u>, Section 921(a)(3), in furtherance of drug trafficking crimes as charged in counts One (1) through Five (5) of the instant Indictment. All in violation of Title 18, <u>United States Code</u>, § 924(c)(1)(A) and 2.

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NARCOTICS FORFEITURE ALLEGATION

The Grand Jury further finds that:

- 1. Upon conviction of one or more of the offenses alleged in Counts One (1) through Six (6) of this Indictment, pursuant to Title 21, <u>United States Code</u>, Section 853 and Title 18, <u>United States Code</u>, 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:
- a. All right, title, and interest in any and all property involved in each offense in violation of Title 21, <u>United States Code</u>, Sections 841, 846, 860 and 853 for which the defendants are convicted, and all property traceable to such property, including the following: 1) all commissions, fees and other property constituting proceeds, directly or indirectly, obtained as a result of those violations; and 2) all property used in any manner or part to commit or to facilitate the commission of those violations. The property to be forfeited includes, but is not limited to, the following:
- i. A sum of money in U.S. Currency equal to the amount of proceeds obtained as a result of any of the offenses described in the instant Indictment for which the defendants are jointly and severally liable. 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.
- 2. Pursuant to Title 21, <u>United States Code</u>, Section 853(p), as incorporated by Title 18, <u>United States Code</u>, 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, <u>United States Code</u>, Sections 853 and 982(a)(1) and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

TRUE BILL

FOREPERS

Date:

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

Maria L. Montanez-Concepcion

Special Assistant United States Attorney