

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

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U.S. DISTRICT COURT  
SAN JUAN, PR  
2014 MAY 20 PM 6:23  
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UNITED STATES OF AMERICA,  
Plaintiff,

v.

[1] INDALECIO ROSA-VAZQUEZ,

[2] JORGE RIVERA-OTERO,

[3] RONALD ROSA-RAMOS,

Defendants.

INDICTMENT

SEALED

CRIMINAL NO. 14- 361 (FAB)

Violations:

Title 21 United States Code, §§ 841, 846,  
863

Title 18, United States Code, § 2

Forfeiture:

Title 18, United States Code, § 853, 863

TEN COUNTS

THE GRAND JURY CHARGES:

COUNT ONE

**Conspiracy to Manufacture and Distribute Controlled Substances  
(Title 21, United States Code, §§ 846 and 841(a)(1) and (b)(1)(A)(i),(ii))**

From in or about September 2011, continuing through in or about mid February 2014, in  
the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

[1] INDALECIO ROSA-VAZQUEZ,

[2] JORGE RIVERA-OTERO,

[3] RONALD ROSA-RAMOS,

the defendants herein, did knowingly and intentionally combine, conspire, and agree with each  
other and others unknown to the Grand Jury to commit an offense against the United States, to wit:  
manufacture and distribute controlled substances, that is, five (5) kilograms or more of a mixture

or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance; and 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, §§ 846, 841(a)(1) and (b)(1)(A)(i),(ii).

**COUNT TWO**

**Attempt to Manufacture and Distribute a Controlled Substance  
Aiding and Abetting  
(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii) &  
Title 18, United States Code, § 2)**

On or about July 3, 2012, in Caguas within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] INDALECIO ROSA-VAZQUEZ,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute a controlled substance, that is, five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii), and Title 18, United States Code, § 2.

**COUNT THREE**

**Attempt to Manufacture and Distribute a Controlled Substance  
Aiding and Abetting  
(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii) &  
Title 18, United States Code, § 2)**

On or about February 5, 2014, in Caguas within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[2] JORGE RIVERA-OTERO,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute a controlled substance, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii), and Title 18, United States Code, § 2.

**COUNT FOUR**  
**Attempt to Manufacture and Distribute Controlled Substances**  
**Aiding and Abetting**  
**(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(i),(ii) &**  
**Title 18, United States Code, § 2)**

On or about September 14, 2011, in Caguas within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[3] RONALD ROSA-RAMOS,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute controlled substances, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II, Narcotic Drug Controlled Substance; and **one hundred (100) grams** 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, §§ 846, 841(a)(1) and (b)(1)(B)(i),(ii), and Title 18, United States Code, § 2.

**COUNT FIVE**  
**Attempt to Manufacture and Distribute Controlled Substances**  
**Aiding and Abetting**  
**(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(i),(ii) &**  
**Title 18, United States Code, § 2)**

On or about September 20, 2011, in Caguas within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[3] RONALD ROSA-RAMOS,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute controlled substances, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II, Narcotic Drug Controlled Substance; and **one hundred (100) grams** 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, §§ 846, 841(a)(1) and (b)(1)(B)(i),(ii), and Title 18, United States Code, § 2.

**COUNT SIX**  
**Conspiracy to Sell and Offer for Sale of Drug Paraphernalia**  
**(Title 21, United States Code, §§ 846 and 863(a)(1), (b), (d))**

From in or about September 2011, continuing through in or about mid February 2014, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] INDALECIO ROSA-VAZQUEZ,**

**[2] JORGE RIVERA-OTERO,**

**[3] RONALD ROSA-RAMOS,**

the defendants herein, did unlawfully combine, conspire, and agree with each other and others unknown to the Grand Jury to commit an offense against the United States, that is, sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, including cut materials [used to process illegal controlled substances such as cocaine and heroin, to wit: Lidocaine, Procaine, Quinine, Mannitol, Pro-Scent, Lactose, Caffeine, ComeBack, Juppa]; packaging material [to wit: glass vials and colored plastic caps). All in violation of Title 21, United States Code, §§ 846, 863(a)(1), (b),(d)).

**COUNT SEVEN**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about July 3, 2012, in Caguas within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] INDALECIO ROSA-VAZQUEZ,**

the defendant herein, aided and abetted by others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including Lidocaine, Lactose, Procaine, Pro-Scent, cut materials used to process

cocaine, an illegal controlled substance. All in violation of Title 21, United States Code, § 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**COUNT EIGHT**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about February 5, 2014, in Caguas within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[2] JORGE RIVERA-OTERO,**

the defendant herein, aided and abetted by others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including Lactose, Caffeine, and Pro-Scent, cut materials used to process cocaine, an illegal controlled substance. All in violation of Title 21, United States Code, § 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**COUNT NINE**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about September 14, 2011, in Caguas within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[3] RONALD ROSA-RAMOS,**

the defendant herein, aided and abetted by others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including ComeBack, cut material used to process cocaine base, an illegal controlled substance; Juppa, cut material used to process heroin; and approximately 3,000 glass vials. All in violation of Title 21, United States Code, § 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**COUNT TEN**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about September 20, 2011, in Caguas within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[3] RONALD ROSA-RAMOS,**

the defendant herein, aided and abetted by others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including Mannitol, cut material used to process heroin, an illegal controlled substance; ComeBack, cut material used to process cocaine base, an illegal controlled substance; and Procaine and Lactose, cut materials used to process cocaine, an illegal controlled substance. All in violation of Title 21, United States Code, §§ 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**NARCOTICS FORFEITURE ALLEGATION**

1. The allegations contained in Counts One through Ten of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, 841, or 863, the defendants,

**[1] INDALECIO ROSA-VAZQUEZ,**

**[2] JORGE RIVERA-OTERO,**

**[3] RONALD ROSA-RAMOS,**

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.

3. Any drug paraphernalia involved in any violation of Title 21, United States Code, Section 863, shall be subject to seizure and forfeiture upon the conviction of a person for such violation.

4. 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,

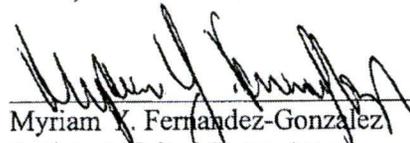
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

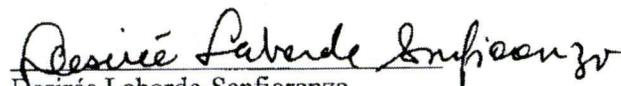
TRUE BILL  
FOREPERSON

DATE: *Mayo / 20 / 2014*

**ROSA EMILIA RODRIGUEZ-VELEZ**  
**UNITED STATES ATTORNEY**

  
\_\_\_\_\_  
José A. Ruiz-Santiago  
Assistant United States Attorney  
Chief, Criminal Division

  
\_\_\_\_\_  
Myriam X. Fernandez-Gonzalez  
Assistant United States Attorney  
Deputy Chief, Narcotics Unit

  
\_\_\_\_\_  
Desirée Laborde-Sanfiorenzo  
Assistant United States Attorney

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

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UNITED STATES OF AMERICA,  
Plaintiff,

v.

[1] JORGE GONZALEZ-FERNANDEZ,  
[2] TULIO FIGUEROA-SANTIAGO,  
[3] JOSE CUBILLETE-DIAZ,  
[4] SAUL FIGUEROA-ALVAREZ,  
[5] DENNIS OCASIO-OTERO,  
Defendants.

INDICTMENT

SEALED

CRIMINAL NO. 14- 360 (DRD)

Violations:

Title 21 United States Code, §§ 841, 846,  
863; 331, 352, 333

Title 18, United States Code, § 2

Forfeiture:

Title 18, United States Code, § 853, 863

THIRTY COUNTS

**THE GRAND JURY CHARGES:**

COUNT ONE

**Conspiracy to Manufacture and Distribute Controlled Substances**  
(Title 21, United States Code, §§ 846 and 841(a)(1) and (b)(1)(A)(i),(ii))

From in or about March 2011, continuing through in or about mid February 2014, in the  
District of Puerto Rico and elsewhere within the jurisdiction of this Court,

[1] JORGE GONZALEZ-FERNANDEZ,  
[2] TULIO FIGUEROA-SANTIAGO,  
[3] JOSE CUBILLETE-DIAZ,  
[4] SAUL FIGUEROA-ALVAREZ,  
[5] DENNIS OCASIO-OTERO,

the defendants herein, did knowingly and intentionally combine, conspire, and agree with each  
other and others unknown to the Grand Jury to commit an offense against the United States, to wit:  
manufacture and distribute controlled substances, that is, five (5) kilograms or more of a mixture  
or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled

Substance; and 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, §§ 846, 841(a)(1) and (b)(1)(A)(i),(ii).

**COUNT TWO**

**Attempt to Manufacture and Distribute Controlled Substances  
Aiding and Abetting  
(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(i),(ii) &  
Title 18, United States Code, § 2)**

On or about November 8, 2011, in Humacao within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] JORGE GONZALEZ-FERNANDEZ, and  
[4] SAUL FIGUEROA-ALVAREZ,**

the defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute controlled substances, that is, five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance; and 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, §§ 846, 841(a)(1) and (b)(1)(A)(i),(B)(ii), and Title 18, United States Code, § 2.

**COUNT THREE**

**Attempt to Manufacture and Distribute a Controlled Substance  
Aiding and Abetting  
(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(i) &  
Title 18, United States Code, § 2)**

On or about July 3, 2012, in Toa Baja within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] JORGE GONZALEZ-FERNANDEZ, and  
[2] TULIO FIGUEROA-SANTIAGO,**

the defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute a controlled substance, that is, **one hundred (100) grams** 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, §§ 846, 841(a)(1) and (b)(1)(B)(i), and Title 18, United States Code, § 2.

**COUNT FOUR**  
**Attempt to Manufacture and Distribute a Controlled Substance**  
**Aiding and Abetting**  
**(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii) &**  
**Title 18, United States Code, § 2)**

On or about April 27, 2011, in Manati within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] JORGE GONZALEZ-FERNANDEZ, and  
[5] DENNIS OCASIO-OTERO,**

the defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did knowingly and intentionally attempt to and manufacture and distribute a controlled substance, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii), and Title 18, United States Code, § 2.

**COUNT FIVE**  
**Attempt to Manufacture and Distribute a Controlled Substance**  
**Aiding and Abetting**  
**(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii) &**  
**Title 18, United States Code, § 2)**

On or about May 19, 2011, in Toa Baja within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[2] TULIO FIGUEROA-SANTIAGO,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute a controlled substance, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii), and Title 18, United States Code, § 2.

**COUNT SIX**  
**Attempt to Manufacture and Distribute a Controlled Substance**  
**Aiding and Abetting**  
**(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii) &**  
**Title 18, United States Code, § 2)**

On or about July 19, 2011, in Toa Baja within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[2] TULIO FIGUEROA-SANTIAGO,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute a controlled substance, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of

cocaine, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii), and Title 18, United States Code, § 2.

**COUNT SEVEN**

**Attempt to Manufacture and Distribute a Controlled Substance  
Aiding and Abetting  
(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii) &  
Title 18, United States Code, § 2)**

On or about April 26, 2011, in San Juan within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[3] JOSE CUBILLETE-DIAZ,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute a controlled substance, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii), and Title 18, United States Code, § 2.

**COUNT EIGHT**

**Attempt to Manufacture and Distribute a Controlled Substance  
Aiding and Abetting  
(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii) &  
Title 18, United States Code, § 2)**

On or about July 2, 2013, in San Juan within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[3] JOSE CUBILLETE-DIAZ,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute a controlled substance, that is,

**five hundred (500) grams** or more of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii), and Title 18, United States Code, § 2.

**COUNT NINE**

**Attempt to Manufacture and Distribute a Controlled Substance  
Aiding and Abetting  
(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii) &  
Title 18, United States Code, § 2)**

On or about July 21, 2011, in San Juan within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[3] JOSE CUBILLETE-DIAZ,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute a controlled substance, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii), and Title 18, United States Code, § 2.

**COUNT TEN**

**Attempt to Manufacture and Distribute a Controlled Substance  
Aiding and Abetting  
(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii) &  
Title 18, United States Code, § 2)**

On or about February 5, 2014, in San Juan within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[3] JOSE CUBILLETE-DIAZ,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute a controlled substance, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii), and Title 18, United States Code, § 2.

**COUNT ELEVEN**  
**Attempt to Manufacture and Distribute Controlled Substances**  
**Aiding and Abetting**  
**(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(i),(ii) &**  
**Title 18, United States Code, § 2)**

On or about September 20, 2011, in Humacao within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[4] SAUL FIGUEROA-ALVAREZ,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute controlled substances, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II, Narcotic Drug Controlled Substance; and **one hundred (100) grams** 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, §§ 846, 841(a)(1) and (b)(1)(B)(i),(ii), and Title 18, United States Code, § 2.

**COUNT TWELVE**  
**Attempt to Manufacture and Distribute Controlled Substances**  
**Aiding and Abetting**  
**(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii) &**  
**Title 18, United States Code, § 2)**

On or about October 20, 2011, in Humacao within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[4] SAUL FIGUEROA-ALVAREZ,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute controlled substances, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii), and Title 18, United States Code, § 2.

**COUNT THIRTEEN**  
**Attempt to Manufacture and Distribute Controlled Substances**  
**Aiding and Abetting**  
**(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii) &**  
**Title 18, United States Code, § 2)**

On or about November 2, 2011, in Humacao within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[4] SAUL FIGUEROA-ALVAREZ,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute controlled substances, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of

cocaine, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii), and Title 18, United States Code, § 2.

**COUNT FOURTEEN**

**Attempt to Manufacture and Distribute Controlled Substances  
Aiding and Abetting  
(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(i),(ii) &  
Title 18, United States Code, § 2)**

On or about August 30, 2011, in Manati within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[5] DENNIS OCASIO-OTERO,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute controlled substances, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance; and **one hundred (100) grams** 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, §§ 846, 841(a)(1) and (b)(1)(B)(i),(ii), and Title 18, United States Code, § 2.

**COUNT FIFTEEN**

**Attempt to Manufacture and Distribute Controlled Substances  
Aiding and Abetting  
(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii) &  
Title 18, United States Code, § 2)**

On or about April 27, 2011, in Manati within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[5] DENNIS OCASIO-OTERO,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute controlled substances, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii), and Title 18, United States Code, § 2.

**COUNT SIXTEEN**  
**Attempt to Manufacture and Distribute Controlled Substances**  
**Aiding and Abetting**  
**(Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii) &**  
**Title 18, United States Code, § 2)**

On or about June 2, 2011, in Manati within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[5] DENNIS OCASIO-OTERO,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to manufacture and distribute controlled substances, that is, **five hundred (500) grams** or more of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, §§ 846, 841(a)(1) and (b)(1)(B)(ii), and Title 18, United States Code, § 2.

**COUNT SEVENTEEN**  
**Conspiracy to Sell and Offer for Sale of Drug Paraphernalia**  
**(Title 21, United States Code, §§ 846 and 863(a)(1), (b), (d))**

From in or about March 2011, continuing through in or about mid February 2014, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

- [1] JORGE GONZALEZ-FERNANDEZ,
- [2] TULIO FIGUEROA-SANTIAGO,
- [3] JOSE CUBILLETE-DIAZ,
- [4] SAUL FIGUEROA-ALVAREZ,
- [5] DENNIS OCASIO-OTERO,

the defendants herein, did unlawfully combine, conspire, and agree with each other and others unknown to the Grand Jury to commit an offense against the United States, that is, sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including cut materials [used to process illegal controlled substances such as cocaine and heroin, to wit: Lidocaine, Quinine, Lactose, Caffeine, ComeBack, Juppa, Chocolate]; packaging material [to wit: plastic baggies, glass vials, and colored plastic caps); scales; and presses. All in violation of Title 21, United States Code, §§ 846, 863(a)(1), (b),(d).

**COUNT EIGHTEEN**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about November 8, 2011, in Humacao within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

[1] JORGE GONZALEZ-FERNANDEZ, and  
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**[4] SAUL FIGUEROA-ALVAREZ,**

the defendants herein, aiding and abetting each other and others known and unknown to the members of the Grand Jury, did unlawfully offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including Chocolate, a cut material used to process heroin, an illegal controlled substance. All in violation of Title 21, United States Code, §§ 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**COUNT NINETEEN**

**Sale and Offer For Sale of Drug Paraphernalia  
(Title 21, United States Code, § 863(a)(1), (b), (d) &  
Title 18, United States Code, § 2)**

On or about July 3, 2012, in Toa Baja within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] JORGE GONZALEZ-FERNANDEZ, and  
[2] TULIO FIGUEROA-SANTIAGO,**

the defendants herein, aiding and abetting each other and others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled

substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code including Chocolate, a cut material used to process heroin, an illegal controlled substance. All in violation of Title 21, United States Code, § 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**COUNT TWENTY**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about April 27, 2011, in Manati within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] JORGE GONZALEZ-FERNANDEZ, and**  
**[5] DENNIS OCASIO-OTERO,**

the defendants herein, aiding and abetting each other and others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, , possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including Lactose, Caffeine, and ComeBack, cut materials used to process cocaine, an illegal controlled substance; and approximately 3,000 miniature glass vials. All in violation of Title 21, United States Code, § 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**COUNT TWENTY-ONE**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about May 19, 2011, in Toa Baja within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[2] TULIO FIGUEROA-SANTIAGO,**

the defendant herein, aided and abetted by others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including Lactose and Caffeine, cut materials used to process cocaine, an illegal controlled substance; and approximately 3,000 glass vials. All in violation of Title 21, United States Code, § 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**COUNT TWENTY-TWO**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about April 26, 2011, in San Juan within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[3] JOSE CUBILLETE-DIAZ,**

the defendant herein, aided and abetted by others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including Lactose and Caffeine, cut materials used to process cocaine, an illegal controlled substance; and approximately 3,000 miniature glass vials. All in violation of Title 21, United States Code, § 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**COUNT TWENTY- THREE**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about July 21, 2011, in San Juan within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[3] JOSE CUBILLETE-DIAZ,**

the defendant herein, aided and abetted by others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled

substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including Lidocaine, Lactose, and Caffeine, cut materials used to process cocaine, an illegal controlled substance. All in violation of Title 21, United States Code, § 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**COUNT TWENTY-FOUR**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about July 2, 2013, in San Juan within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[3] JOSE CUBILLETE-DIAZ,**

the defendant herein, aided and abetted by others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including Lidocaine, Lactose, and Caffeine, cut materials used to process cocaine, an illegal controlled substance. All in violation of Title 21, United States Code, § 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**COUNT TWENTY-FIVE**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about February 5, 2014, in San Juan within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[3] JOSE CUBILLETE-DIAZ,**

the defendant herein, aided and abetted by others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including Lidocaine and Caffeine, cut materials used to process cocaine, an illegal controlled substance. All in violation of Title 21, United States Code, § 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**COUNT TWENTY-SIX**  
**Misbranding of Drugs with Intent to Mislead and Defraud**  
**(Title 21, United States Code, §§ 352(b) and 333(a)(2) &**  
**Title 18, United States Code, § 2)**

On or about July 2, 2013, in San Juan within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[3] JOSE CUBILETTE-DIAZ,**

the defendant herein, aided and abetted by others known and unknown to the Grand Jury, with

intent to defraud and mislead, did an act that caused a drug, that is, Lidocaine, to be misbranded under Title 21, United States Code, § 352(b) and (f) while such drug was held for sale after shipment in interstate commerce. All in violation of Title 21, United States Code, Sections 331(k), 352(b) and (f), and 333(a)(2).

**COUNT TWENTY-SEVEN**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about September 20, 2011, in Humacao within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[4] SAUL FIGUEROA-ALVAREZ,**

the defendant herein, aided and abetted by others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including Lactose, a cut material used to process cocaine, an illegal controlled substance; Juppa and Chocolate, cut materials used to process heroin, an illegal controlled substance; and approximately 3,000 miniature glass vials. All in violation of Title 21, United States Code, § 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**COUNT TWENTY-EIGHT**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about November 2, 2011, in Humacao within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[4] SAUL FIGUEROA-ALVAREZ,**

the defendant herein, aided and abetted by others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including Lactose, a cut material used to process cocaine. All in violation of Title 21, United States Code, § 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**COUNT TWENTY-NINE**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about June 2, 2011, in Manati within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[5] DENNIS OCASIO-OTERO,**

the defendant herein, aided and abetted by others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment,

product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including Lactose and Caffeine, cut materials used to process cocaine, an illegal controlled substance. All in violation of Title 21, United States Code, § 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

**COUNT THIRTY**  
**Sale and Offer For Sale of Drug Paraphernalia**  
**(Title 21, United States Code, § 863(a)(1), (b), (d) &**  
**Title 18, United States Code, § 2)**

On or about August 30, 2011, in Manati within the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[5] DENNIS OCASIO-OTERO,**

the defendant herein, aided and abetted by others known and unknown to the members of the Grand Jury, did unlawfully sell and offer for sale drug paraphernalia, that is, any equipment, product, and material of any kind which is primarily intended and designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, and otherwise introducing into the human body a controlled substance, possession of which is unlawful under Subchapter I of Chapter 13 of Title 21, United States Code, including Lactose, a cut material used to process cocaine, an illegal controlled substance; and ComeBack, a cut material used to process heroin, an illegal controlled substance.

All in violation of Title 21, United States Code, § 863(a)(1), (b), (d), and Title 18, United States Code, § 2.

### NARCOTICS FORFEITURE ALLEGATION

1. The allegations contained in Counts One through Twenty Six, and Twenty Eight through Thirty-One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, 841, or 863, the defendants,

[1] JORGE GONZALEZ-FERNANDEZ,

[2] TULIO FIGUEROA-SANTIAGO,

[3] JOSE CUBILLETE-DIAZ,

[4] SAUL FIGUEROA-ALVAREZ,

[5] DENNIS OCASIO-OTERO,

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.

3. Any drug paraphernalia involved in any violation of Title 21, United States Code, Section 863, shall be subject to seizure and forfeiture upon the conviction of a person for such violation.

4. 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,

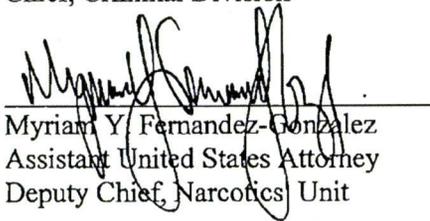
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

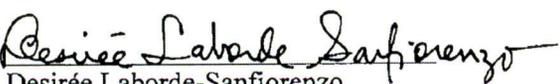
TRUE BILL  
FOREPERSON

DATE: *May 20/2014*

**ROSA EMILIA RODRIGUEZ-VELEZ**  
**UNITED STATES ATTORNEY**

  
\_\_\_\_\_  
José A. Ruiz-Santiago  
Assistant United States Attorney  
Chief, Criminal Division

  
\_\_\_\_\_  
Myriam Y. Fernandez-Gonzalez  
Assistant United States Attorney  
Deputy Chief, Narcotics Unit

  
\_\_\_\_\_  
Desirée Laborde-Sanfiorenzo  
Assistant United States Attorney