

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

FILED

GRAND JURY N-11-4

2011 NOV 10 P 4: 52

UNITED STATES OF AMERICA

CRIMINAL NO.

U.S. DISTRICT COURT
NEW HAVEN, CT

v.

VIOLATIONS:

JOHNNY SERRANO, a.k.a. "BEY BEY";
ALEXANDER ALVARADO, a.k.a. "ALEX";
RICARDO AQUINO, a.k.a. "RICKY";
MARK FORMICA, a.k.a. "MIKE";
EMMANUEL ORTIZ, a.k.a. "EMMA";
JOSE LUIS ORTIZ, a.k.a. "TONY";
LUIS ORTIZ, a.k.a. "BIG NOSE";
JAVIER SERRANO, a.k.a. "JAVI";
JOSE SERRANO, a.k.a. "JOSE";
RAYMOND SERRANO, a.k.a. "MACHO";
and
MIGUEL TORRES, a.k.a. "CHUCKY"

21 U.S.C. §§ 841(a)(1),
841(b)(1)(B)(iii), 841(b)(1)(C) and 846
(Conspiracy to Distribute and to
Possess With Intent to Distribute 28
Grams or More of Cocaine Base,
Cocaine, and Heroin)

21 U.S.C. §§ 841(a)(1) and
841(b)(1)(C)
(Distribution of and Possession With
Intent to Distribute Cocaine Base
and Cocaine)

18 U.S.C. § 2 (Aiding and Abetting)

21 U.S.C. § 853 (Criminal
Forfeiture)

INDICTMENT

The Grand Jury charges:

COUNT ONE

(Conspiracy to Distribute and to Possess with Intent to Distribute
28 Grams or More of Cocaine Base, Cocaine, and Heroin)

1. From approximately May 2011 to on or about November 10, 2011, the exact dates being unknown to the Grand Jury, in the District of Connecticut and elsewhere, the defendants, JOHNNY SERRANO, a.k.a. "BEY BEY"; ALEXANDER ALVARADO, a.k.a. "ALEX"; RICARDO AQUINO, a.k.a. "RICKY"; MARK

FORMICA, a.k.a. "MIKE"; EMMANUEL ORTIZ, a.k.a. "EMMA"; JOSE LUIS ORTIZ, a.k.a. "TONY"; LUIS ORTIZ, a.k.a. "BIG NOSE"; JAVIER SERRANO, a.k.a. "JAVI"; JOSE SERRANO, a.k.a. "JOSE"; RAYMOND SERRANO, a.k.a. "MACHO"; and MIGUEL TORRES, a.k.a. "CHUCKY," and Antovany Acosta and Ramon Gomez, a.k.a. "Moncho," who are charged in a separate indictment and not named as defendants herein, together with others known and unknown to the Grand Jury, did knowingly and intentionally conspire to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that the defendants, JOHNNY SERRANO, a.k.a. "BEY BEY"; ALEXANDER ALVARADO, a.k.a. "ALEX"; RICARDO AQUINO, a.k.a. "RICKY"; MARK FORMICA, a.k.a. "MIKE"; EMMANUEL ORTIZ, a.k.a. "EMMA"; JOSE LUIS ORTIZ, a.k.a. "TONY"; LUIS ORTIZ, a.k.a. "BIG NOSE"; JAVIER SERRANO, a.k.a. "JAVI"; JOSE SERRANO, a.k.a. "JOSE"; RAYMOND SERRANO, a.k.a. "MACHO"; and MIGUEL TORRES, a.k.a. "CHUCKY," and Antovany Acosta and Ramon Gomez, a.k.a. "Moncho," who are charged in a separate indictment and not named as defendants herein, together with others known and unknown to the Grand Jury, would distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances involved in the offense were: (1) 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code,

Sections 841(a)(1) and 841(b)(1)(B)(iii); (2) a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and (3) a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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

COUNT TWO

(Possession with Intent to Distribute and Distribution of Cocaine Base)

4. On or about May 21, 2011, in the District of Connecticut, the defendant, JOHNNY SERRANO, a.k.a. "BEY BEY," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

(Possession with Intent to Distribute and Distribution of Cocaine Base and Cocaine)

5. On or about July 15, 2011, in the District of Connecticut, the defendants, JOHNNY SERRANO, a.k.a. "BEY BEY," and ALEXANDER ALVARADO, a.k.a. "ALEX," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable

amount of cocaine base and a mixture and substance containing a detectable amount of cocaine, Schedule II controlled substances.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOUR

(Possession with Intent to Distribute and Distribution of Cocaine Base and Cocaine)

6. On or about July 18, 2011, in the District of Connecticut, the defendant, JOHNNY SERRANO, a.k.a. "BEY BEY," and another individual unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base and a mixture and substance containing a detectable amount of cocaine, Schedule II controlled substances.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

(Possession with Intent to Distribute and Distribution of Cocaine Base and Cocaine)

7. On or about July 23, 2011, in the District of Connecticut, the defendants, JOHNNY SERRANO, a.k.a. "BEY BEY," and ALEXANDER ALVARADO, a.k.a. "ALEX," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base and a mixture and substance containing a detectable amount of cocaine, Schedule II controlled substances.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SIX

(Possession with Intent to Distribute and Distribution of Cocaine Base and Cocaine)

8. On or about July 26, 2011, in the District of Connecticut, the defendant, JOHNNY SERRANO, a.k.a. "BEY BEY," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base and a mixture and substance containing a detectable amount of cocaine, Schedule II controlled substances.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVEN

(Possession with Intent to Distribute and Distribution of Cocaine Base)

9. On or about July 30, 2011, in the District of Connecticut, the defendants, JOHNNY SERRANO, a.k.a. "BEY BEY," and JAVIER SERRANO, a.k.a. "JAVI," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT EIGHT

(Possession with Intent to Distribute and Distribution of Cocaine Base)

10. On or about August 15, 2011, in the District of Connecticut, the defendant, JOHNNY SERRANO, a.k.a. "BEY BEY," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance. In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINE

(Possession with Intent to Distribute and Distribution of Cocaine Base)

11. On or about August 25, 2011, in the District of Connecticut, the defendant, JOHNNY SERRANO, a.k.a. "BEY BEY," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance. In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TEN

(Possession with Intent to Distribute and Distribution of Cocaine Base)

12. On or about August 26, 2011, in the District of Connecticut, the defendant, JOHNNY SERRANO, a.k.a. "BEY BEY," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance. In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT ELEVEN

(Possession with Intent to Distribute and Distribution of Cocaine Base)

13. On or about September 1, 2011, in the District of Connecticut, the defendant, EMMANUEL ORTIZ, a.k.a. "EMMA," and another individual unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWELVE

(Possession with Intent to Distribute and Distribution of Cocaine Base)

14. On or about September 2, 2011, in the District of Connecticut, the defendant, MIGUEL TORRES, a.k.a. "CHUCKY," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTEEN

(Possession with Intent to Distribute and Distribution of Cocaine)

15. On or about September 2, 2011, in the District of Connecticut, the defendant, LUIS ORTIZ, a.k.a. "BIG NOSE," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOURTEEN

(Possession with Intent to Distribute and Distribution of Cocaine Base)

16. On or about September 6, 2011, in the District of Connecticut, the defendant, JOHNNY SERRANO, a.k.a. "BEY BEY," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIFTEEN

(Possession with Intent to Distribute and Distribution of Cocaine Base)

17. On or about September 7, 2011, in the District of Connecticut, the defendant, JOHNNY SERRANO, a.k.a. "BEY BEY," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIXTEEN

(Possession with Intent to Distribute and Distribution of Cocaine Base)

18. On or about September 10, 2011, in the District of Connecticut, the defendant, JOHNNY SERRANO, a.k.a. "BEY BEY," did knowingly and

intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVENTEEN

(Possession with Intent to Distribute and Distribution of Cocaine Base)

19. On or about September 15, 2011, in the District of Connecticut, the defendant, ALEXANDER ALVARADO, a.k.a. "ALEX," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHTEEN

(Possession with Intent to Distribute and Distribution of Cocaine Base)

20. On or about September 19, 2011, in the District of Connecticut, the defendant, ALEXANDER ALVARADO, a.k.a. "ALEX," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINETEEN

(Possession with Intent to Distribute and Distribution of Cocaine Base)

21. On or about October 25, 2011, in the District of Connecticut, the defendant, ALEXANDER ALVARADO, a.k.a. "ALEX," did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine base, a substance Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY

(Possession with Intent to Distribute Cocaine Base and Cocaine)

22. On or about November 4, 2011, in the District of Connecticut, the defendant, RICARDO AQUINO, a.k.a. "RICKY," did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base and a mixture and substance containing a detectable amount of cocaine, Schedule II controlled substances.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-ONE

(Possession with Intent to Distribute Cocaine)

23. On or about November 4, 2011, in the District of Connecticut, the defendant, RICARDO AQUINO, a.k.a. "RICKY," did knowingly and intentionally

possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C)

FORFEITURE ALLEGATION
(Controlled Substance Offenses)

24. Upon conviction of one or more of the controlled substance offenses alleged in Counts One through Twenty-One of this Indictment, the defendants, JOHNNY SERRANO, a.k.a. "BEY BEY"; ALEXANDER ALVARADO, a.k.a. "ALEX"; RICARDO AQUINO, a.k.a. "RICKY"; MARK FORMICA, a.k.a. "MIKE"; EMMANUEL ORTIZ, a.k.a. "EMMA"; JOSE LUIS ORTIZ, a.k.a. "TONY"; LUIS ORTIZ, a.k.a. "BIG NOSE"; JAVIER SERRANO, a.k.a. "JAVI"; JOSE SERRANO, a.k.a. "JOSE"; RAYMOND SERRANO, a.k.a. "MACHO"; and MIGUEL TORRES, a.k.a. "CHUCKY," shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, all right, title, and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violations of Title 21, United States Code, Sections 841 and 846, 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 and a sum of money equal to the total amount of proceeds obtained as a result of the offenses, including, but not limited to, the following:

- A red 1991 Honda Civic, bearing Connecticut registration 969YVB, with Vehicle Identification Number 2HGED6457MH573872, registered to JOSE L. ORTIZ at 453 Quinnipiac Avenue, New Haven, Connecticut; and

- A blue 1998 Jeep Wrangler, bearing Connecticut registration 187Y TZ, with Vehicle Identification Number 1J4FY29PXWP701346, registered to Elimayrie Serrano at 204 Hamilton Street, New Haven, Connecticut.

25. If any of the above-described forfeitable property, as a result of any act or omission of the defendants, 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 that cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

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

A TRUE BILL

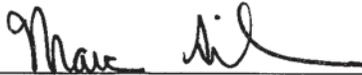
/s/

FOREPERSON

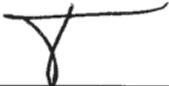
UNITED STATES OF AMERICA



DAVID B. FEIN
UNITED STATES ATTORNEY



MARC H. SILVERMAN
ASSISTANT UNITED STATES ATTORNEY



ANTHONY E. KAPLAN
ASSISTANT UNITED STATES ATTORNEY