

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

UNITED STATES OF AMERICA,
Plaintiff,

v.

- [1] JOSE D. CARDONA-VICENTY,
a.k.a. "David El Negro," "David El Prieto,"
(Counts 1 through 6)
[2] SONNY CARDONA-VICENTY,
a.k.a. "Sonny,"
(Counts 1 through 6)
[3] ALEX N. MORALES-VELEZ,
a.k.a. "Chapu,"
(Counts 1 through 6)
[4] KELLY RAMOS-SANTOS,
(Counts 1 through 6)
[5] ALBERTO L. AVELLANET-ECHEVARRIA,
a.k.a. "Mundi,"
(Counts 1 through 6)
[6] VICTOR VALENTIN-MANTILLA,
a.k.a. "Jordan," "Nino,"
(Counts 1 through 6)
[7] REINALDO-VALENTIN-RIVERA,
a.k.a. "Gordo,"
(Counts 1 through 6)
[8] BRYAN SEGARRA,
(Counts 1 through 6)
[9] KENNETH MATOS-MONTAS,
(Counts 1 through 6)
[10] STEPHEN SAN ANTONIO MEDINA,
a.k.a. "Stevie," "Steve,"
(Counts 1 through 6)
[11] REYSEL QUINTANA-PADILLA,
(Counts 1 through 6)
[12] HECTOR GUERRERO-FELICIANO,
a.k.a. "Chiqui,"
(Counts 1 through 6)
[13] ISRAEL CRUZ-RIOS,
a.k.a "Runy,"

INDICTMENT

Criminal No. 14 - 284 (JAF)

Violations:

- 21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
18 U.S.C. § 924(c)(1)(A)

(SIX COUNTS)

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(Counts 1 through 6)

[14] CHRISTIAN RODRIGUEZ-IRRIZARY,

(Counts 1 through 6)

[15] PABLO MENDEZ-SANTOS,

a.k.a. "Pablito,"

(Counts 1 through 6)

[16] CHRISTIAN BONILLA-COLON,

(Counts 1 through 6)

[17] JOSE L. CUEVAS-SANTOS,

a.k.a "Duraquito,"

(Counts 1 through 6)

[18] JOSE O. RODRIGUEZ-MONTALVO,

a.k.a "Che," "Barbero,"

(Counts 1 through 6)

[19] JEAN CARLOS-RIVERA,

a.k.a "Paito,"

(Counts 1 through 6)

[20] JERRY MARRERO-RAMIREZ,

(Counts 1 through 6)

[21] CHRISTOPHER GONZALEZ-PABON,

a.k.a "Pipoca,"

(Counts 1 through 6)

[22] JEFFREY DELGADO-LOPEZ,

a.k.a "Jeffrey Menor,"

(Counts 1 through 6)

[23] JEAN C. JUSTINIANO-MENDEZ,

a.k.a. "Jean Carlos,"

(Counts 1 through 6)

[24] CARLOS VALENTIN-PRATTS,

(Counts 1 through 6)

[25] NORBERTO DIAZ-VALENTIN,

a.k.a. "La Pro,"

(Counts 1 through 6)

[26] LUIS GONZALEZ-AGUIDA,

(Counts 1 through 6)

[27] STEVEN RAMOS-CARABALLO,

(Counts 1 through 6)

[28] PABLO CORREA-FLORES,

a.k.a. "Pablo Panzon," "Pablito El Gordo,"

(Counts 1 through 5)

[29] EMANUEL RAMOS-RIVERA,

a.k.a "Tripi," "Tripita,"

(Counts 1 through 5)

[30] MIGUELITO BORRERO-CASTILLO,
(Counts 1 through 5)
[31] JEREMY COSTACAMPS-VEGA,
(Counts 1 through 5)
[32] ELVIN SOTO-AYALA,
a.k.a. "Tony Mango,"
(Counts 1 through 5)
[33] FRANKLIN FUSTER-NIEVES,
a.k.a. "Frankie,"
(Counts 1 through 5)
[34] OSCAR ROOS-AQUINO,
a.k.a "El Domi,"
(Counts 1 through 5)
[35] WILLIAM A. VELEZ-BRACERO,
(Counts 1 through 5)
[36] KAYSELINE MARTINEZ-RAMIREZ,
(Counts 1 through 5)
[37] JESUS SANTIAGO-ALMODOVAR,
a.k.a "Chucho,"
(Counts 1 through 5)
[38] EDGAR J. MENDEZ-COLON,
(Counts 1 through 5)
[39] KENNETH PONCE-NIEVES,
a.k.a "Sin Cuello,"
(Counts 1 through 5)
[40] ERNIE TORRES-FERNANDEZ,
(Counts 1 through 5)
[41] JOSE IBARRONDO-GOYCO,
a.k.a "Sapito,"
(Counts 1 through 5)
[42] AGUSTIN BAEZ-CRUZ,
a.k.a "Cocote,"
(Counts 1 through 5)
[43] RAYMOND SOJO-NIEVES,
a.k.a "Anel,"
(Counts 1 through 5)
[44] IRIS DIAZ-FIGUEROA,
a.k.a "La India,"
(Counts 1 through 5)
[45] RAMON SANTIAGO-SANDOVAL,
(Counts 1 through 5)

[46] FNU LNU,
a.k.a. "Juny El Gordo," "Junior,"



(Counts 1 through 5)

[47] MOISES ALFARO-TIRADO,

(Counts 1 through 5)

[48] YADIRA FELICIANO-ACOSTA,

a.k.a. "La Rubia,"

(Counts 1 through 5)

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Possess with Intent to Distribute Controlled Substances)

From in or about and between August 2010 through the return of the instant Indictment, both dates being approximate and inclusive, in the Municipality of Mayaguez, District of Puerto Rico, and within the jurisdiction of this Court,

[1] JOSE D. CARDONA-VICENTY, a.k.a. "David El Negro," "David El Prieto,"

[2] SONNY CARDONA-VICENTY, a.k.a. "Sonny,"

[3] ALEX N. MORALES-VELEZ, a.k.a. "Chapu,"

[4] KELLY RAMOS-SANTOS,

[5] ALBERTO L. AVELLANET-ECHEVARRIA, a.k.a. "Mundi,"

[6] VICTOR VALENTIN-MANTILLA, a.k.a. "Jordan," "Nino,"

[7] REINALDO-VALENTIN-RIVERA, a.k.a. "Gordo,"

[8] BRYAN SEGARRA,

[9] KENNETH MATOS-MONTAS,

[10] STEPHEN SAN ANTONIO MEDINA, a.k.a. "Stevie," "Steve,"

[11] REYSEL QUINTANA-PADILLA,

[12] HECTOR GUERRERO-FELICIANO, a.k.a. "Chiqui,"

[13] ISRAEL CRUZ-RIOS, a.k.a. "Runy,"

[14] CHRISTIAN RODRIGUEZ-IRRIZARY,

[15] PABLO MENDEZ-SANTOS, a.k.a. "Pablito,"

[16] CHRISTIAN BONILLA,

[17] JOSE L. CUEVAS-SANTOS, a.k.a. "Duraquito,"

[18] JOSE O. RODRIGUEZ-MONTALVO, a.k.a. "Che," "Barbero,"

- [19] JEAN CARLOS-RIVERA, a.k.a "Paito,"
- [20] JERRY MARRERO-RAMIREZ,
- [21] CHRISTOPHER GONZALEZ-PABON, a.k.a "Pipoca,"
- [22] JEFFREY DELGADO-LOPEZ, a.k.a "Jeffrey Menor,"
- [23] JEAN C. JUSTINIANO-MENDEZ, a.k.a. "Jean Carlos,"
- [24] CARLOS VALENTIN-PRATTS,
- [25] NORBERTO DIAZ-VALENTIN, a.k.a. "La Pro,"
- [26] LUIS GONZALEZ-AGUIDA,
- [27] STEVEN RAMOS-CARABALLO,
- [28] PABLO CORREA-FLORES, a.k.a. "Pablo Panzon," "Pablito El Gordo,"
- [29] EMANUEL RAMOS-RIVERA, a.k.a "Tripi," "Tripita,"
- [30] MIGUELITO BORRERO-CASTILLO,
- [31] JEREMY COSTACAMPS-VEGA,
- [32] ELVIN SOTO-AYALA, a.k.a. "Tony Mango,"
- [33] FRANKLIN FUSTER-NIEVES, a.k.a. "Frankie,"
- [34] OSCAR ROOS-AQUINO, a.k.a "El Domi,"
- [35] WILLIAM A. VELEZ-BRACERO,
- [36] KAYSELINE MARTINEZ-RAMIREZ,
- [37] JESUS SANTIAGO-ALMODOVAR, a.k.a "Chucho,"
- [38] EDGAR J. MENDEZ-COLON,
- [39] KENNETH PONCE-NIEVES, a.k.a "Sin Cuello,"
- [40] ERNIE TORRES-FERNANDEZ,
- [41] JOSE IBARRONDO-GOYCO, a.k.a "Sapito,"
- [42] AGUSTIN BAEZ-CRUZ, a.k.a "Cocote,"
- [43] RAYMOND SOJO-NIEVES, a.k.a "Anel,"
- [44] IRIS DIAZ-FIGUEROA, a.k.a "La India,"
- [45] RAMON SANTIAGO-SANDOVAL,
- [46] FNU LNU, a.k.a "Juny El Gordo," "Junior,"
- [47] MOISES ALFARO-TIRADO,
- [48] YADIRA FELICIANO-ACOSTA, a.k.a. "La Rubia,"

the defendants herein, did knowingly and intentionally combine, confederate, and agree with each other and other persons, known and unknown, 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, five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, two hundred and eighty (280)

grams or more of a mixture or substance containing cocaine base (commonly known as “crack”), a Schedule II Narcotic Drug Controlled Substance, and one hundred (100) kilograms or more of 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 property comprising a housing facility owned by a public housing authority, that is, the Res. Rafael Hernandez (El Kennedy), Res. Manuel Hernandez Rosa (El Candelaria), and El Carmen Public Housing Projects, in violation of Title 21, United States Code, Sections 841(a)(1) and 860.

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

Object of the Conspiracy

The object of the conspiracy was to distribute controlled substances at the Res. Rafael Hernandez (El Kennedy), Res. Manuel Hernandez Rosa (El Candelaria), and El Carmen Public Housing Projects in Mayaguez, Puerto Rico, for significant financial gain and profit.

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 established drug distribution points inside the Res. Rafael Hernandez (El Kennedy), Res. Manuel Hernandez Rosa (El Candelaria), and El Carmen Public Housing Projects and would sell street quantity amounts of heroin, cocaine, cocaine base (“crack”), and marijuana at such drug point area.
2. 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, cocaine base

("crack"), and marijuana in order to distribute the same in street quantity amounts at the drug distribution points.

3. It was further part of the manner and means of the conspiracy that some of the co-conspirators would cut, divide and package heroin, cocaine, cocaine base ("crack"), and marijuana in small baggies, vials, or other packaging for subsequent sale at the drug distribution points.

4. It was further part of the manner and means of the conspiracy that drug point owners, runners, and sellers of this organization would divide among themselves and their subordinates the proceeds of the drug trafficking sales.

5. It was further part of the manner and means of the conspiracy that some of the co-conspirators would routinely place the controlled substances in distinctive colored baggies, vials, or other packaging in order to keep track, maintain and distinguish between the different types of controlled substances.

6. 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.

7. It was further part of the manner and means of the conspiracy that some of the co-conspirators would possess, carry, brandish and/or use firearms to protect themselves and their drug trafficking organization.

8. It was further part of the manner and means of the conspiracy that the co-conspirators would act in different roles in order to further the goals of the conspiracy, to wit: leaders, suppliers, runners, enforcers, sellers, facilitators, and look-outs.

9. It was a further part of the manner and means of the conspiracy that high level members of the drug trafficking organization or leaders would use monies derived from the sales of controlled substances to purchase firearms, ammunition, and bulletproof vests.

Roles of the Members of the Conspiracy

A. Leaders

Leaders controlled and supervised the drug trafficking operations at the drug distribution points. During the span of the conspiracy, leaders purchased kilogram quantities of narcotics and oversaw the sale of such narcotics at the drug distribution point. As leaders, they would receive proceeds from the sale of controlled substances distributed at the various drug distribution points. They would routinely place their drugs in distinctive colored baggies, vials, or other packaging in order to keep track of their drugs being sold at the drug distribution points. The following co-conspirators acted as leaders in this organization

- [1] JOSE D. CARDONA-VICENTY, a.k.a. "David El Negro," "David El Prieto,"**
- [2] SONNY CARDONA-VICENTY, a.k.a. "Sonny,"**
- [3] ALEX N. MORALES-VELEZ, a.k.a. "Chapu,"**
- [4] KELLY RAMOS-SANTOS,**

B. Suppliers

The suppliers were co-conspirators that would supply kilogram quantities of narcotics to the leaders, runners, and/or sellers for further distribution at the drug point. The following co-conspirator acted as a supplier in this organization:

- [3] ALEX N. MORALES-VELEZ, a.k.a. "Chapu,"**
- [4] KELLY RAMOS-SANTOS**
- [5] ALBERTO L. AVELLANET-ECHEVARRIA, a.k.a. "Mundi,"**
- [6] VICTOR VALENTIN-MANTILLA, a.k.a. "Jordan," "Nino,"**

C. **Enforcers**

Enforcers would possess, carry, brandish, use and discharge firearms to protect the leaders and members of the drug trafficking organization, the narcotics, the proceeds derived from the sale of narcotics, and to further accomplish the goals of the conspiracy. Enforcers often acted upon instructions given by the leaders of the organization and would provide protection to the drug trafficking organization's drug distribution points. The following individuals acted as enforcers for the drug trafficking organization:

- [2] **SONNY CARDONA-VICENTY, a.k.a. "Sonny,"**
- [7] **REINALDO-VALENTIN-RIVERA, a.k.a. "Gordo,"**
- [8] **BRYAN SEGARRA,**
- [9] **KENNETH MATOS-MONTAS,**
- [10] **STEPHEN SAN ANTONIO MEDINA, a.k.a. "Stevie," "Steve,"**
- [11] **REYSEL QUINTANA-PADILLA,**
- [12] **HECTOR GUERRERO-FELICIANO, a.k.a. "Chiqui,"**
- [13] **ISRAEL CRUZ-RIOS, a.k.a "Runy,"**

D. **Runners**

The runners worked under the 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 prepare ledgers to maintain accountability of the sales of the narcotics sold at the drug point. The runners would also supervise the sellers and the daily activities at the drug point.

The following co-conspirators acted as runners for the drug trafficking organization:

- [7] **REINALDO-VALENTIN-RIVERA, a.k.a. "Gordo,"**
- [13] **ISRAEL CRUZ-RIOS, a.k.a "Runy,"**
- [14] **CHRISTIAN RODRIGUEZ-IRRIZARY,**

E. Sellers

The sellers would distribute street quantity amounts of heroin, cocaine, crack, and marijuana. They would also be held accountable to leaders and/or runners for the drug proceeds and the narcotics sold at the drug distribution points.

The following acted as drug sellers for the above described drug trafficking organization:

- [6] VICTOR VALENTIN-MANTILLA, a.k.a. "Jordan," "Nino,"
- [7] REINALDO-VALENTIN-RIVERA, a.k.a. "Gordo,"
- [8] BRYAN SEGARRA,
- [9] KENNETH MATOS-MONTAS,
- [11] REYSEL QUINTANA-PADILLA,
- [12] HECTOR GUERRERO-FELICIANO, a.k.a. "Chiqui,"
- [13] ISRAEL CRUZ-RIOS, a.k.a "Runy,"
- [15] PABLO MENDEZ-SANTOS, a.k.a. "Pablito,"
- [16] CHRISTIAN BONILLA,
- [17] JOSE L. CUEVAS-SANTOS, a.k.a "Duraquito,"
- [18] JOSE O. RODRIGUEZ-MONTALVO, a.k.a "Che," "Barbero,"
- [19] JEAN CARLOS-RIVERA, a.k.a "Paito,"
- [20] JERRY MARRERO-RAMIREZ,
- [21] CHRISTOPHER GONZALEZ-PABON, a.k.a "Pipoca,"
- [22] JEFFREY DELGADO-LOPEZ, a.k.a "Jeffrey Menor,"
- [23] JEAN C. JUSTINIANO-MENDEZ, a.k.a. "Jean Carlos,"
- [24] CARLOS VALENTIN-PRATTS,
- [25] NORBERTO DIAZ-VALENTIN, a.k.a. "La Pro,"
- [26] LUIS GONZALEZ-AGUIDA,
- [27] STEVEN RAMOS-CARABALLO,
- [28] PABLO CORREA-FLORES, a.k.a. "Pablo Panzon," "Pablito El Gordo,"
- [29] EMANUEL RAMOS-RIVERA, a.k.a "Tripi," "Tripita,"
- [30] MIGUELITO BORRERO-CASTILLO,
- [31] JEREMY COSTACAMPS-VEGA,
- [32] ELVIN SOTO-AYALA, a.k.a. "Tony Mango,"
- [33] FRANKLIN FUSTER-NIEVES, a.k.a. "Frankie,"
- [34] OSCAR ROOS-AQUINO, a.k.a "El Domi,"
- [35] WILLIAM A. VELEZ-BRACERO,
- [36] KAYSELINE MARTINEZ-RAMIREZ,
- [37] JESUS SANTIAGO-ALMODOVAR, a.k.a "Chucho,"
- [38] EDGAR J. MENDEZ-COLON,
- [39] KENNETH PONCE-NIEVES, a.k.a "Sin Cuello,"
- [40] ERNIE TORRES-FERNANDEZ,

- [41] JOSE IBARRONDO-GOYCO, a.k.a “Sapito,”
- [42] AGUSTIN BAEZ-CRUZ, a.k.a “Cocote,”
- [43] RAYMOND SOJO-NIEVES, a.k.a “Anel,”
- [44] IRIS DIAZ-FIGUEROA, a.k.a “La India,”
- [45] RAMON SANTIAGO-SANDOVAL,
- [46] FNU LNU, a.k.a “Juny El Gordo,” “Junior,”
- [47] MOISES ALFARO-TIRADO,

F. **Facilitators**

Facilitators would often allow the use of their apartments in the public housing project in order to process, store, and package narcotics for distribution. Some would use their apartments within the public housing project as drug distribution points.

The following co-conspirators acted as facilitators within the conspiracy:

- [48] YADIRA FELICIANO-ACOSTA, a.k.a. “La Rubia,”

COUNT TWO
(Possession with Intent to Distribute Heroin)

From in or about and between August 2010 through the return of the instant Indictment, both dates being approximate and inclusive, in the Municipality of Mayaguez, District of Puerto Rico, and within the jurisdiction of this Court,

- [1] JOSE D. CARDONA-VICENTY, a.k.a. “David El Negro,” “David El Prieto,”
- [2] SONNY CARDONA-VICENTY, a.k.a. “Sonny,”
- [3] ALEX N. MORALES-VELEZ, a.k.a. “Chapu,”
- [4] KELLY RAMOS-SANTOS,
- [5] ALBERTO L. AVELLANET-ECHEVARRIA, a.k.a. “Mundi,”
- [6] VICTOR VALENTIN-MANTILLA, a.k.a. “Jordan,” “Nino,”
- [7] REINALDO-VALENTIN-RIVERA, a.k.a. “Gordo,”
- [8] BRYAN SEGARRA,
- [9] KENNETH MATOS-MONTAS,
- [10] STEPHEN SAN ANTONIO MEDINA, a.k.a. “Stevie,” “Steve,”
- [11] REYSEL QUINTANA-PADILLA,
- [12] HECTOR GUERRERO-FELICIANO, a.k.a. “Chiqui,”
- [13] ISRAEL CRUZ-RIOS, a.k.a “Runy,”
- [14] CHRISTIAN RODRIGUEZ-IRRIZARY,

- [15] PABLO MENDEZ-SANTOS, a.k.a. "Pablito,"
- [16] CHRISTIAN BONILLA,
- [17] JOSE L. CUEVAS-SANTOS, a.k.a "Duraquito,"
- [18] JOSE O. RODRIGUEZ-MONTALVO, a.k.a "Che," "Barbero,"
- [19] JEAN CARLOS-RIVERA, a.k.a "Paito,"
- [20] JERRY MARRERO-RAMIREZ,
- [21] CHRISTOPHER GONZALEZ-PABON, a.k.a "Pipoca,"
- [22] JEFFREY DELGADO-LOPEZ, a.k.a "Jeffrey Menor,"
- [23] JEAN C. JUSTINIANO-MENDEZ, a.k.a. "Jean Carlos,"
- [24] CARLOS VALENTIN-PRATTS,
- [25] NORBERTO DIAZ-VALENTIN, a.k.a. "La Pro,"
- [26] LUIS GONZALEZ-AGUIDA,
- [27] STEVEN RAMOS-CARABALLO,
- [28] PABLO CORREA-FLORES, a.k.a. "Pablo Panzon," "Pablito El Gordo,"
- [29] EMANUEL RAMOS-RIVERA, a.k.a "Tripi," "Tripita,"
- [30] MIGUELITO BORRERO-CASTILLO,
- [31] JEREMY COSTACAMPS-VEGA,
- [32] ELVIN SOTO-AYALA, a.k.a. "Tony Mango,"
- [33] FRANKLIN FUSTER-NIEVES, a.k.a. "Frankie,"
- [34] OSCAR ROOS-AQUINO, a.k.a "El Domi,"
- [35] WILLIAM A. VELEZ-BRACERO,
- [36] KAYSELINE MARTINEZ-RAMIREZ,
- [37] JESUS SANTIAGO-ALMODOVAR, a.k.a "Chucho,"
- [38] EDGAR J. MENDEZ-COLON,
- [39] KENNETH PONCE-NIEVES, a.k.a "Sin Cuello,"
- [40] ERNIE TORRES-FERNANDEZ,
- [41] JOSE IBARRONDO-GOYCO, a.k.a "Sapito,"
- [42] AGUSTIN BAEZ-CRUZ, a.k.a "Cocote,"
- [43] RAYMOND SOJO-NIEVES, a.k.a "Anel,"
- [44] IRIS DIAZ-FIGUEROA, a.k.a "La India,"
- [45] RAMON SANTIAGO-SANDOVAL,
- [46] FNU LNU, a.k.a "Juny El Gordo," "Junior,"
- [47] MOISES ALFARO-TIRADO,
- [48] YADIRA FELICIANO-ACOSTA, a.k.a. "La Rubia,"

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 housing facility owned by a public

housing authority, that is, the Res. Rafael Hernandez (El Kennedy), Res. Manuel Hernandez Rosa (El Candelaria), and El Carmen Public Housing Projects.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 860, and Title 18, United States Code, Section 2.

COUNT THREE
(Possession with Intent to Distribute Cocaine)

From in or about and between August 2010 through the return of the instant Indictment, both dates being approximate and inclusive, in the Municipality of Mayaguez, District of Puerto Rico, and within the jurisdiction of this Court,

- [1] JOSE D. CARDONA-VICENTY, a.k.a. "David El Negro," "David El Prieto,"
- [2] SONNY CARDONA-VICENTY, a.k.a. "Sonny,"
- [3] ALEX N. MORALES-VELEZ, a.k.a. "Chapu,"
- [4] KELLY RAMOS-SANTOS,
- [5] ALBERTO L. AVELLANET-ECHEVARRIA, a.k.a. "Mundi,"
- [6] VICTOR VALENTIN-MANTILLA, a.k.a. "Jordan," "Nino,"
- [7] REINALDO-VALENTIN-RIVERA, a.k.a. "Gordo,"
- [8] BRYAN SEGARRA,
- [9] KENNETH MATOS-MONTAS,
- [10] STEPHEN SAN ANTONIO MEDINA, a.k.a. "Stevie," "Steve,"
- [11] REYSEL QUINTANA-PADILLA,
- [12] HECTOR GUERRERO-FELICIANO, a.k.a. "Chiqui,"
- [13] ISRAEL CRUZ-RIOS, a.k.a. "Runy,"
- [14] CHRISTIAN RODRIGUEZ-IRRIZARY,
- [15] PABLO MENDEZ-SANTOS, a.k.a. "Pablito,"
- [16] CHRISTIAN BONILLA,
- [17] JOSE L. CUEVAS-SANTOS, a.k.a. "Duraquito,"
- [18] JOSE O. RODRIGUEZ-MONTALVO, a.k.a. "Che," "Barbero,"
- [19] JEAN CARLOS-RIVERA, a.k.a. "Paito,"
- [20] JERRY MARRERO-RAMIREZ,
- [21] CHRISTOPHER GONZALEZ-PABON, a.k.a. "Pipoca,"
- [22] JEFFREY DELGADO-LOPEZ, a.k.a. "Jeffrey Menor,"
- [23] JEAN C. JUSTINIANO-MENDEZ, a.k.a. "Jean Carlos,"
- [24] CARLOS VALENTIN-PRATTS,
- [25] NORBERTO DIAZ-VALENTIN, a.k.a. "La Pro,"
- [26] LUIS GONZALEZ-AGUIDA,

- [27] STEVEN RAMOS-CARABALLO,
- [28] PABLO CORREA-FLORES, a.k.a. "Pablo Panzon," "Pablito El Gordo,"
- [29] EMANUEL RAMOS-RIVERA, a.k.a "Tripi," "Tripita,"
- [30] MIGUELITO BORRERO-CASTILLO,
- [31] JEREMY COSTACAMPS-VEGA,
- [32] ELVIN SOTO-AYALA, a.k.a. "Tony Mango,"
- [33] FRANKLIN FUSTER-NIEVES, a.k.a. "Frankie,"
- [34] OSCAR ROOS-AQUINO, a.k.a "El Domi,"
- [35] WILLIAM A. VELEZ-BRACERO,
- [36] KAYSELINE MARTINEZ-RAMIREZ,
- [37] JESUS SANTIAGO-ALMODOVAR, a.k.a "Chucho,"
- [38] EDGAR J. MENDEZ-COLON,
- [39] KENNETH PONCE-NIEVES, a.k.a "Sin Cuello,"
- [40] ERNIE TORRES-FERNANDEZ,
- [41] JOSE IBARRONDO-GOYCO, a.k.a "Sapito,"
- [42] AGUSTIN BAEZ-CRUZ, a.k.a "Cocote,"
- [43] RAYMOND SOJO-NIEVES, a.k.a "Anel,"
- [44] IRIS DIAZ-FIGUEROA, a.k.a "La India,"
- [45] RAMON SANTIAGO-SANDOVAL,
- [46] FNU LNU, a.k.a "Juny El Gordo," "Junior,"
- [47] MOISES ALFARO-TIRADO,
- [48] YADIRA FELICIANO-ACOSTA, a.k.a. "La Rubia,"

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 housing facility owned by a public housing authority, that is, the Res. Rafael Hernandez (El Kennedy), Res. Manuel Hernandez Rosa (El Candelaria), and El Carmen Public Housing Projects.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 860, and Title 18, United States Code, Section 2.

COUNT FOUR
(Possession with Intent to Distribute Crack)

From in or about and between August 2010 through the return of the instant Indictment, both dates being approximate and inclusive, in the Municipality of Mayaguez, District of Puerto Rico, and within the jurisdiction of this Court,

- [1] JOSE D. CARDONA-VICENTY, a.k.a. "David El Negro," "David El Prieto,"
- [2] SONNY CARDONA-VICENTY, a.k.a. "Sonny,"
- [3] ALEX N. MORALES-VELEZ, a.k.a. "Chapu,"
- [4] KELLY RAMOS-SANTOS,
- [5] ALBERTO L. AVELLANET-ECHEVARRIA, a.k.a. "Mundi,"
- [6] VICTOR VALENTIN-MANTILLA, a.k.a. "Jordan," "Nino,"
- [7] REINALDO-VALENTIN-RIVERA, a.k.a. "Gordo,"
- [8] BRYAN SEGARRA,
- [9] KENNETH MATOS-MONTAS,
- [10] STEPHEN SAN ANTONIO MEDINA, a.k.a. "Stevie," "Steve,"
- [11] REYSEL QUINTANA-PADILLA,
- [12] HECTOR GUERRERO-FELICIANO, a.k.a. "Chiqui,"
- [13] ISRAEL CRUZ-RIOS, a.k.a "Runy,"
- [14] CHRISTIAN RODRIGUEZ-IRRIZARY,
- [15] PABLO MENDEZ-SANTOS, a.k.a. "Pablito,"
- [16] CHRISTIAN BONILLA,
- [17] JOSE L. CUEVAS-SANTOS, a.k.a "Duraquito,"
- [18] JOSE O. RODRIGUEZ-MONTALVO, a.k.a "Che," "Barbero,"
- [19] JEAN CARLOS-RIVERA, a.k.a "Paito,"
- [20] JERRY MARRERO-RAMIREZ,
- [21] CHRISTOPHER GONZALEZ-PABON, a.k.a "Pipoca,"
- [22] JEFFREY DELGADO-LOPEZ, a.k.a "Jeffrey Menor,"
- [23] JEAN C. JUSTINIANO-MENDEZ, a.k.a. "Jean Carlos,"
- [24] CARLOS VALENTIN-PRATTS,
- [25] NORBERTO DIAZ-VALENTIN, a.k.a. "La Pro,"
- [26] LUIS GONZALEZ-AGUIDA,
- [27] STEVEN RAMOS-CARABALLO,
- [28] PABLO CORREA-FLORES, a.k.a. "Pablo Panzon," "Pablito El Gordo,"
- [29] EMANUEL RAMOS-RIVERA, a.k.a "Tripi," "Tripita,"
- [30] MIGUELITO BORRERO-CASTILLO,
- [31] JEREMY COSTACAMPS-VEGA,
- [32] ELVIN SOTO-AYALA, a.k.a. "Tony Mango,"
- [33] FRANKLIN FUSTER-NIEVES, a.k.a. "Frankie,"
- [34] OSCAR ROOS-AQUINO, a.k.a "El Domi,"

- [35] WILLIAM A. VELEZ-BRACERO,
- [36] KAYSELINE MARTINEZ-RAMIREZ,
- [37] JESUS SANTIAGO-ALMODOVAR, a.k.a "Chucho,"
- [38] EDGAR J. MENDEZ-COLON,
- [39] KENNETH PONCE-NIEVES, a.k.a "Sin Cuello,"
- [40] ERNIE TORRES-FERNANDEZ,
- [41] JOSE IBARRONDO-GOYCO, a.k.a "Sapito,"
- [42] AGUSTIN BAEZ-CRUZ, a.k.a "Cocote,"
- [43] RAYMOND SOJO-NIEVES, a.k.a "Anel,"
- [44] IRIS DIAZ-FIGUEROA, a.k.a "La India,"
- [45] RAMON SANTIAGO-SANDOVAL,
- [46] FNU LNU, a.k.a "Juny El Gordo," "Junior,"
- [47] MOISES ALFARO-TIRADO,
- [48] YADIRA FELICIANO-ACOSTA, a.k.a. "La Rubia,"

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 cocaine base (commonly known as "crack"), a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of the real property comprising a housing facility owned by a public housing authority, that is, the Res. Rafael Hernandez (El Kennedy), Res. Manuel Hernandez Rosa (El Candelaria), and El Carmen Public Housing Projects.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 860, and Title 18, United States Code, Section 2.

COUNT FIVE
(Possession with Intent to Distribute Marijuana)

From in or about and between August 2010 through the return of the instant Indictment, both dates being approximate and inclusive, in the Municipality of Mayaguez, District of Puerto Rico, and within the jurisdiction of this Court,

- [1] JOSE D. CARDONA-VICENTY, a.k.a. "David El Negro," "David El Prieto,"
- [2] SONNY CARDONA-VICENTY, a.k.a. "Sonny,"
- [3] ALEX N. MORALES-VELEZ, a.k.a. "Chapu,"
- [4] KELLY RAMOS-SANTOS,
- [5] ALBERTO L. AVELLANET-ECHEVARRIA, a.k.a. "Mundi,"
- [6] VICTOR VALENTIN-MANTILLA, a.k.a. "Jordan," "Nino,"
- [7] REINALDO-VALENTIN-RIVERA, a.k.a. "Gordo,"
- [8] BRYAN SEGARRA,
- [9] KENNETH MATOS-MONTAS,
- [10] STEPHEN SAN ANTONIO MEDINA, a.k.a. "Stevie," "Steve,"
- [11] REYSEL QUINTANA-PADILLA,
- [12] HECTOR GUERRERO-FELICIANO, a.k.a. "Chiqui,"
- [13] ISRAEL CRUZ-RIOS, a.k.a "Runy,"
- [14] CHRISTIAN RODRIGUEZ-IRRIZARY,
- [15] PABLO MENDEZ-SANTOS, a.k.a. "Pablito,"
- [16] CHRISTIAN BONILLA,
- [17] JOSE L. CUEVAS-SANTOS, a.k.a "Duraquito,"
- [18] JOSE O. RODRIGUEZ-MONTALVO, a.k.a "Che," "Barbero,"
- [19] JEAN CARLOS-RIVERA, a.k.a "Paito,"
- [20] JERRY MARRERO-RAMIREZ,
- [21] CHRISTOPHER GONZALEZ-PABON, a.k.a "Pipoca,"
- [22] JEFFREY DELGADO-LOPEZ, a.k.a "Jeffrey Menor,"
- [23] JEAN C. JUSTINIANO-MENDEZ, a.k.a. "Jean Carlos,"
- [24] CARLOS VALENTIN-PRATTS,
- [25] NORBERTO DIAZ-VALENTIN, a.k.a. "La Pro,"
- [26] LUIS GONZALEZ-AGUIDA,
- [27] STEVEN RAMOS-CARABALLO,
- [28] PABLO CORREA-FLORES, a.k.a. "Pablo Panzon," "Pablito El Gordo,"
- [29] EMANUEL RAMOS-RIVERA, a.k.a "Tripi," "Tripita,"
- [30] MIGUELITO BORRERO-CASTILLO,
- [31] JEREMY COSTACAMPS-VEGA,
- [32] ELVIN SOTO-AYALA, a.k.a. "Tony Mango,"
- [33] FRANKLIN FUSTER-NIEVES, a.k.a. "Frankie,"
- [34] OSCAR ROOS-AQUINO, a.k.a "El Domi,"

- [35] WILLIAM A. VELEZ-BRACERO,
- [36] KAYSELINE MARTINEZ-RAMIREZ,
- [37] JESUS SANTIAGO-ALMODOVAR, a.k.a "Chucho,"
- [38] EDGAR J. MENDEZ-COLON,
- [39] KENNETH PONCE-NIEVES, a.k.a "Sin Cuello,"
- [40] ERNIE TORRES-FERNANDEZ,
- [41] JOSE IBARRONDO-GOYCO, a.k.a "Sapito,"
- [42] AGUSTIN BAEZ-CRUZ, a.k.a "Cocote,"
- [43] RAYMOND SOJO-NIEVES, a.k.a "Anel,"
- [44] IRIS DIAZ-FIGUEROA, a.k.a "La India,"
- [45] RAMON SANTIAGO-SANDOVAL,
- [46] FNU LNU, a.k.a "Juny El Gordo," "Junior,"
- [47] MOISES ALFARO-TIRADO,
- [48] YADIRA FELICIANO-ACOSTA, a.k.a. "La Rubia,"

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, within one thousand (1,000) feet of the real property comprising a housing facility owned by a public housing authority, that is, the Res. Rafael Hernandez (El Kennedy), Res. Manuel Hernandez Rosa (El Candelaria), and El Carmen Public Housing Projects.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 860, and Title 18, United States Code, Section 2.

COUNT SIX

(Use and Carry a Firearm During and in Relation to a Drug Trafficking Crime)

From in or about and between August 2010 through the return of the instant Indictment, both dates being approximate and inclusive, in the Municipality of Mayaguez, District of Puerto Rico, and within the jurisdiction of this Court,

- [1] JOSE D. CARDONA-VICENTY, a.k.a. "David El Negro," "David El Prieto,"
- [2] SONNY CARDONA-VICENTY, a.k.a. "Sonny,"
- [3] ALEX N. MORALES-VELEZ, a.k.a. "Chapu,"
- [4] KELLY RAMOS-SANTOS,
- [5] ALBERTO L. AVELLANET-ECHEVARRIA, a.k.a. "Mundi,"
- [6] VICTOR VALENTIN-MANTILLA, a.k.a. "Jordan," "Nino,"
- [7] REINALDO-VALENTIN-RIVERA, a.k.a. "Gordo,"
- [8] BRYAN SEGARRA,
- [9] KENNETH MATOS-MONTAS,
- [10] STEPHEN SAN ANTONIO MEDINA, a.k.a. "Stevie," "Steve,"
- [11] REYSEL QUINTANA-PADILLA,
- [12] HECTOR GUERRERO-FELICIANO, a.k.a. "Chiqui,"
- [13] ISRAEL CRUZ-RIOS, a.k.a "Runy,"
- [14] CHRISTIAN RODRIGUEZ-IRRIZARY,
- [15] PABLO MENDEZ-SANTOS, a.k.a. "Pablito,"
- [16] CHRISTIAN BONILLA,
- [17] JOSE L. CUEVAS-SANTOS, a.k.a "Duraquito,"
- [18] JOSE O. RODRIGUEZ-MONTALVO, a.k.a "Che," "Barbero,"
- [19] JEAN CARLOS-RIVERA, a.k.a "Paito,"
- [20] JERRY MARRERO-RAMIREZ,
- [21] CHRISTOPHER GONZALEZ-PABON, a.k.a "Pipoca,"
- [22] JEFFREY DELGADO-LOPEZ, a.k.a "Jeffrey Menor,"
- [23] JEAN C. JUSTINIANO-MENDEZ, a.k.a. "Jean Carlos,"
- [24] CARLOS VALENTIN-PRATTS,
- [25] NORBERTO DIAZ-VALENTIN, a.k.a. "La Pro,"
- [26] LUIS GONZALEZ-AGUIDA,
- [27] STEVEN RAMOS-CARABALLO,

the defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did knowingly use and carry a firearm, as defined in Title 18, United States Code, Section 921(a)(3), during and in relation to a drug trafficking crime, as that term is defined in

Title 18, United States Code, Section 924(c)(2), for which they may be prosecuted in a court of the United States, that is, a violation of Title 21, United States Code, Section 846, involving a conspiracy to possess with intent to distribute controlled substances, as charged in Count One of the Indictment, and Title 21, United States Code, Section 841(a)(1), involving possession with intent to distribute controlled substances, as charged in Counts Two through Five, which are realleged and incorporated by reference herein.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

NARCOTICS FORFEITURE ALLEGATIONS

The allegations contained in Counts One through Five of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853. Upon conviction of the offense in violation of Title 21, United States Code, Sections 846 and 841(a)(1), set forth in Counts One through Five of this Indictment, the defendants,

- [1] JOSE D. CARDONA-VICENTY, a.k.a. "David El Negro," "David El Prieto,"
- [2] SONNY CARDONA-VICENTY, a.k.a. "Sonny,"
- [3] ALEX N. MORALES-VELEZ, a.k.a. "Chapu,"
- [4] KELLY RAMOS-SANTOS,
- [5] ALBERTO L. AVELLANET-ECHEVARRIA, a.k.a. "Mundi,"
- [6] VICTOR VALENTIN-MANTILLA, a.k.a. "Jordan," "Nino,"
- [7] REINALDO-VALENTIN-RIVERA, a.k.a. "Gordo,"
- [8] BRYAN SEGARRA,
- [9] KENNETH MATOS-MONTAS,
- [10] STEPHEN SAN ANTONIO MEDINA, a.k.a. "Stevie," "Steve,"
- [11] REYSEL QUINTANA-PADILLA,
- [12] HECTOR GUERRERO-FELICIANO, a.k.a. "Chiqui,"
- [13] ISRAEL CRUZ-RIOS, a.k.a. "Runy,"
- [14] CHRISTIAN RODRIGUEZ-IRRIZARY,
- [15] PABLO MENDEZ-SANTOS, a.k.a. "Pablito,"
- [16] CHRISTIAN BONILLA,
- [17] JOSE L. CUEVAS-SANTOS, a.k.a. "Duraquito,"
- [18] JOSE O. RODRIGUEZ-MONTALVO, a.k.a. "Che," "Barbero,"
- [19] JEAN CARLOS-RIVERA, a.k.a. "Paito,"
- [20] JERRY MARRERO-RAMIREZ,
- [21] CHRISTOPHER GONZALEZ-PABON, a.k.a. "Pipoca,"
- [22] JEFFREY DELGADO-LOPEZ, a.k.a. "Jeffrey Menor,"
- [23] JEAN C. JUSTINIANO-MENDEZ, a.k.a. "Jean Carlos,"
- [24] CARLOS VALENTIN-PRATTS,
- [25] NORBERTO DIAZ-VALENTIN, a.k.a. "La Pro,"
- [26] LUIS GONZALEZ-AGUIDA,
- [27] STEVEN RAMOS-CARABALLO,
- [28] PABLO CORREA-FLORES, a.k.a. "Pablo Panzon," "Pablito El Gordo,"
- [29] EMANUEL RAMOS-RIVERA, a.k.a. "Tripi," "Tripita,"
- [30] MIGUELITO BORRERO-CASTILLO,
- [31] JEREMY COSTACAMPS-VEGA,

- [32] **ELVIN SOTO-AYALA, a.k.a. "Tony Mango,"**
- [33] **FRANKLIN FUSTER-NIEVES, a.k.a. "Frankie,"**
- [34] **OSCAR ROOS-AQUINO, a.k.a "El Domi,"**
- [35] **WILLIAM A. VELEZ-BRACERO,**
- [36] **KAYSELINE MARTINEZ-RAMIREZ,**
- [37] **JESUS SANTIAGO-ALMODOVAR, a.k.a "Chucho,"**
- [38] **EDGAR J. MENDEZ-COLON,**
- [39] **KENNETH PONCE-NIEVES, a.k.a "Sin Cuello,"**
- [40] **ERNIE TORRES-FERNANDEZ,**
- [41] **JOSE IBARRONDO-GOYCO, a.k.a "Sapito,"**
- [42] **AGUSTIN BAEZ-CRUZ, a.k.a "Cocote,"**
- [43] **RAYMOND SOJO-NIEVES, a.k.a "Anel,"**
- [44] **IRIS DIAZ-FIGUEROA, a.k.a "La India,"**
- [45] **RAMON SANTIAGO-SANDOVAL,**
- [46] **FNU LNU, a.k.a "Juny El Gordo," "Junior,"**
- [47] **MOISES ALFARO-TIRADO,**
- [48] **YADIRA FELICIANO-ACOSTA, a.k.a. "La Rubia,"**

shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations, including but not limited to the following: (a) all rights, titles, and interest in all property constituting, or derived from, any proceeds defendants obtained, directly or indirectly, as a result of each offense described in Counts One through Five of this Indictment and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation alleged in Counts One through Five of this Indictment; and (b) a sum of money in United States currency equal to the amount of proceeds obtained as a result of the offense described in Counts One through Five of this Indictment for which the defendants are jointly and severally liable.

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 28, United States Code, Section 2461(c).

All pursuant to Title 21, United States Code, Section 853.



FOREPERSON

DATE: *April 23, 2014.*

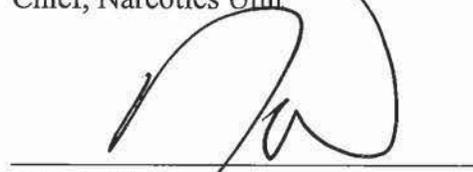
ROSA EMILIA RODRIGUEZ-VELEZ
UNITED STATES ATTORNEY



José A. Ruíz-Santiago
Assistant United States Attorney
Chief, Criminal Division



Jenifer V. Hernández
Assistant United States Attorney
Chief, Narcotics Unit



José A. Contreras
Assistant United States Attorney