

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

UNITED STATES OF AMERICA,
Plaintiff,

v.

[1] JOSUE VAZQUEZ-CARRASQUILLO,
a/k/a "Mayito/Mayo/El Father",
(Counts 1-3, 6-7, 8-9)

[2] PEDRO VIGIO-APONTE,
a/k/a "Pedrito/ Pedrito He
Man/Pello/Pedrito Trauma",
(Counts 1-3, 6-7)

[3] FRANKIE ROSA-CALDERON,
a/k/a "Anky/El Negro/Frank",
(Counts 1-3)

[4] LUIS F. ALICEA-COLON,
a/k/a "Trenza/Enano/Luis Trenza",
(Counts 1-2, 4-5, 8-9)

[5] MIGUEL VAZQUEZ-MARTINEZ,
a/k/a "Miguelo/Radio/Miclo/BJ",
(Counts 1-3)

[6] RUBEN COTTO-ANDINO,
a/k/a "Ruben El Negro",
(Counts 1-3)

[7] ERNESTO MORALES-CASTRO,
a/k/a "Nesfor/Los Gorditos",
(Counts 1-3)

[8] CHRISTIAN MORALES-CASTRO,
a/k/a "Bimbo/Los Gorditos",
(Counts 1-3)

[9] REYFRANK QUIÑONES-CARRION,
a/k/a "Pelotero",
(Counts 1-3, 6-7)

[10] KELVIN D. MORALES-CINTRON,
(Counts 1-3)

[11] ISMAEL MENDEZ-ARROYO,
a/k/a "Bolillo",
(Counts 1-3)

[12] MICHAEL MUÑIZ-SANCHEZ,
(Counts 1-2)

[13] JONATHAN PEREZ-RODRIGUEZ,
a/k/a "Perra/Perreke",
(Counts 1-2)

INDICTMENT

CRIMINAL NO. 15-462(JAF)

VIOLATIONS:

COUNT ONE

Racketeer Influenced and Corrupt
Organizations Act, 18 U.S.C. §§ 1962(d)

COUNT TWO

Conspiracy to Possess with Intent to
Distribute a Controlled Substance Within a
Protected Location, 21 U.S.C. §§ 846 and
860

COUNT THREE

Using and Carrying Firearms During and in
Relation to a Drug Trafficking Crime, 18
U.S.C. § 924(c)(1)(A)

COUNTS FOUR, SIX, and EIGHT

Drive By Shooting, 18 U.S.C. § 36(b)(2)(A)

COUNTS FIVE, SEVEN, and NINE

Use and Carry of a Firearm During and in
Relation to a Crime of Violence, 18 U.S.C. §
924(c)(1)(A) and 924(j)(1)

RICO Forfeiture

18 U.S.C. § 1963

Narcotics Forfeiture Allegation

21 U.S.C. § 853

Firearms Forfeiture Allegation

28 U.S.C. § 2461(c)

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[14] JOSE L. ORTIZ-AGUIRRE,
a/k/a "Cheo/ Cheo Cedeño",
(Counts 1-3)

[15] REINALDO RODRIGUEZ-
MARTINEZ, a/k/a "Pitbull",
(Counts 1-3)

[16] WILLIAM ORTIZ-AGUIRRE,
a/k/a "Playa/Play",
(Counts 1-3)

[17] KIDANNY FIGUEROA-OSORIO,
a/k/a "Sony/Sonata",
(Counts 1-3)

[18] JOSE L. SOTO-RIVERA,
a/k/a "Luisito/ Scary",
(Counts 1-3, 6-7)

[19] JOSE E. MOJICA-ROBLES,
a/k/a "Papito Mojica",
(Counts 1-2)

[20] VICTOR M. RODRIGUEZ-TORRES,
a/k/a "Cuca/Cucaracha/Papotin",
(Counts 1-3, 6-7)

[21] RAFAEL ANDINO-OJEDA,
a/k/a "Rafa/ Rafa Colgate/Boca Chula",
(Counts 1-3)

[22] MYLES J. ROMAN-ADORNO,
(Counts 1-2)

[23] GUILLERMO SANCHEZ-MORA,
a/k/a "Guillo",
(Counts 1-2)

[24] EMANUEL ZABALA-PEREZ,
a/k/a "Punky/Dalmata",
(Counts 1-3, 6-7)

[25] ALEXANDER RIVERA-CARRION,
a/k/a "Lechon",
(Counts 1-3)

[26] DAVID E. RODRIGUEZ-CASTRO,
(Counts 1-2)

[27] RAFAEL HIRALDO-ALEJANDRO,
a/k/a "Bolillo",
(Counts 1-2)

[28] ALEXIS CARTAGENA-GERENA,
a/k/a "Pollo",
(Counts 1-3)

[29] ANGEL L. SOTO-RAMOS,
a/k/a "Huesito",
(Counts 1-2)

[30] OSCAR A. CALVIÑO-ACEVEDO,
a/k/a "Alex",
(Counts 1-3, 4-9)

[31] JESUS DE-JESUS-COLON,
a/k/a "Romulo",
(Counts 1-3)

[32] JOSE L. MENDEZ-DE-JESUS,
a/k/a "Sonso/Nariz",
(Counts 1-3)

[33] WILLIAM ZAMBRANA-SIERRA,
a/k/a "W/Willito",
(Counts 1-3, 4-5)

[34] EDGAR GONZALEZ-RIVERA,
a/k/a "Eggy",
(Counts 1-3)

[35] ARNALDO ALICEA-COLON,
a/k/a "Naldito",
(Counts 1-2)

[36] XAVIER CASTRO-VEGA,
a/k/a "Raton",
(Counts 1-3, 4-7)

[37] CARLOS M. GUERRERO-CASTRO,
a/k/a "Carlitos El Negro/Marcel",
(Counts 1-3, 8-9)

[38] ANALDI TANCO-MORENO,
a/k/a "Kimbiteo",
(Counts 1-3, 8-9)

[39] ORLANDO J. SANTANA,
a/k/a "Fino",
(Counts 1-3)

[40] LUIS F. RODRIGUEZ-MARQUEZ,
a/k/a "Cheykin",
(Counts 1-3)

[41] JESUS E. MONTALVAN-DIAZ,
a/k/a "Luis Garcia-Diaz/Willy Wonka",
(Counts 1-3)

[42] AMAURY MENDEZ-ROSADO,
a/k/a "Boty",
(Counts 1-3)

[43] LUIS YANYORE-PIZARRO,
a/k/a "Kimbo/Bauncer/Jose Boria-Millan",
(Counts 1-3, 4-7)

[44] FNU LNU,
a/k/a "Eziel",



(Counts 1-3)

[45] LUIS MARTINEZ-NIEVES,
a/k/a "Raya/Trenza",

(Counts 1-3)

[46] MICHAEL RIVERA-RODRIGUEZ,

(Counts 1-3)

[47] ALVIN A. CABEZAS-CINTRON,
a/k/a "Ardilla",

(Counts 1-3)

[48] JAIME M. SEMIDAY-PEREZ,

(Counts 1-3)

[49] KENNY O. PACHECO,
a/k/a "Keny/Bolin",

(Counts 1-3)

[50] ROBERTO FUENTES-PACHECO,
a/k/a "Junito Parcha",

(Counts 1-3)

[51] ROGER FALU-DIAZ,

a/k/a "Gua",

(Counts 1-3)

[52] FELIX A. MALAVE-TORRES,
a/k/a "Cholon",

(Counts 1-3)

[53] EDGARDO LUNA-LOPEZ,
a/k/a "Piri/ Enano",

(Counts 1-3)

[54] JESSY J. MELENDEZ-HERNANDEZ,
a/k/a "Koby/El Negro/Lely",

(Counts 1-3)

[55] DENZEL RODRIGUEZ-
CARABALLO,

(Counts 1-3)

[56] ABIMAEEL CRUZ-RODRIGUEZ,
a/k/a "Lindo/Feo/Metra",

(Counts 1-3)

[57] ANGEL L. COTTO-NEGRON,
a/k/a "Quija/Kija",

(Counts 1-2)

[58] JOSE E. RIVERA-MALDONADO,
a/k/a "Camon",

(Counts 1-2, 8-9)

[59] FNU LNU,
a/k/a "Gaby",



(Counts 1-3, 8-9)

[60] JOSE D. RESTO-FIGUEROA,
a/k/a "Tego",

(Counts 1-3, 8-9)

[61] ORLANDO PADILLA-AYALA,
a/k/a "Oreo/Willito/Angel M. Santiago-
Ayala",

(Counts 1-3, 8-9)

[62] KERNIS RODRIGUEZ-RIVERA,
a/k/a "Sosa",

(Counts 1-3)

[63] WALTER D. MULLER-COLON,
a/k/a "Vampy/Bolo",

(Counts 1-3)

[64] WILFREDO RUIZ,
a/k/a "Freddy",

(Counts 1-3)

[65] CARLOS E. BRIOSO-COLLANTES,
a/k/a "El Barber/Wiso El Barber",

(Counts 1-3)

[66] CARLOS VELAZQUEZ-FONTANEZ,
(Counts 1-3, 4-5)

[67] JONATHAN FIGUEROA-CATINCHI,
a/k/a "Katinchi",

(Counts 1-3)

[68] IRAM I. SANTANDER-ZULUETA,
a/k/a "Cubano"

(Counts 1-2)

[69] CHARLIE J. FOURNIER-COLLAZO,
a/k/a "Chiry",

(Counts 1-3)

[70] EDGARDO R. RUANO-CHEVERE,
a/k/a "Masacre/Masa",

(Counts 1-2)

[71] FRANCISCO J. GONZALEZ-
CAMACHO, a/k/a "Lento",

(Counts 1-2)

[72] NESTOR R. CONCEPCION-RIVERA,
a/k/a "Nesti/Kilate",

(Counts 1-3)

[73] IVETTE VAZQUEZ-DROZ,
a/k/a "Ive/ Precious Moments",

(Counts 1-2)

[74] BILLY VILLANUEVA-
CARRASQUILLO,

a/k/a "Meca/Billy Meca",

(Counts 1-2)

[75] JAYFRANK QUIÑONES-CARRION,

(Counts 1-2)

[76] FELIX RODRIGUEZ-RODRIGUEZ,
a/k/a "Correa/Balancelista/El Indio",

(Counts 1-3)

[77] DANIEL O. MARTINEZ-VELEZ,

a/k/a "Berto",

(Counts 1-3)

[78] LUIS F. DIAZ-TINEO,

a/k/a "Pipen/ Pipe",

(Counts 1-2)

[79] JOSUE O. FIGUEROA-RODRIGUEZ,

a/k/a "Gordo Puta",

(Counts 1-2)

[80] RAMON VICENTY-RIVERA,

a/k/a "Poke",

(Counts 1-2)

[81] LUIS E. GUADALUPE-CAMACHO,

a/k/a "Yaya/Yayi/Ardilla",

(Counts 1-2)

[82] JULIO N. MATOS-SANCHEZ,

a/k/a "Julio Maraña",

(Counts 1-2)

[83] REYNALDO GONZALEZ-ZAYAS,

a/k/a "Cuto",

(Counts 1-2)

[84] BRYAN MARTINEZ,

a/k/a "Fat Boy",

(Counts 1-3)

[85] DAMIAN FERNANDEZ-JORGE,

(Counts 1-2)

[86] JOSE A. FOURNIER-COLLAZO,

a/k/a "Semilla",

(Counts 1-3)

[87] KEVIN CASTRO-VEGA,

(Counts 1-3)

[88] JUAN GUADALUPE-DELGADO,

a/k/a "Bocao",

(Counts 1-3)

[89] DAVID GARCIA-FRANCO,
a/k/a "David Nota",

(Counts 1-3)

[90] GIOVANI JUSTINIANO-DIAZ,
a/k/a "Zegueta",

(Counts 1-3)

[91] CHRISTIAN VAZQUEZ-
HERNANDEZ, a/k/a "Chapa",

(Counts 1-3)

[92] JAMES STEELE-TORRES,
a/k/a "Negro Steele",

(Counts 1-2)

[93] NILDA SANTIAGO-ESPINOSA,
a/k/a "Katy/Kathy",

(Counts 1-2)

[94] ALEX SANTIAGO-CRESPO,
a/k/a "Papo Swing/Ale",

(Counts 1-2)

[95] FRANCISCO VARGAS-SANCHEZ,
a/k/a "Maraña",

(Counts 1-2)

[96] CARLOS MIRANDA,
a/k/a "Eo",

(Counts 1-2)

[97] RAMON ANDINO-PEGUERO,
a/k/a "Mono",

(Counts 1-2)

[98] VICTOR ALFONSO-JORGE,
a/k/a "Nano",

(Counts 1-3)

[99] HECTOR J. CRUZ-VARGAS,
a/k/a "Punky",

(Counts 1-3)

[100] YAMIL ARRIZMENDI-SANTANA,
a/k/a "El Mono",

(Counts 1-2)

[101] ROBERT D. PEREZ-NUÑEZ,
a/k/a "Minino",

(Counts 1-2)

[102] ANTHONY ESPADA-COLON,
a/k/a "Oreo/Apu",

(Counts 1-2)

[103] DANIEL DE-JESUS-DIAZ,
a/k/a "Paleta",

(Counts 1-3)

[104] LUIS E. ESPADA-COLON,
a/k/a "Zona"

(Counts 1-3)

[105] ASTRID J. MARTINEZ-VALENTIN,

a/k/a "La Jefa",

(Counts 1-2)

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

(Racketeer Influenced and Corrupt Organizations Act)

The Enterprise

At various times relevant to this Indictment, [1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father", [2] PEDRO VIGIO-APONTE a/k/a "Pedrito/Pedrito Herman/Pello/Pedrito Trauma", [3] FRANKIE ROSA-CALDERON a/k/a "Anky/El Negro/Frank", [4] LUIS F. ALICEA-COLON, a/k/a "Trenza/Enano/Luis Trenza", [5] MIGUEL VAZQUEZ-MARTINEZ, a/k/a "Miguelo/Radio/Miclo/BJ", [6] RUBEN COTTO-ANDINO, a/k/a "Ruben El Negro", [7] ERNESTO MORALES-CASTRO, a/k/a "Nestor/Los Gorditos", [8] CHRISTIAN MORALES-CASTRO, a/k/a "Bimbo/Los Gorditos", [9] REYFRANK QUIÑONES-CARRION, a/k/a "Pelotero", [10] KELVIN D. MORALES-CINTRON, [11] ISMAEL MENDEZ-ARROYO, a/k/a "Bolillo", [12] MICHAEL MUÑIZ-SANCHEZ, [13] JONATHAN PEREZ-RODRIGUEZ, a/k/a "Perra/Perreke", [14] JOSE L. ORTIZ-AGUIRRE, a/k/a "Cheo/Cheo Cedeño", [15] REINALDO RODRIGUEZ-MARTINEZ, a/k/a "Pitbull", [16] WILLIAM ORTIZ-AGUIRRE, a/k/a "Playa/Play", [17] KIDANNY FIGUEROA-OŠORIO, a/k/a "Sony/Sonata", [18] JOSE L. SOTO-RIVERA, a/k/a "Luisito/Scary", [19] JOSE E. MOJICA-ROBLES, a/k/a "Papito Mojica", [20] VICTOR M. RODRIGUEZ-TORRES, a/k/a "Cuca/Cucaracha/Papotin", [21] RAFAEL ANDINO-OJEDA, a/k/a "Rafa/Rafa Colgate/Boca Chula", [22] MYLES J. ROMAN-ADORNO, [23] GUILLERMO SANCHEZ-MORA, a/k/a "Guillo", [24] EMANUEL ZABALA-

PEREZ, a/k/a "Punky/Dalmata", [25] ALEXANDER RIVERA-CARRION, a/k/a "Lechon", [26] DAVID E. RODRIGUEZ-CASTRO, [27] RAFAEL HIRALDO-ALEJANDRO, a/k/a "Bolillo", [28] ALEXIS CARTAGENA-GERENA, a/k/a "Pollo", [29] ANGEL L. SOTO-RAMOS, a/k/a "Huesito", [30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a "Alex", [31] JESUS DE-JESUS-COLON, a/k/a "Romulo", [32] JOSE L. MENDEZ-DE-JESUS, a/k/a "Sonso/Nariz", [33] WILLIAM ZAMBRANA-SIERRA, a/k/a "W/Willito", [34] EDGAR GONZALEZ-RIVERA, a/k/a "Eggy", [35] ARNALDO ALICEA-COLON, a/k/a "Naldito", [36] XAVIER CASTRO-VEGA, a/k/a "Raton", [37] CARLOS M. GUERRERO-CASTRO, a/k/a "Carlitos El Negro/Marcel", [38] ANALDI TANCO-MORENO, a/k/a "Kimbato", [39] ORLANDO J. SANTANA, a/k/a "Fino", [40] LUIS F. RODRIGUEZ-MARQUEZ, a/k/a "Cheykin", [41] JESUS E. MONTALVAN-DIAZ, a/k/a "Luis Garcia-Diaz/Willy Wonka", [42] AMAURY MENDEZ-ROSADO, a/k/a "Boty", [43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Bauncer/Jose Boria-Millan", [44] FNU LNU, a/k/a "Eziel", [45] LUIS MARTINEZ-NIEVES, a/k/a "Raya/Trenza", [46] MICHAEL RIVERA-RODRIGUEZ, [47] ALVIN A. CABEZAS-CINTRON, a/k/a "Ardilla", [48] JAIME M. SEMIDAY-PEREZ, [49] KENNY O. PACHECO, a/k/a "Keny/Bolin", [50] ROBERTO FUENTES-PACHECO, a/k/a "Junito Parcha", [51] ROGER FALU-DIAZ, a/k/a "Gua", [52] FELIX A. MALAVE-TORRES, a/k/a "Cholon", [53] EDGARDO LUNA-LOPEZ, a/k/a "Piri/Enano", [54] JESSY J. MELENDEZ-HERNANDEZ, a/k/a "Koby/El Negro/Lely", [55] DENZEL RODRIGUEZ-CARABALLO, [56] ABIMAEEL CRUZ-RODRIGUEZ, a/k/a "Lindo/Feo/Metra", [57] ANGEL L. COTTO-NEGRON, a/k/a "Quija/Kija", [58] JOSE E. RIVERA-MALDONADO, a/k/a "Camon", [59] FNU LNU, a/k/a "Gaby", [60] JOSE D. RESTO-FIGUEROA, a/k/a "Tego", [61] ORLANDO PADILLA-AYALA, a/k/a "Oreo/Willito/Angel M. Santiago-Ayala", [62] KERNIS

RODRIGUEZ-RIVERA, a/k/a "Sosa", [63] WALTER D. MULLER-COLON, a/k/a "Vampy/Bolo", [64] WILFREDO RUIZ, a/k/a "Freddy", [65] CARLOS E. BRIOSO-COLLANTES, a/k/a "El Barber/Wiso El Barber", [66] CARLOS VELAZQUEZ-FONTANEZ, a/k/a "Pirin", [67] JONATHAN FIGUEROA-CATINCHI, a/k/a "Katinchi", [68] IRAM I. SANTANDER-ZULUETA, a/k/a "Cubano", [69] CHARLIE J. FOURNIER-COLLAZO, a/k/a "Chiry", [70] EDGARDO R. RUANO-CHEVERE, a/k/a "Masacre/Masa", [71] FRANCISCO J. GONZALEZ-CAMACHO, a/k/a "Lento", [72] NESTOR R. CONCEPCION-RIVERA, a/k/a "Nesti/Kilate", [73] IVETTE VAZQUEZ-DROZ, a/k/a "Ive/Precious Moments", [74] BILLY VILLANUEVA-CARRASQUILLO, a/k/a "Meca/Billy Meca", [75] JAYFRANK QUIÑONES-CARRION, [76] FELIX RODRIGUEZ-RODRIGUEZ, a/k/a "Correa/Balancelista/El Indio", [77] DANIEL O. MARTINEZ-VELEZ, a/k/a "Berto", [78] LUIS F. DIAZ-TINEO, a/k/a "Pipen/Pipe", [79] JOSUE O. FIGUEROA-RODRIGUEZ, a/k/a "Gordo Puta", [80] RAMON VICENTY-RIVERA, a/k/a "Poke", [81] LUIS E. GUADALUPE-CAMACHO, a/k/a "Yaya/Yayi/Ardilla", [82] JULIO N. MATOS-SANCHEZ, a/k/a "Julio Maraña", [83] REYNALDO GONZALEZ-ZAYAS, a/k/a "Cuto", [84] BRYAN MARTINEZ, a/k/a "Fat Boy", [85] DAMIAN FERNANDEZ-JORGE, [86] JOSE A. FOURNIER-COLLAZO, a/k/a "Semilla", [87] KEVIN CASTRO-VEGA, [88] JUAN GUADALUPE-DELGADO, a/k/a "Bocao", [89] DAVID GARCIA-FRANCO, a/k/a "David Nota", [90] GIOVANI JUSTINIANO-DIAZ, a/k/a "Zegueta", [91] CHRISTIAN VAZQUEZ-HERNANDEZ, a/k/a "Chapa", [92] JAMES STEELE-TORRES, a/k/a "Negro Steele", [93] NILDA SANTIAGO-ESPINOSA, a/k/a "Katy/Kathy", [94] ALEX SANTIAGO-CRESPO, a/k/a "Papo Swing/Ale", [95] FRANCISCO VARGAS-SANCHEZ, a/k/a "Maraña", [96] CARLOS MIRANDA, a/k/a "Eo", [97] RAMON ANDINO-PEGUERO, a/k/a "Mono", [98] VICTOR ALFONSO-JORGE, a/k/a "Nano", [99]

HECTOR J. CRUZ-VARGAS, a/k/a “Punky”, [100] YAMIL ARRIZMENDI-SANTANA, a/k/a “El Mono”, [101] ROBERT D. PEREZ-NUÑEZ, a/k/a “Minino”, [102] ANTHONY ESPADA-COLON, a/k/a “Oreo/Apu”, [103] DANIEL DE-JESUS-DIAZ, a/k/a “Paleta”, [104] LUIS E. ESPADA-COLON, a/k/a “Zona”, and [105] ASTRID J. MARTINEZ-VALENTIN, a/k/a “La Jefa”, the defendants herein, and others known and unknown, were members and associates of a criminal organization whose members and associates engaged in drug distribution, robbery and acts of violence, including murder. The criminal organization, referred to as La Rompe ONU or La Rompe, including its members and associates, constituted an “enterprise,” as defined by 18 U.S.C. § 1961(4) (“the enterprise”), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The enterprise was engaged in, and its activities affected, interstate, and foreign commerce.

Background of the Enterprise (La Rompe ONU)

Most street level drug sales in the San Juan, Puerto Rico, metropolitan area are controlled by gangs that operate in public housing projects. Generally, each housing project has its own gang which is organized in a similar fashion, leaders, drug point owners, enforcers, runners, sellers, drug processors, facilitators and look-outs. For decades these drug gangs fought over control of the drug points within the various housing projects. The violence associated with these battles regularly brought the attention of local and federal authorities, which negatively affected drug sales and resulted in large scale conspiracy indictments.

In or around 2004, the leaders from nearly all of the drug gangs in the San Juan, Puerto Rico, metropolitan area gathered for the purpose of conducting a meeting. At said meeting, the leaders agreed to form an alliance. The purpose of this alliance was to resolve conflict between

the previously rival drug gangs in a way that would not bring about the attention of local and federal authorities, thus ensuring increased profits from drug sales for all and reducing the risk of federal charges. They agreed that if conflict arose between members of the alliance, the leaders from the different housing projects would discuss the issue with each other to resolve it. At this meeting, the leaders named the alliance La ONU (ONU stands for: Organizacion de Narcotraficantes Unidos).

For a time, the alliance remained intact; members of drug gangs aligned with La ONU could visit and sell narcotics in other La ONU aligned housing projects, as long as they had the permission of the leader of each specific housing project. Additionally, the leaders of the different housing projects met regularly to discuss drug related issues and to resolve conflicts.

The alliance, however, weakened over time. Certain housing project gangs became disgruntled with La ONU and sought to break off. After several conflicts, in or about the year 2007, La ONU broke into two separate rival factions, La ONU and La Rompe ONU. Soon thereafter, the housing project gangs in the metropolitan area were essentially split evenly between those belonging to La ONU and La Rompe ONU.

From that point on, the goal of La Rompe ONU was to maintain control over the drug points in their housing projects by force and to kill La ONU members and leaders in order to expand. The leaders of La Rompe ONU continued to meet together to resolve internal conflicts and discuss strategies to take over housing projects under La ONU's control. La Rompe ONU leaders would regularly pool their resources to purchase weapons, vehicles, and other items to engage in violent acts. Also, the members from the various La Rompe ONU housing projects would jointly attack and commit murders of the La ONU members. Each housing project would provide some of their enforcers, or hit men, for these joint operations.

Members of La Rompe ONU that committed murders and other violent acts were given benefits, including weapons, money, and the ability to advance within the criminal enterprise. Though unwritten, the general rules members of La Rompe ONU had to follow, included, but were not limited to: 1) no associating with La ONU members; 2) kill La ONU members on sight; 3) no killing of other members of La Rompe ONU without leadership authorization; 4) no overtaking housing projects/drug points owned by another member of La Rompe ONU; and 5) no cooperating with law enforcement. Any violation of these rules resulted in punishment by death to the violator and their family.

Purposes of the Enterprise

The purposes of the enterprise included the following:

1. Enriching the members and associates of the enterprise through the distribution of narcotics.
2. Preserving and protecting the power, territory, and profits of the enterprise through the use of intimidation, violence, threats of violence, assault, and murder.
3. Concealing its activities by obstructing justice.
4. Promoting and enhancing the enterprise and its members' and associates' activities.
5. Keeping people in fear of the enterprise and in fear of its members and associates through threats of violence and murder.

Means and Methods of the Enterprise

Among the manner and means by which the defendants and co-conspirators conducted and participated in the conduct of the affairs of the enterprise were the following:

1. Members of the enterprise and their associates would act in different roles in order to further the goals of the enterprise, to wit: leaders, who directed and supervised, drug point owners, enforcers, suppliers, runners, sellers, and drug processors.
2. Members of the enterprise and their associates would purchase wholesale quantities of heroin, cocaine, and marijuana in order to distribute the same in street quantity amounts at their drug distribution points.
3. Members of the enterprise and their associates would purchase wholesale quantities of cocaine and would convert it into crack cocaine, "cooked", for subsequent sale and distribution at their drug distribution points.
4. Members of the enterprise and their associates would use residences and apartments within the controlled areas in order to store and conceal heroin, cocaine base ("crack"), cocaine, marijuana, drug paraphernalia, firearms, and ammunition.
5. Members of the enterprise and their associates would routinely possess, carry, brandish, and use firearms to protect themselves and their drug trafficking organization. At different points during the conspiracy, the leaders would provide to some members of the organization different types of firearms, including but not limited to "high power" rifles, in order to protect themselves, the narcotics and the profits from rival drug trafficking gangs.
6. Members of the enterprise and their associates promoted a climate of fear through violence and threats of violence. They would commonly use and threaten to use physical violence against their rivals.
7. Members of the enterprise and their associates committed, attempted, and threatened to commit acts of violence, including murder, to protect and expand the enterprise's

criminal operations. They were instructed to shoot and kill suspected rival drug trafficking members.

8. Members of the enterprise and their associates would use force, violence, and intimidation in order to intimidate rival drug trafficking organizations, and in order to discipline members of their own drug trafficking organization.
9. Members of the enterprise and their associates used violence against law enforcement officers to escape detection and apprehension. They would also pay bribes to law enforcement officers for information on informants or cooperators and for information as to law enforcement initiatives to disrupt the drug points.
10. Members of the enterprise and their associates would often alter their firearms (pistols and high power rifles) in order to make them fire in a fully automatic mode.
11. Members of the enterprise and their associates would pool resources with other housing projects aligned with La Rompe ONU in order to accomplish criminal acts.
12. Members of the enterprise and their associates provided shelter and protection to known fugitive members of La Rompe ONU in order to aid against their apprehension by law enforcement. Often, they would pay attorney's fees and bail money for lower level members to prevent cooperation with law enforcement.
13. Members of the enterprise and their associates would use two-way radios ("walkie-talkies" referred to as scanners) in order to communicate and alert the presence of law enforcement agents or members of rival gangs inside their controlled areas.
14. Members of the enterprise and their associates would rob persons and businesses at gun point.

15. Members of the enterprise and their associates would use the money obtained from the robberies to purchase drugs, firearms, and ammunition to be used in furtherance of La Rompe ONU.
16. Members of the enterprise and their associates conducted and participated in gun point robberies of motor vehicles (commonly referred to as "carjackings").
17. Members of the enterprise and their associates would in turn use the stolen motor vehicles during subsequent robberies and drive-by shootings.
18. The vehicles that were robbed were "cloned" that is members of the enterprise and their associates would locate an identical "legal" vehicle and would copy the license plate and VIN number to use the same in the "cloned" vehicle.

Roles of the Defendants

A. Leaders/Drug Point Owners/ Drug Point Administrators

Leaders directly controlled and supervised the drug trafficking activities at the drug points located at the Public Housing Projects controlled by La Rompe ONU, which include: Jardines del Paraiso Public Housing Project, Villa Andalucia Public Housing Project, Alturas de Cupey Public Housing Project, Jardines de Cupey Public Housing Project, Brisas de Cupey Public Housing Project, Los Claveles Public Housing Project, Nuestra Señora de Covadonga Public Housing Project, Los Lirios Public Housing Project, Jardines de Monte Hatillo Public Housing Project, Jardines de Campo Rico Public Housing Project, Jardines de Berwind Public Housing Project, San Martin Public Housing Project, Monte Park Public Housing Project, El Polvorin Ward, Villa Lomas Verdes Public Housing Project, Mango Sector and other areas nearby, within the Municipalities of San Juan, Trujillo Alto and Carolina, Puerto Rico.

Drug point owners purchased multi-kilogram quantities of narcotics and oversaw the transportation and sale of such narcotics at the drug points located at the Jardines del Paraiso Public Housing Project, Villa Andalucia Public Housing Project, Alturas de Cupey Public Housing Project, Jardines de Cupey Public Housing Project, Brisas de Cupey Public Housing Project, Los Claveles Public Housing Project, Nuestra Señora de Covadonga Public Housing Project, Los Lirios Public Housing Project, Jardines de Monte Hatillo Public Housing Project, Jardines de Campo Rico Public Housing Project, Jardines de Berwind Public Housing Project, El Polvoring Ward, Villa Lomas Verdes Public Housing Project, Mango Sector and other areas nearby, within the Municipalities of San Juan, Trujillo Alto and Carolina, Puerto Rico.

At various times during the course of the conspiracy, leaders purchased firearms and allowed members to use and carry such firearms and ammunition in order to protect the leaders and members of La Rompe ONU, the narcotics, the proceeds derived from their sales, and to further accomplish the goals of the conspiracy.

The following co-conspirators acted as leaders and drug point owners:

[1] **JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father"** was the main leader of La Rompe ONU.

In or about the year 2007, upon the arrest of an unindicted co-conspirator, [1] **JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father"** became the main leader of La Rompe ONU, wherefore he controlled, through co-defendants also acting as leaders, the drug distribution points located in the areas controlled by the enterprise. As the main leader, he directly supervised the operations of the drug points, received the proceeds from the distribution of narcotics sold during the span of his leadership in the conspiracy and was in charge of maintaining control of all the drug distribution activities. He had the final approving authority as

to the discipline to be imposed upon members of the conspiracy, as well as its enemies and rivals. At some point in the conspiracy, [1] **JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father"** was the "owner" of the crack cocaine and heroin sold at the Jardines del Paraiso Public Housing Project drug points. As the main leader, he would also receive payment or "rent" from other drug points, including but not limited to drug points located in Los Claveles, Villa Andalucia, and Nuestra Señora de Covadonga Public Housing Projects. He would also often act as an enforcer and as a supplier within the conspiracy. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to carry and use firearms during and in relation to the drug trafficking activities. As a supplier, he would supply narcotics and firearms, including but not limited to "high power" rifles, to other members of La Rompe ONU in order to further the goals of the conspiracy.

[2] **PEDRO VIGIO-APONTE a/k/a "Pedrito/Pedrito He-Man/Pello/Pedrito Trauma"** was also a leader in La Rompe ONU. He was the second in charge of La Rompe ONU. He was in charge of the drug points during the absence of the main leader. He would be in charge of the administration of the drug points and its daily operations. He would also act as a drug point owner and as an enforcer within the conspiracy. As a drug point owner, he was the "owner" of the crack cocaine, powder cocaine, and heroin sold at the Jardines del Paraiso, Villa Andalucia, Monte Hatillo, and Nuestra Señora de Covadonga Public Housing Projects. As an enforcer, he would carry and use firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to carry and use firearms during and in relation to the drug trafficking activities.

[3] **FRANKIE ROSA-CALDERON a/k/a “Anky/El Negro/Frank”** was also a leader in La Rompe ONU. Specifically, he was the leader at Alturas de Cupey Public Housing Project. He would also act as a drug point owner and as an enforcer within the conspiracy. He was the “owner” of the powder cocaine sold at the drug points in Los Claveles and Alturas de Cupey Public Housing Project. He was also known as the “owner” of the crack cocaine sold at the Jardines del Paraiso Public Housing Project drug point. As an enforcer, he would carry and use firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to carry and use firearms during and in relation to the drug trafficking activities.

[4] **LUIS F. ALICEA-COLON, a/k/a “Trenza/Enano/Luis Trenza”** was also a leader in La Rompe ONU. He would also act as a drug point owner and as an enforcer within the conspiracy. He was the “owner” of the crack cocaine and marijuana sold at the drug points in Los Laureles and Los Claveles Public Housing Projects and at El Mango sector. As an enforcer, he would carry and use firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to carry and use firearms during and in relation to the drug trafficking activities.

[5] **MIGUEL VAZQUEZ-MARTINEZ, a/k/a “Miguelo/Radio/Miclo/BJ”** was also a leader in La Rompe ONU. Specifically, he was the leader at Jardines de Monte Hatillo, San Martin, El Polvorin, Jardines de Berwind, Jardines de Campo Rico and Monte Park Public Housing Projects. He would also act as a drug point owner and as an enforcer within the conspiracy. He was the “owner” of the crack cocaine, powder cocaine, and marijuana that was sold at drug points in Jardines de Monte Hatillo and Nuestra Señora de Covadonga Public Housing Projects. At some point in the conspiracy, he was appointed by the main leader to

supervise the operations of the drug points at Jardines de Monte Hatillo, San Martin, El Polvorin, Jardines de Berwind, Jardines de Campo Rico, and Monte Park Public Housing Projects and maintaining the control of all the drug distribution activities in those areas. As an enforcer, he would carry and use firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to carry and use firearms during and in relation to the drug trafficking activities.

[6] RUBEN COTTO-ANDINO, a/k/a “Ruben El Negro” was also a leader in La Rompe ONU. Specifically, he was the leader at Jardines de Cupey and Brisas de Cupey Public Housing Projects. He would also receive payment or “rent” from the “owner” of the narcotics sold at the drug points in Jardines de Cupey Public Housing Project and Brisas de Cupey Public Housing Project.

[7] ERNESTO MORALES-CASTRO, a/k/a “Nestor/Los Gorditos” was also a leader in La Rompe ONU. He was the leader at Jardines de Cupey Public Housing Project jointly with his brother [8] CHRISTIAN MORALES-CASTRO, a/k/a “Bimbo/Los Gorditos”. He would also act as a drug point owner within the conspiracy. He was the “owner” of the crack cocaine sold at the drug point in Jardines de Cupey Public Housing Project. He would also use and carry firearms during and in relation to the drug trafficking activities.

[8] CHRISTIAN MORALES-CASTRO, a/k/a “Bimbo/Los Gorditos” was also a leader in La Rompe ONU. He was the leader at Jardines de Cupey Public Housing Project jointly with his brother [7] ERNESTO MORALES-CASTRO, a/k/a “Nestor/Los Gorditos”. He would also act as a drug point owner within the conspiracy. He was the “owner” of the crack cocaine sold at the drug point in Jardines de Cupey Public Housing Project. He would also use and carry firearms during and in relation to the drug trafficking activities.

[9] **REYFRANK QUIÑONES-CARRION, a/k/a "Pelotero"** was also a leader in La Rompe ONU. He was the leader at Nuestra Señora de Covadonga Public Housing Project. He would also act as a drug point owner and as an enforcer within the conspiracy. He was the "owner" of crack cocaine, powder cocaine, heroin, and marijuana sold at the drug points in Nuestra Señora de Covadonga Public Housing Project. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities.

[10] **KELVIN D. MORALES-CINTRON** acted as a drug point owner and a supplier for La Rompe ONU. He was the "owner" of the powder cocaine and marijuana sold at the drug point in Los Terrenos Ward, in Cupey. As a supplier, he would supply narcotics and firearms to other members of La Rompe ONU in order to further the goals of the conspiracy. He would also use and carry firearms during and in relation to the drug trafficking activities.

[11] **ISMAEL MENDEZ-ARROYO, a/k/a "Bolillo"** acted as a drug point owner and as an enforcer for La Rompe ONU. He was the "owner" of the crack cocaine and marijuana sold at the drug points in Los Claveles Public Housing Project and Nuestra Señora de Covadonga Public Housing Project. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities.

[12] **MICHAEL MUÑIZ-SANCHEZ** acted as a drug point owner and as an enforcer for La Rompe ONU. He was the "owner" of the marijuana sold at the drug point in Jardines de Monte Hatillo Public Housing Project. As an enforcer, he would use and carry firearms during

and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities.

[13] **JONATHAN PEREZ-RODRIGUEZ, a/k/a “Perra/Perreke”** acted as a drug point owner and as an enforcer for La Rompe ONU. He was the “owner” of the marijuana sold at the drug point in Jardines de Berwind Public Housing Project. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities.

[14] **JOSE L. ORTIZ-AGUIRRE, a/k/a “Cheo/Cheo Cedeño”** acted as a drug point owner for La Rompe ONU. He was the “owner” of the powder cocaine and marijuana sold at the drug point in Jardines del Paraiso Public Housing Project. He was also the “owner” of the powder cocaine sold at the drug point in Jardines de Monte Hatillo Public Housing Project. He would also use and carry firearms during and in relation to the drug trafficking activities.

[15] **REINALDO RODRIGUEZ-MARTINEZ, a/k/a “Pitbull”** acted as a drug point owner for La Rompe ONU. He was the “owner” of the powder cocaine sold at the drug point in Jardines del Paraiso Public Housing Project. He would also use and carry firearms during and in relation to the drug trafficking activities.

[16] **WILLIAM ORTIZ-AGUIRRE, a/k/a “Playa/Play”** acted as a drug point owner and as an enforcer for La Rompe ONU. He was the “owner” of the powder cocaine and the prescription pills sold at the drug point in Jardines del Paraiso Public Housing Project. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities.

[17] **KIDANNY FIGUEROA-OSORIO, a/k/a “Sony/Sonata”** acted as a drug point owner and as an enforcer for La Rompe ONU. He was the “owner” of the powder cocaine sold at the drug points in Nuestra Señora de Covadonga and Jardines del Paraiso Public Housing Projects. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities.

[18] **JOSE L. SOTO-RIVERA, a/k/a “Luisito/Scary”** acted as a drug point owner and as an enforcer for La Rompe ONU. He was the “owner” of the powder cocaine, crack cocaine, and marijuana sold at the drug points in Jardines de Monte Hatillo, Nuestra Señora de Covadonga, and Jardines del Paraiso Public Housing Projects. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities.

[19] **JOSE E. MOJICA-ROBLES, a/k/a “Papito Mojica”** acted as a drug point owner, as an enforcer, and as a drug processor for La Rompe ONU. He was the “owner” of the crack cocaine, powder cocaine, and marijuana sold at the drug points in Jardines de Monte Hatillo, Nuestra Señora de Covadonga, Jardines del Paraiso, and Los Laureles Public Housing Projects. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities. As a drug processor, he would “cook” or convert wholesale quantities of cocaine into crack cocaine.

[20] **VICTOR M. RODRIGUEZ-TORRES, a/k/a “Cuca/Cucaracha/Papotin”** acted as a drug point owner for La Rompe ONU. He was the “owner” of the marijuana sold at the drug

points in Jardines de Monte Hatillo and Nuestra Señora de Covadonga Public Housing Projects. He would also use and carry firearms during and in relation to the drug trafficking activities.

[21] **RAFAEL ANDINO-OJEDA, a/k/a "Rafa/Rafa Colgate/Boca Chula"** acted as a drug point owner and as an enforcer for La Rompe ONU. He was the "owner" of the heroin and the powder cocaine sold at the drug point in Jardines del Paraiso Public Housing Project. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities.

[22] **MYLES J. ROMAN-ADORNO** acted as a drug point owner for La Rompe ONU. He was the "owner" of the powder cocaine sold at the drug point in Nuestra Señora de Covadonga Public Housing Project.

[23] **GUILLERMO SANCHEZ-MORA, a/k/a "Guillo"** acted as a drug point owner for La Rompe ONU. He was the "owner" of the heroin sold at the drug points in Nuestra Señora de Covadonga and Jardines del Paraiso Public Housing Projects.

[24] **EMANUEL ZABALA-PEREZ, a/k/a "Punky/Dalmata"** acted as a drug point owner and as an enforcer for La Rompe ONU. He was the "owner" of the heroin and the marijuana sold at the drug points in Jardines del Paraiso and Nuestra Señora de Covadonga Public Housing Projects. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities.

[25] **ALEXANDER RIVERA-CARRION, a/k/a "Lechon"** acted as a drug point owner for La Rompe ONU. He was the "owner" of the powder cocaine and the marijuana sold at the

drug point in Alturas de Cupey Public Housing Project. He would also use and carry firearms during and in relation to the drug trafficking activities.

[26] **DAVID E. RODRIGUEZ-CASTRO** acted as a drug point owner for La Rompe ONU. He was the “owner” of the heroin sold at the drug point in Jardines de Cupey Public Housing Project.

[27] **RAFAEL HIRALDO-ALEJANDRO, a/k/a “Bolillo”** acted as a drug point owner for La Rompe ONU. He was the “owner” of the crack cocaine sold at the drug point in Jardines de Cupey Public Housing Project.

[28] **ALEXIS CARTAGENA-GERENA, a/k/a “Pollo”** acted as a drug point owner and a supplier for La Rompe ONU. He was the “owner” of the marijuana sold at the drug point in Alturas de Cupey Public Housing Project. As a supplier, he would supply narcotics and firearms, to other members of La Rompe ONU in order to further the goals of the conspiracy. He would also use and carry firearms during and in relation to the drug trafficking activities.

[29] **ANGEL L. SOTO-RAMOS, a/k/a “Huesito”** acted as a drug point owner for La Rompe ONU. He was the “owner” of the crack cocaine, powder cocaine, and marijuana sold at the drug point in Jardines de Monte Hatillo Public Housing Project.

[30] **OSCAR A. CALVIÑO-ACEVEDO, a/k/a “Alex”** acted as a drug point owner and as an enforcer for La Rompe ONU. He was the “owner” of the marijuana sold at the drug points in Los Laureles and Los Claveles Public Housing Projects. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities.

[31] **JESUS DE-JESUS-COLON, a/k/a "Romulo"** acted as a drug point owner and as an enforcer for La Rompe ONU. He was the "owner" of the marijuana and powder cocaine sold at the drug point in Los Laureles Public Housing Project. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities.

[32] **JOSE L. MENDEZ-DE-JESUS, a/k/a "Sonso/Nariz"** acted as a drug point owner and as an enforcer for La Rompe ONU. He was the "owner" of the marijuana sold at the drug point in Los Laureles Public Housing Project. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities.

[33] **WILLIAM ZAMBRANA-SIERRA, a/k/a "W/Willito"** acted as a drug point owner and as an enforcer for La Rompe ONU. He was the "owner" of the powder cocaine and marijuana sold at the drug point in Villa Lomas Verdes Public Housing Project. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities.

[34] **EDGAR GONZALEZ-RIVERA, a/k/a "Eggy"** acted as a drug point owner and as an enforcer for La Rompe ONU. He was the "owner" of the marijuana sold at the drug point in Los Claveles Public Housing Project. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation to the drug trafficking activities.

[35] **ARNALDO ALICEA-COLON, a/k/a "Naldito"** acted as a drug point owner for La Rompe ONU. He was the "owner" of the powder cocaine sold at the drug point in Villa Lomas Verdes Public Housing Project.

B. Enforcers

Enforcers possessed, carried, brandished, used and discharged firearms to protect the leaders and members of La Rompe ONU, the narcotics, the proceeds derived from their sales, and to further accomplish the goals of the conspiracy. Enforcers often acted upon instructions given by the leaders of this organization. Enforcers would often provide protection to La Rompe ONU's drug distribution points.

In addition to those previously mentioned leaders and drug point owners who also acted as enforcers, the following individuals and others known and unknown, acted as enforcers for La Rompe ONU:

[36] **XAVIER CASTRO-VEGA, a/k/a "Raton"** acted as an enforcer for La Rompe ONU. Additionally, he would often act as a drug point owner within the conspiracy.

[37] **CARLOS M. GUERRERO-CASTRO, a/k/a "Carlitos El Negro/Marcel"** acted as an enforcer for La Rompe ONU. Additionally, he would often act as a drug point owner and an armed seller within the conspiracy.

[38] **ANALDI TANCO-MORENO, a/k/a "Kimbito"** acted as an enforcer for La Rompe ONU. Additionally, he would often act as a runner and a seller within the conspiracy.

[39] **ORLANDO J. SANTANA, a/k/a "Fino"** acted as an enforcer for La Rompe ONU. Additionally, he would often act as a seller within the conspiracy.

[40] **LUIS F. RODRIGUEZ-MARQUEZ, a/k/a "Cheykin"** acted as an enforcer for La Rompe ONU. Additionally, he would often act as a drug point owner within the conspiracy.

[41] JESUS E. MONTALVAN-DIAZ, a/k/a "Luis Garcia-Diaz/Willy Wonka" acted as an enforcer for La Rompe ONU. Additionally, he would often act as an armed seller within the conspiracy.

[42] AMAURY MENDEZ-ROSADO, a/k/a "Boty" acted as an enforcer for La Rompe ONU. Additionally, he would often act as an armed seller within the conspiracy.

[43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Baucer/Jose Boria-Millan" acted as an enforcer for La Rompe ONU. Additionally, he would often act as a runner within the conspiracy.

[44] FNU LNU, a/k/a "Eziel" acted as an enforcer for La Rompe ONU. Additionally, he would often act as an armed seller within the conspiracy.

[45] LUIS MARTINEZ-NIEVES, a/k/a "Raya/Trenza" acted as an enforcer for La Rompe ONU. Additionally, he would often act as an armed seller within the conspiracy.

[46] MICHAEL RIVERA-RODRIGUEZ acted as an enforcer for La Rompe ONU. Additionally, he would often act as a drug point owner within the conspiracy.

[47] ALVIN A. CABEZAS-CINTRON, a/k/a "Ardilla" acted as an enforcer for La Rompe ONU. Additionally, he would often act as an armed seller within the conspiracy.

[48] JAIME M. SEMIDAY-PEREZ acted as an enforcer for La Rompe ONU.

[49] KENNY O. PACHECO, a/k/a "Keny/Bolin" acted as an enforcer for La Rompe ONU. Additionally, he would often act as an armed seller within the conspiracy.

[50] ROBERTO FUENTES-PACHECO, a/k/a "Junito Parcha" acted as an enforcer for La Rompe ONU. Additionally, he would often act as a drug point owner within the conspiracy.

[51] ROGER FALU-DIAZ, a/k/a "Gua" acted as an enforcer for La Rompe ONU.

[52] **FELIX A. MALAVE-TORRES, a/k/a "Cholon"** acted as an enforcer for La Rompe ONU.

[53] **EDGARDO LUNA-LOPEZ, a/k/a "Piri/Enano"** acted as an enforcer for La Rompe ONU. Additionally, he would often act as an armed seller within the conspiracy.

[54] **JESSY J. MELENDEZ-HERNANDEZ, a/k/a "Koby/El Negro/Lely"** acted as an enforcer for La Rompe ONU. Additionally, he would often act as a drug point owner within the conspiracy.

[55] **DENZEL RODRIGUEZ-CARABALLO** acted as an enforcer for La Rompe ONU.

[56] **ABIMAE L. CRUZ-RODRIGUEZ, a/k/a "Lindo/Feo/Metra"** acted as an enforcer for La Rompe ONU. Additionally, he would often act as a seller within the conspiracy.

[57] **ANGEL L. COTTO-NEGRON, a/k/a "Quija/Kija"** acted as an enforcer for La Rompe ONU. Additionally, he would often act as a runner within the conspiracy.

[58] **JOSE E. RIVERA-MALDONADO, a/k/a "Camon"** acted as an enforcer for La Rompe ONU. Additionally, he would often act as a seller within the conspiracy.

[59] **FNU LNU, a/k/a "Gaby"** acted as an enforcer for La Rompe ONU. Additionally, he would often act as a seller within the conspiracy.

[60] **JOSE D. RESTO-FIGUEROA, a/k/a "Tego"** acted as an enforcer for La Rompe ONU.

C. Suppliers

The suppliers were the defendants and their co-conspirators that would perform or carry out several acts within the conspiracy including but not limited to, supplying narcotics, firearms, and ammunition to La Rompe ONU in order to further the goals of the conspiracy by

maintaining the control and dominion over the drug distribution points located in the Municipality of San Juan, Carolina, and Trujillo Alto, Puerto Rico.

In addition to those previously mentioned, the following individuals and others known and unknown, acted as suppliers for La Rompe ONU:

[61] **ORLANDO PADILLA-AYALA, a/k/a “Oreo/Willito/Angel M. Santiago-Ayala”** acted as a supplier for La Rompe ONU. As a supplier, he would supply narcotics, firearms, and ammunition to other members of La Rompe ONU in order to further the goals of the conspiracy. He would also use and carry firearms during and in relation to the drug trafficking activities.

[62] **KERNIS RODRIGUEZ-RIVERA, a/k/a “Sosa”** acted as a supplier for La Rompe ONU. As a supplier, he would supply narcotics, firearms, and ammunition to other members of La Rompe ONU in order to further the goals of the conspiracy. He would also use and carry firearms during and in relation to the drug trafficking activities.

[63] **WALTER D. MULLER-COLON, a/k/a “Vampy/Bolo”** acted as a supplier for La Rompe ONU. As a supplier, he would supply firearms and ammunition to other members of La Rompe ONU in order to further the goals of the conspiracy. He would also use and carry firearms during and in relation to the drug trafficking activities.

[64] **WILFREDO RUIZ, a/k/a “Freddy”** acted as a supplier for the La Rompe ONU. As a supplier, he would supply ammunition to other members of La Rompe ONU in order to further the goals of the conspiracy. He would also use and carry firearms during and in relation to the drug trafficking activities.

[65] **CARLOS E. BRIOSO-COLLANTES, a/k/a “El Barber/Wiso El Barber”** acted as a supplier for La Rompe ONU. As a supplier, he would supply firearms and ammunition to

other members of La Rompe ONU in order to further the goals of the conspiracy. He would also use and carry firearms during and in relation to the drug trafficking activities.

[66] **CARLOS VELAZQUEZ-FONTANEZ** acted as a supplier for La Rompe ONU. As a supplier, he would supply firearms and ammunition to other members of La Rompe ONU in order to further the goals of the conspiracy. Additionally, he would often act as runner for La Rompe ONU. He would also use and carry firearms during and in relation to the drug trafficking activities.

[67] **JONATHAN FIGUEROA-CATINCHI, a/k/a "Katinchi"** acted as a supplier for La Rompe ONU. As a supplier, he would supply firearms and ammunition to other members of La Rompe ONU in order to further the goals of the conspiracy. Additionally, he would often act as facilitator for the drug trafficking organization. As a facilitator, he would fix, clean, and alter firearms, such as pistols and high power rifles, in order to make them fire in a fully automatic mode. He would also use and carry firearms during and in relation to the drug trafficking activities.

[68] **IRAM I. SANTANDER-ZULUETA, a/k/a "Cubano"** acted as a supplier for La Rompe ONU. As a supplier, he would supply marijuana to the organization.

D. Runners

The runners worked under the direct supervision of the leaders of La Rompe ONU. They were responsible for providing sufficient narcotics to the sellers for further distribution at the drug point. They were also responsible for collecting the proceeds of drug sales and paying the street sellers. They would also supervise and make sure that there were street sellers for every shift of the drug point. They would make schedules and prepare ledgers to maintain accountability of the sales of the narcotics sold at the drug point. At various times, they would be

responsible for recruiting street sellers and additional runners. The runners had a supervisory role within the conspiracy, as they would directly supervise on a daily basis, the activities of multiple sellers, and the daily activities of the drug points.

In addition to the enforcers and suppliers who also acted as runners, the following individuals and others known and unknown, acted as runners for La Rompe ONU:

[69] **CHARLIE J. FOURNIER-COLLAZO, a/k/a “Chiry”** acted as a runner for La Rompe ONU. Additionally, he would often act as an armed seller within the conspiracy and would also use and carry firearms during and in relation to the drug trafficking activities.

[70] **EDGARDO R. RUANO-CHEVERE, a/k/a “Masacre/Masa”** acted as a runner for La Rompe ONU. Additionally, he would often act as a seller for the drug trafficking organization.

[71] **FRANCISCO J. GONZALEZ-CAMACHO, a/k/a “Lento”** acted as a runner for La Rompe ONU. Additionally, he would often act as a seller for the drug trafficking organization.

[72] **NESTOR R. CONCEPCION-RIVERA, a/k/a “Nesti/Kilate”** acted as a runner for La Rompe ONU. Additionally, he would often act as a drug point owner within the conspiracy and would also use and carry firearms during and in relation to the drug trafficking activities.

[73] **IVETTE VAZQUEZ-DROZ, a/k/a “Ive/Precious Moments”** acted as a runner for La Rompe ONU.

[74] **BILLY VILLANUEVA-CARRASQUILLO, a/k/a “Meca/Billy Meca”** acted as a runner for La Rompe ONU.

[75] **JAYFRANK QUIÑONES-CARRION** acted as a runner for La Rompe ONU.

[76] **FELIX RODRIGUEZ-RODRIGUEZ, a/k/a "Correa/Baloncelista/El Indio"** acted as a runner for La Rompe ONU. Additionally, he would often act as a seller within the conspiracy and would also use and carry firearms during and in relation to the drug trafficking activities.

[77] **DANIEL O. MARTINEZ-VELEZ, a/k/a "Berto"** acted as a runner for La Rompe ONU. Additionally, he would often act as a seller within the conspiracy and would also use and carry firearms during and in relation to the drug trafficking activities.

[78] **LUIS F. DIAZ-TINEO, a/k/a "Pipen/Pipe"** acted as a runner for La Rompe ONU.

[79] **JOSUE O. FIGUEROA-RODRIGUEZ, a/k/a "Gordo Puta"** acted as a runner for La Rompe ONU.

E. Sellers

The sellers would distribute street quantity amounts of heroin, crack cocaine, cocaine, marijuana, oxycodone (commonly known as Percocet), and alprazolam (commonly known as Xanax). As sellers, they were accountable for the drug proceeds and the narcotics sold at the drug distribution points. At times, sellers would use two-way radios ("walkie-talkies", "scanners") in order to communicate with other members of the conspiracy.

In addition to the above-mentioned enforcers, suppliers, and runners, who also acted as sellers, the following individuals and others known and unknown, acted as sellers for La Rompe ONU:

[80] **RAMON VICENTY-RIVERA, a/k/a "Poke"**, who would also use and carry firearms during and in relation to the drug trafficking activities,

[81] **LUIS E. GUADALUPE-CAMACHO, a/k/a "Yaya/Yayi/Ardilla"**,

[82] **JULIO N. MATOS-SANCHEZ, a/k/a "Julio Maraña"**,

[83] REYNALDO GONZALEZ-ZAYAS, a/k/a "Cuto",

[84] BRYAN MARTINEZ, a/k/a "Fat Boy", who would also use and carry firearms during and in relation to the drug trafficking activities,

[85] DAMIAN FERNANDEZ-JORGE,

[86] JOSE A. FOURNIER-COLLAZO, a/k/a "Semilla", who would also use and carry firearms during and in relation to the drug trafficking activities,

[87] KEVIN CASTRO-VEGA, who would also use and carry firearms during and in relation to the drug trafficking activities,

[88] JUAN GUADALUPE-DELGADO, a/k/a "Bocao", who would also use and carry firearms during and in relation to the drug trafficking activities,

[89] DAVID GARCIA-FRANCO, a/k/a "David Nota", who would also use and carry firearms during and in relation to the drug trafficking activities,

[90] GIOVANI JUSTINIANO-DIAZ, a/k/a "Zegueta", who would also use and carry firearms during and in relation to the drug trafficking activities,

[91] CHRISTIAN VAZQUEZ-HERNANDEZ, a/k/a "Chapa", who would also use and carry firearms during and in relation to the drug trafficking activities,

[92] JAMES STEELE-TORRES, a/k/a "Negro Steele",

[93] NILDA SANTIAGO-ESPINOSA, a/k/a "Katy/Kathy",

[94] ALEX SANTIAGO-CRESPO, a/k/a "Papo Swing/Ale",

[95] FRANCISCO VARGAS-SANCHEZ, a/k/a "Maraña",

[96] CARLOS MIRANDA, a/k/a "Eo", who would also use and carry firearms during and in relation to the drug trafficking activities,

[97] RAMON ANDINO-PEGUERO, a/k/a "Mono", who would also use and carry firearms during and in relation to the drug trafficking activities,

[98] VICTOR ALFONSO-JORGE, a/k/a "Nano", who would also use and carry firearms during and in relation to the drug trafficking activities,

[99] HECTOR J. CRUZ-VARGAS, a/k/a "Punky", who would also use and carry firearms during and in relation to the drug trafficking activities,

[100] YAMIL ARRIZMENDI-SANTANA, a/k/a "El Mono",

[101] ROBERT D. PEREZ-NUÑEZ, a/k/a "Minino",

[102] ANTHONY ESPADA-COLON, a/k/a "Oreo/Apu",

[103] DANIEL DE-JESUS-DIAZ, a/k/a "Paleta", who would also use and carry firearms during and in relation to the drug trafficking activities,

[104] LUIS E. ESPADA-COLON, a/k/a "Zona", who would also use and carry firearms during and in relation to the drug trafficking activities.

F. Drug Processors

Drug processors would meet under the direction of the leaders of La Rompe ONU and would weigh, cut, mix, and prepare the controlled substances for street distribution. They would also package the heroin, crack, cocaine, and marihuana in single dosage amounts and in distinctive "baggies", "decks", and "vials".

In addition to the above-mentioned leaders, drug point owners, enforcers, suppliers, runners, and sellers, who also acted as drug processors, the following individuals and others known and unknown, acted as drug processors for the above described drug trafficking organization:

[105] ASTRID J. MARTINEZ-VALENTIN, a/k/a “La Jefa” acted as a drug processor for La Rompe ONU.

Racketeering Conspiracy

Beginning on a date unknown, but no later than in or about the year 2007, and continuing up to and until the return of the instant Indictment, in the District of Puerto Rico and within the jurisdiction of this Court,

- [1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a “Mayito/Mayo/El Father”,
- [2] PEDRO VIGIO-APONTE a/k/a “Pedrito/Pedrito He-Man/Pello/Pedrito Trauma”,
- [3] FRANKIE ROSA-CALDERON a/k/a “Anky/El Negro/Frank”,
- [4] LUIS F. ALICEA-COLON, a/k/a “Trenza/Enano/Luis Trenza”,
- [5] MIGUEL VAZQUEZ-MARTINEZ, a/k/a “Miguelo/Radio/Miclo/BJ”,
- [6] RUBEN COTTO-ANDINO, a/k/a “Ruben El Negro”,
- [7] ERNESTO MORALES-CASTRO, a/k/a “Nestor/Los Gorditos”,
- [8] CHRISTIAN MORALES-CASTRO, a/k/a “Bimbo/Los Gorditos”,
- [9] REYFRANK QUIÑONES-CARRION, a/k/a “Pelotero”,
- [10] KELVIN D. MORALES-CINTRON,
- [11] ISMAEL MENDEZ-ARROYO, a/k/a “Bolillo”,
- [12] MICHAEL MUÑIZ-SANCHEZ,
- [13] JONATHAN PEREZ-RODRIGUEZ, a/k/a “Perra/Perreke”,
- [14] JOSE L. ORTIZ-AGUIRRE, a/k/a “Cheo/Cheo Cedeño”,
- [15] REINALDO RODRIGUEZ-MARTINEZ, a/k/a “Pitbull”,
- [16] WILLIAM ORTIZ-AGUIRRE, a/k/a “Playa/Play”,
- [17] KIDANNY FIGUEROA-OSORIO, a/k/a “Sony/Sonata”;
- [18] JOSE L. SOTO-RIVERA, a/k/a “Luisito/Scary”,
- [19] JOSE E. MOJICA-ROBLES, a/k/a “Papito Mojica”,
- [20] VICTOR M. RODRIGUEZ-TORRES, a/k/a “Cuca/Cucaracha/Papotin”,
- [21] RAFAEL ANDINO-OJEDA, a/k/a “Rafa/Rafa Colgate/Boca Chula”,
- [22] MYLES J. ROMAN-ADORNO,
- [23] GUILLERMO SANCHEZ-MORA, a/k/a “Guillo”,
- [24] EMANUEL ZABALA-PEREZ, a/k/a “Punky/Dalmata”,
- [25] ALEXANDER RIVERA-CARRION, a/k/a “Lechon”,
- [26] DAVID E. RODRIGUEZ-CASTRO,
- [27] RAFAEL HIRALDO-ALEJANDRO, a/k/a “Bolillo”,
- [28] ALEXIS CARTAGENA-GERENA, a/k/a “Pollo”,
- [29] ANGEL L. SOTO-RAMOS, a/k/a “Huesito”,
- [30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a “Alex”,
- [31] JESUS DE-JESUS-COLON, a/k/a “Romulo”,
- [32] JOSE L. MENDEZ-DE-JESUS, a/k/a “Sonso/Nariz”,
- [33] WILLIAM ZAMBRANA-SIERRA, a/k/a “W/Willito”,
- [34] EDGAR GONZALEZ-RIVERA, a/k/a “Eggy”,

- [35] ARNALDO ALÍCEA-COLON, a/k/a "Naldito",
- [36] XAVIER CASTRO-VEGA, a/k/a "Raton",
- [37] CARLOS M. GUERRERO-CASTRO, a/k/a "Carlitos El Negro/Marcel",
- [38] ANALDI TANCO-MORENO, a/k/a "Kimbito",
- [39] ORLANDO J. SANTANA, a/k/a "Fino",
- [40] LUIS F. RODRIGUEZ-MARQUEZ, a/k/a "Cheykin",
- [41] JESUS E. MONTALVAN-DIAZ, a/k/a "Luis Garcia-Diaz/Willy Wonka",
- [42] AMAURY MENDEZ-ROSADO, a/k/a "Boty",
- [43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Bauncer/Jose Boria-Millan",
- [44] FNU LNU, a/k/a "Eziel",
- [45] LUIS MARTINEZ-NIEVES, a/k/a "Raya/Trenza",
- [46] MICHAEL RIVERA-RODRIGUEZ,
- [47] ALVIN A. CABEZAS-CINTRON, a/k/a "Ardilla",
- [48] JAIME M. SEMIDAY-PEREZ,
- [49] KENNY O. PACHECO, a/k/a "Keny/Bolin",
- [50] ROBERTO FUENTES-PACHECO, a/k/a "Junito Parcha",
- [51] ROGER FALU-DIAZ, a/k/a "Gua",
- [52] FELIX A. MALAVE-TORRES, a/k/a "Cholon",
- [53] EDGARDO LUNA-LOPEZ, a/k/a "Piri/Enano",
- [54] JESSY J. MELENDEZ-HERNANDEZ, a/k/a "Koby/El Negro/Lely",
- [55] DENZEL RODRIGUEZ-CARABALLO,
- [56] ABIMAEEL CRUZ-RODRIGUEZ, a/k/a "Lindo/Feo/Metra",
- [57] ANGEL L. COTTO-NEGRON, a/k/a "Quija/Kija",
- [58] JOSE E. RIVERA-MALDONADO, a/k/a "Camon",
- [59] FNU LNU, a/k/a "Gaby",
- [60] JOSE D. RESTO-FIGUEROA, a/k/a "Tego",
- [61] ORLANDO PADILLA-AYALA, a/k/a "Oreo/Willito/Angel M. Santiago-Ayala",
- [62] KERNIS RODRIGUEZ-RIVERA, a/k/a "Sosa",
- [63] WALTER D. MULLER-COLON, a/k/a "Vampy/Bolo",
- [64] WILFREDO RUIZ, a/k/a "Freddy",
- [65] CARLOS E. BRIOSO-COLLANTES, a/k/a "El Barber/Wiso El Barber",
- [66] CARLOS VELAZQUEZ-FONTANEZ, a/k/a "Pirin",
- [67] JONATHAN FIGUEROA-CATINCHI, a/k/a "Katinchi",
- [68] IRAM I. SANTANDER-ZULUETA, a/k/a "Cubano",
- [69] CHARLIE J. FOURNIER-COLLAZO, a/k/a "Chiry",
- [70] EDGARDO R. RUANO-CHEVERE, a/k/a "Masacre/Masa",
- [71] FRANCISCO J. GONZALEZ-CAMACHO, a/k/a "Lento",
- [72] NESTOR R. CONCEPCION-RIVERA, a/k/a "Nesti/Kilate",
- [73] IVETTE VAZQUEZ-DROZ, a/k/a "Ive/Precious Moments",
- [74] BILLY VILLANUEVA-CARRASQUILLO, a/k/a "Meca/Billy Meca",
- [75] JAYFRANK QUIÑONES-CARRION,
- [76] FELIX RODRIGUEZ-RODRIGUEZ, a/k/a "Correa/Baloncelista/El Indio",
- [77] DANIEL O. MARTINEZ-VELEZ, a/k/a "Berto",
- [78] LUIS F. DIAZ-TINEO, a/k/a "Pipen/Pipe",
- [79] JOSUE O. FIGUEROA-RODRIGUEZ, a/k/a "Gordo Puta",
- [80] RAMON VICENTY-RIVERA, a/k/a "Poke",

- [81] LUIS E. GUADALUPE-CAMACHO, a/k/a "Yaya/Yayi/Ardilla",
- [82] JULIO N. MATOS-SANCHEZ, a/k/a "Julio Maraña",
- [83] REYNALDO GONZALEZ-ZAYAS, a/k/a "Cufo",
- [84] BRYAN MARTINEZ, a/k/a "Fat Boy",
- [85] DAMIAN FERNANDEZ-JORGE,
- [86] JOSE A. FOURNIER-COLLAZO, a/k/a "Semilla",
- [87] KEVIN CASTRO-VEGA,
- [88] JUAN GUADALUPE-DELGADO, a/k/a "Bocao",
- [89] DAVID GARCIA-FRANCO, a/k/a "David Nota",
- [90] GIOVANI JUSTINIANO-DIAZ, a/k/a "Zegueta",
- [91] CHRISTIAN VAZQUEZ-HERNANDEZ, a/k/a "Chapa",
- [92] JAMES STEELE-TORRES, a/k/a "Negro Steele",
- [93] NILDA SANTIAGO-ESPINOSA, a/k/a "Katy/Kathy",
- [94] ALEX SANTIAGO-CRESPO, a/k/a "Papo Swing/Ale",
- [95] FRANCISCO VARGAS-SANCHEZ, a/k/a "Maraña",
- [96] CARLOS MIRANDA, a/k/a "Eo",
- [97] RAMON ANDINO-PEGUERO, a/k/a "Mono",
- [98] VICTOR ALFONSO-JORGE, a/k/a "Nano",
- [99] HECTOR J. CRUZ-VARGAS, a/k/a "Punky",
- [100] YAMIL ARRIZMENDI-SANTANA, a/k/a "El Mono",
- [101] ROBERT D. PEREZ-NUÑEZ, a/k/a "Minino",
- [102] ANTHONY ESPADA-COLON, a/k/a "Oreo/Apu",
- [103] DANIEL DE-JESUS-DIAZ, a/k/a "Paleta",
- [104] LUIS E. ESPADA-COLON, a/k/a "Zona",
- [105] ASTRID J. MARTINEZ-VALENTIN, a/k/a "La Jefa",

the defendants and others known and unknown, being persons employed by and associated with the La Rompe ONU enterprise, which engaged in, and the activities of which affected, interstate, and foreign commerce, knowingly and intentionally conspired to violate 18 U.S.C. § 1962(c), that is, to conduct and participate, directly, and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity consisting of multiple acts involving:

1. Drug trafficking, including cocaine base (commonly referred to as "crack"), cocaine, heroin, marijuana, oxycodone (commonly known as Percocet), and alprazolam (commonly known as Xanax), in violation of the laws of the United States, that being, 21 U.S.C. §§ 841 and 846;

2. Robbery, chargeable under Articles 35 (attempt), 198 (general robbery statute) and 249 (conspiracy) of the 2004 Puerto Rico Penal Code and Articles 35 (attempt), 189 (general robbery statute) and 244 (conspiracy) of the 2012 Puerto Rico Penal Code;
3. Murder, chargeable under Articles 35 (attempt), 105 (general murder statute), 106 (first degree and second degree murder), and 249 (conspiracy) of the 2004 Puerto Rico Penal Code and Articles 35 (attempt), 92 (general murder statute), 93 (first degree and second degree murder) and 244 (conspiracy) of the 2012 Puerto Rico Penal Code; and
4. Acts indictable under 18 U.S.C. §§ 1951 and 2 (interference with commerce by robbery).

It was a part of the conspiracy that the defendants agreed that a conspirator would commit at least two (2) acts of racketeering activity in the conduct of the affairs of the enterprise.

Overt Acts

In furtherance of the racketeering conspiracy, and to effect the object thereof, the defendants and their co-conspirators committed and caused to be committed the following overt acts, among others, on or about the following dates, in the District of Puerto Rico and within the jurisdiction of this Court:

1. On or about February 26, 2007, [32] **JOSE L. MENDEZ-DE-JESUS, a/k/a “Sonso/Nariz”** possessed marijuana.
2. On or about October 31, 2007, [31] **JESUS DE-JESUS-COLON, a/k/a “Romulo”** possessed one (1) Type: Pistol, Make: Taurus, Caliber: 9mm, Serial Number: TOD72701.
3. On or about December 5, 2007, [47] **ALVIN A. CABEZAS-CINTRON, a/k/a “Ardilla”** possessed one (1) Type: Pistol, Make: Smith & Wesson, Model: SW9VE, Caliber: 9mm, Serial Number: PBF6590.

4. On or about January 11, 2008, [31] **JESUS DE-JESUS-COLON**, a/k/a “Romulo” possessed one (1) Rifle, Caliber: .22, Make: Rugger, Model: 1022, Serial Number: 114-98271.
5. On or about February 3, 2008, [63] **WALTER D. MULLER-COLON**, a/k/a “Vampy/Bolo” and [86] **JOSE A. FOURNIER-COLLAZO**, a/k/a “Semilla” possessed one (1) Type: Pistol, Make: Glock, Model: 32, Caliber: .357, Serial Number: obliterated.
6. On or about February 21, 2008, [8] **CHRISTIAN MORALES-CASTRO**, a/k/a “Bimbo/Los Gorditos” possessed one (1) Type: Pistol, Make: Glock, Model: 21, Caliber: .45, Serial Number: FHB-741, one (1) Type: Pistol, Make: FNH, Model: Five Seven Semie, Caliber: 5.7 x 28, Serial Number: 38G124564, and one (1) Rifle, Caliber: 7.62 x 39, Serial Number: AD028382.
7. On or about February 29, 2008, [11] **ISMAEL MENDEZ-ARROYO**, a/k/a “Bolillo” possessed marijuana.
8. On or about March 05, 2008, [2] **PEDRO VIGIO-APONTE**, a/k/a “Pedrito/Pedrito He-Man/Pello/Pedrito Trauma” possessed cocaine.
9. On or about October 9, 2008, [32] **JOSE L. MENDEZ-DE-JESUS**, a/k/a “Sonso/Nariz” possessed cocaine and marijuana.
10. On or about November 6, 2008, [11] **ISMAEL MENDEZ-ARROYO**, a/k/a “Bolillo” possessed marijuana, cocaine, and heroin.
11. On or about January 21, 2009, [74] **BILLY VILLANUEVA-CARRASQUILLO**, a/k/a “Meca/Billy Meca” possessed marijuana, cocaine, and heroin.

12. On or about June 13, 2009, [39] **ORLANDO J. SANTANA, a/k/a "Fino"** possessed one (1) Type: Pistol, Make: Taurus, Model: PT9ZAF, Caliber: 9mm, Serial Number: TYF95500 and marijuana.
13. On or about July 8, 2009, [76] **FELIX RODRIGUEZ-RODRIGUEZ, a/k/a "Correa/Balancelista/El Indio"** possessed marijuana, cocaine, and heroin.
14. On or about August 29, 2009, [16] **WILLIAM ORTIZ-AGUIRRE, a/k/a "Playa/Play"** and [53] **EDGARDO LUNA-LOPEZ, a/k/a "Piri/Enano"** possessed marijuana, cocaine, and heroin.
15. On or about September 2, 2009, [81] **LUIS E. GUADALUPE-CAMACHO, a/k/a "Yaya/Yayi/Ardilla"** possessed marijuana.
16. On or about September 11, 2009, [12] **MICHAEL MUÑIZ-SANCHEZ** possessed one (1) Type: Pistol, Make: Glock, Model: 20, Caliber: .357, Serial Number: GKV-411.
17. On or about September 13, 2009, [49] **KENNY O. PACHECO, a/k/a "Keny/Bolin"** possessed one (1) Type: Pistol, Make: Glock, Model: 23, Caliber: .40, Serial Number: KMR-688.
18. On or about October 31, 2009, [50] **ROBERTO FUENTES-PACHECO, a/k/a "Junito Parcha"** possessed one (1) Type: Pistol, Make: Smith & Wesson, Model: 5906, Caliber: 9mm, Serial Number: TCL5650.
19. On or about December 4, 2009, [18] **JOSE L. SOTO-RIVERA, a/k/a "Luisito/Scary"** possessed one (1) Type: Revolver, Make: Magnum, Caliber: .357, Model: 65-3, Serial Number: AEY0037.

20. On or about May 6, 2010, [31] JESUS DE-JESUS-COLON, a/k/a "Romulo" possessed one (1) Type: Revolver, Make: Colt, Model: Magnum, Caliber: .357, Serial Number: L-73556.
21. On or about June 2, 2010, [31] JESUS DE-JESUS-COLON, a/k/a "Romulo" possessed marijuana.
22. On or about September 14, 2010, [47] ALVIN A. CABEZAS-CINTRON, a/k/a "Ardilla" possessed one (1) Type: Pistol, Make: Smith & Wesson, Model: 5906, Caliber: 9mm, Serial Number: TYN3286.
23. On or about December 23, 2010, [95] FRANCISCO VARGAS-SANCHEZ, a/k/a "Maraña" possessed marijuana, cocaine, and heroin.
24. On or about February 8, 2011, [1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father" contacted [4] LUIS F. ALICEA-COLON, a/k/a "Trenza/Enano/Luis Trenza" and ordered him to kill DAVID GONZALEZ-REYES a/k/a "Chispa", a fellow member of La Rompe. ONU, because DAVID GONZALEZ-REYES a/k/a "Chispa" wanted to kill [1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father".
25. On or about February 8, 2011, [4] LUIS F. ALICEA-COLON, a/k/a "Trenza/Enano/Luis Trenza", [19] JOSE E. MOJICA-ROBLES, a/k/a "Papito Mojica", [43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Bauncer/Jose Boria-Millan", and [57] ANGEL L. COTTO-NEGRON, a/k/a "Quija/Kija" shot and killed DAVID GONZALEZ-REYES a/k/a "Chispa".
26. On or about March 9, 2011, [57] ANGEL L. COTTO-NEGRON, a/k/a "Quija/Kija" possessed ammunition.

27. On or April 8, 2011, [17] **KIDANNY FIGUEROA-OSORIO**, a/k/a “Sony/Sonata” possessed one (1) Type: Pistol, Make: S&W, Model: 6906, Caliber: 9mm, Serial Number: VAN0235.
28. On or about April 29, 2011, [39] **ORLANDO J. SANTANA**, a/k/a “Fino” possessed cocaine and marijuana.
29. On or about May 10, 2011, [32] **JOSE L. MENDEZ-DE-JESUS**, a/k/a “Sonso/Nariz” possessed one (1) Type: Pistol, Make: Glock, Model: 23, Caliber: .40, Serial Number: AUS819.
30. On or about May 10, 2011, [19] **JOSE E. MOJICA-ROBLES**, a/k/a “Papito Mojica” ordered that **RICCO LUIS DAVILA-DIAZ** be killed because he had betrayed La Rompe ONU. [4] **LUIS F. ALICEA-COLON**, a/k/a “Trenza/ Enano/Luis Trenza” also authorized the murder.
31. On or about May 10, 2011, [30] **OSCAR A. CALVIÑO-ACEVEDO**, a/k/a “Alex”, [33] **WILLIAM ZAMBRANA-SIERRA**, a/k/a “W/Willito”, and [43] **LUIS YANYORE-PIZARRO**, a/k/a “Kimbo/Bouncer/Jose Boria-Millan” shot and killed **RICCO LUIS DAVILA-DIAZ**.
32. On or about June 25, 2011, [4] **LUIS F. ALICEA-COLON**, a/k/a “Trenza/ Enano/Luis Trenza” ordered that **HERVIN VALCARCEL-MARTINEZ**, a/k/a “Prieto”, a member of a rival drug trafficking organization be killed. On that date, [66] **CARLOS VELAZQUEZ-FONTANEZ** informed members of La Rompe ONU that **HERVIN VALCARCEL-MARTINEZ**, a/k/a “Prieto” was at a business washing cars with his associates. With that information, [30] **OSCAR A. CALVIÑO-ACEVEDO**, a/k/a “Alex”, [33] **WILLIAM ZAMBRANA-SIERRA**, a/k/a “W/Willito”, [36] **XAVIER**

CASTRO-VEGA, a/k/a "Raton", and [43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Baucer/Jose Boria-Millan" drove to the business and shot and killed EDWIN DIAZ-CRUZ, HERVIN VALCARCEL-MARTINEZ, a/k/a "Prieto", JAVIER CATALA-BERMUDEZ, and ORLANDO MELENDEZ-VILLEGAS.

33. On or about July 20, 2011, [1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father" ordered the murder of SANTOS DIAZ-CAMACHO, a/k/a "Joel Bazooka", a member of La Rompe ONU, because he had allied himself with a rival drug trafficking organization.

34. On or about July 20, 2011, [9] REYFRANK QUIÑONES-CARRION, a/k/a "Pelotero" informed members of La Rompe ONU that SANTOS DIAZ-CAMACHO, a/k/a "Joel Bazooka" was in a vehicle and that another vehicle was escorting him. With that information, [1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father", [2] PEDRO VIGIO-APONTE, a/k/a "Pedrito/Pedrito He-Man/Pello/Pedrito Trauma", [9] REYFRANK QUIÑONES-CARRION, a/k/a "Pelotero", [18] JOSE L. SOTO-RIVERA, a/k/a "Luisito/Scary", [20] VICTOR M. RODRIGUEZ-TORRES, a/k/a "Cuca/Cucaracha/Papotin", [24] EMANUEL ZABALA-PEREZ, a/k/a "Punky/Dalmata", [30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a "Alex", [36] XAVIER CASTRO-VEGA, a/k/a "Raton", [43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Baucer/Jose Boria-Millan", and others known and unknown shot and killed SANTOS DIAZ-CAMACHO, a/k/a "Joel Bazooka", JUAN ROSARIO-MERCADO, a/k/a "Toñito", and KEVIN SOTO-ROMAN, a/k/a "El Gordo".

35. On or about July 21, 2011, [91] **CHRISTIAN VAZQUEZ-HERNANDEZ, a/k/a “Chapa”** possessed one (1) Type: Pistol, Make: Smith & Wesson, Model: MP, Caliber: .40, Serial Number: DTK3757.
36. On or about August 3, 2011, [97] **RAMON ANDINO-PEGUERO, a/k/a “Mono”** possessed one (1) Type: Pistol, Make: Glock, Model: 23, Caliber: .40, Serial Number: EAW185 and one (1) Type: Pistol, Make: Glock, Model: 22, Caliber: .40, Serial Number: RFD072.
37. On or about October 27, 2011, [33] **WILLIAM ZAMBRANA-SIERRA, a/k/a “W/Willito”, [36] XAVIER CASTRO-VEGA, a/k/a “Raton”, and [58] ANGEL L. COTTO-NEGRON, a/k/a “Quija/Kija”** possessed one (1) Type: Pistol, Make: Glock, Model: 22, Caliber: .40, Serial Number: ERZ359, one (1) Type: Pistol, Make: S&W, Model: MP, Caliber: .40, Serial Number: MPB2756, one (1) Type: Pistol, Make: Glock, Model: 22, Caliber: .40, Serial Number: EHC046, one (1) Rifle, Caliber: 7.62 x 39, Model: WASR-10, Serial Number: 1-70605-4, one (1) Rifle, Caliber: .223, Serial Number: 052220, marijuana, heroin, and cocaine.
38. On or about August 28, 2012, [61] **ORLANDO PADILLA-AYALA, a/k/a “Oreo/Willito/Angel M. Santiago-Ayala”** went to [1] **JOSUE VAZQUEZ-CARRASQUILLO, a/k/a “Mayito/Mayo/El Father”** and requested that **LUIS ENRIQUE OJEDA-ANDINO, a/k/a “Pollo”,** who was a member of La Rompe, be handed over because he had killed his brother, a fellow member of La Rompe ONU. [1] **JOSUE VAZQUEZ-CARRASQUILLO, a/k/a “Mayito/Mayo/El Father”** agreed with the request and allowed [61] **ORLANDO PADILLA-AYALA, a/k/a “Oreo/Willito/Angel M. Santiago-Ayala”** to kill **LUIS ENRIQUE OJEDA-ANDINO,**

a/k/a "Pollo". Then, [61] **ORLANDO PADILLA-AYALA**, a/k/a "Oreo/Willito/Angel M. Santiago-Ayala" provided money, firearms, a Trail Blazer, and an Explorer to the members of La Rompe ONU that were going to kill LUIS ENRIQUE OJEDA-ANDINO, a/k/a "Pollo".

39. On or about August 28, 2012, [4] **LUIS F. ALICEA-COLON**, a/k/a "Trenza/Enano/Luis Trenza", [30] **OSCAR A. CALVIÑO-ACEVEDO**, a/k/a "Alex", [37] **CARLOS M. GUERRERO-CASTRO**, a/k/a "Carlitos El Negro/Marcel", [38] **ANALDI TANCO-MORENO**, a/k/a "Kimbato", [58] **JOSE E. RIVERA-MALDONADO**, a/k/a "Camon", [59] **FNU LNU**, a/k/a "Gaby", and [60] **JOSE D. RESTO-FIGUEROA**, a/k/a "Tego", and others known and unknown shot and killed LUIS OJEDA-ANDINO, a/k/a "Pollo," LUIS VELAZQUEZ-AQUINO, a/k/a "Urraca", and JOSE AYALA-GARCIA.

40. On or about March 22, 2012, [90] **GIOVANI JUSTINIANO-DIAZ**, a/k/a "Zegueta" possessed one (1) Type: Pistol, Make: Glock, Model: 27, Caliber: .40, Serial Number: RUC484.

41. On or about March 22, 2012, [9] **REYFRANK QUIÑONES-CARRION**, a/k/a "Pelotero" possessed one (1) Type: Pistol, Make: Glock, Model: 32a, Caliber: .357, Serial Number: LKP505.

42. On or about January 2, 2013, [34] **EDGAR GONZALEZ-RIVERA**, a/k/a "Eggy" possessed one (1) Rifle, Caliber: 5.56, Make: Colt, Serial Number: obliterated, marijuana, and cocaine.

43. On or about April 30, 2013, [14] **JOSE L. ORTIZ-AGUIRRE, a/k/a "Cheo/Cheo Cedeño"** possessed one (1) Type: Pistol, Make: Glock, Model: 22, Caliber: .40, Serial Number: ACY-867.
44. On or about May 9, 2013, [77] **DANIEL O. MARTINEZ-VELEZ, a/k/a "Berto"** possessed cocaine, marijuana, and heroin.
45. On or about August 20, 2013, [37] **CARLOS M. GUERRERO-CASTRO, a/k/a "Carlitos El Negro/Marcel"** possessed marijuana, cocaine, and heroin.
46. On or about September 13, 2013, [52] **FELIX A. MALAVE-TORRES, a/k/a "Cholon"** possessed one (1) Type: Revolver, Make: Ruger, Model: Speed-Six, Caliber: .357, Serial Number: 158-14081.
47. On or about November 5, 2013, [64] **WILFREDO RUIZ, a/k/a "Freddy"** possessed one (1) Rifle, Caliber: 7.62 x 39, Make: Draco Romarm/Cugir, Serial Number: DC-7805-11 RO.
48. On or about November 19, 2013, [90] **GIOVANI JUSTINIANO-DIAZ, a/k/a "Zegueta"** possessed marijuana and cocaine.
49. On or about November 25, 2013, [52] **FELIX A. MALAVE-TORRES, a/k/a "Cholon"** possessed one (1) Rifle, Caliber: 7.62 x 39, Model: GP WASR-10-63, Make: ROMARM, Serial Number: 1973 ET 0988 and one (1) Type: Revolver, Make: Colt, Model: Detective Special, Caliber: .38, Serial Number: 44539.
50. On or about February 20, 2014, [93] **NILDA SANTIAGO-ESPINOSA, a/k/a "Katy/Kathy"** possessed heroin, cocaine, and marijuana.
51. On or about April 11, 2014, [97] **RAMON ANDINO-PEGUERO, a/k/a "Mono"** possessed marijuana, heroin, and cocaine.

All in violation of 18 U.S.C. § 1962(d).

Notice of Special Findings for Count One
(Conspiracy to Possess with Intent to Distribute a Controlled Substance)

Beginning on a date unknown, but no later than in or about the year 2007, and continuing up to and until the return of the instant Indictment, in the District of Puerto Rico and within the jurisdiction of this Court,

- [1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father",
- [2] PEDRO VIGIO-APONTE a/k/a "Pedrito/Pedrito He-Man/Pello/Pedrito Trauma",
- [3] FRANKIE ROSA-CALDERON a/k/a "Anky/El Negro/Frank",
- [4] LUIS F. ALICEA-COLON, a/k/a "Trenza/Enano/Luis Trenza",
- [5] MIGUEL VAZQUEZ-MARTINEZ, a/k/a "Miguelo/Radio/Miclo/BJ",
- [6] RUBEN COTTO-ANDINO, a/k/a "Ruben El Negro",
- [7] ERNESTO MORALES-CASTRO, a/k/a "Nestor/Los Gorditos",
- [8] CHRISTIAN MORALES-CASTRO, a/k/a "Bimbo/Los Gorditos",
- [9] REYFRANK QUIÑONES-CARRION, a/k/a "Pelotero",
- [10] KELVIN D. MORALES-CINTRON,
- [11] ISMAEL MENDEZ-ARROYO, a/k/a "Bolillo",
- [12] MICHAEL MUÑIZ-SANCHEZ,
- [13] JONATHAN PEREZ-RODRIGUEZ, a/k/a "Perra/Perreke",
- [14] JOSE L. ORTIZ-AGUIRRE, a/k/a "Cheo/Cheo Cedeño",
- [15] REINALDO RODRIGUEZ-MARTINEZ, a/k/a "Pitbull",
- [16] WILLIAM ORTIZ-AGUIRRE, a/k/a "Playa/Play",
- [17] KIDANNY FIGUEROA-OSORIO, a/k/a "Sony/Sonata";
- [18] JOSE L. SOTO-RIVERA, a/k/a "Luisito/Scary",
- [19] JOSE E. MOJICA-ROBLES, a/k/a "Papito-Mojica",
- [20] VICTOR M. RODRIGUEZ-TORRES, a/k/a "Cuca/Cucaracha/Papotin",
- [21] RAFAEL ANDIÑO-OJEDA, a/k/a "Rafa/Rafa Colgate/Boca Chula",
- [22] MYLES J. ROMAN-ADORNO,
- [23] GUILLERMO SANCHEZ-MORA, a/k/a "Guillo",
- [24] EMANUEL ZABALA-PEREZ, a/k/a "Punky/Dalmata",
- [25] ALEXANDER RIVERA-CARRION, a/k/a "Lechon",
- [26] DAVID E. RODRIGUEZ-CASTRO,
- [27] RAFAEL HIRALDO-ALEJANDRO, a/k/a "Bolillo",
- [28] ALEXIS CARTAGENA-GERENA, a/k/a "Pollo",
- [29] ANGEL L. SOTO-RAMOS, a/k/a "Huesito",
- [30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a "Alex",
- [31] JESUS DE-JESUS-COLON, a/k/a "Romulo",
- [32] JOSE L. MENDEZ-DE-JESUS, a/k/a "Sonso/Nariz",
- [33] WILLIAM ZAMBRANA-SIERRA, a/k/a "W/Willito",
- [34] EDGAR GONZALEZ-RIVERA, a/k/a "Eggy",

- [35] ARNALDO ALICEA-COLON, a/k/a "Naldito",
- [36] XAVIER CASTRO-VEGA, a/k/a "Raton",
- [37] CARLOS M. GUERRERO-CASTRO, a/k/a "Carlitos El Negro/Marcel",
- [38] ANALDI TANCO-MORENO, a/k/a "Kimbato",
- [39] ORLANDO J. SANTANA, a/k/a "Fino",
- [40] LUIS F. RODRIGUEZ-MARQUEZ, a/k/a "Cheykin",
- [41] JESUS E. MONTALVAN-DIAZ, a/k/a "Luis Garcia-Diaz/Willy Wonka",
- [42] AMAURY MENDEZ-ROSADO, a/k/a "Boty",
- [43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Bauncer/Jose Boria-Millan",
- [44] FNU LNU, a/k/a "Eziel",
- [45] LUIS MARTINEZ-NIEVES, a/k/a "Raya/Trenza",
- [46] MICHAEL RIVERA-RODRIGUEZ,
- [47] ALVIN A. CABEZAS-CINTRON, a/k/a "Ardilla",
- [48] JAIME M. SEMIDAY-PEREZ,
- [49] KENNY O. PACHECO, a/k/a "Keny/Bolin",
- [50] ROBERTO FUENTES-PACHECO, a/k/a "Junito Parcha",
- [51] ROGER FALU-DIAZ, a/k/a "Gua",
- [52] FELIX A. MALAVE-TORRES, a/k/a "Cholon",
- [53] EDGARDO LUNA-LOPEZ, a/k/a "Piri/Enano",
- [54] JESSY J. MELENDEZ-HERNANDEZ, a/k/a "Koby/El Negro/Lely",
- [55] DENZEL RODRIGUEZ-CARABALLO,
- [56] ABIMAEL CRUZ-RODRIGUEZ, a/k/a "Lindo/Feo/Metra",
- [57] ANGEL L. COTTO-NEGRON, a/k/a "Quija/Kija",
- [58] JOSE E. RIVERA-MALDONADO, a/k/a "Camon",
- [59] FNU LNU, a/k/a "Gaby",
- [60] JOSE D. RESTO-FIGUEROA, a/k/a "Tego",
- [61] ORLANDO PADILLA-AYALA, a/k/a "Oreo/Willito/Angel M. Santiago-Ayala",
- [62] KERNIS RODRIGUEZ-RIVERA, a/k/a "Sosa",
- [63] WALTER D. MULLER-COLON, a/k/a "Vampy/Bolo",
- [64] WILFREDO RUIZ, a/k/a "Freddy",
- [65] CARLOS E. BRIOSO-COLLANTES, a/k/a "El Barber/Wiso El Barber",
- [66] CARLOS VELAZQUEZ-FONTANEZ, a/k/a "Pirin",
- [67] JONATHAN FIGUEROA-CATINCHI, a/k/a "Katinchi",
- [68] IRAM I. SANTANDER-ZULUETA, a/k/a "Cubano",
- [69] CHARLIE J. FOURNIER-COLLAZO, a/k/a "Chiry",
- [70] EDGARDO R. RUANO-CHEVERE, a/k/a "Masacre/Masa",
- [71] FRANCISCO J. GONZALEZ-CAMACHO, a/k/a "Lento",
- [72] NESTOR R. CONCEPCION-RIVERA, a/k/a "Nesti/Kilate",
- [73] IVETTE VAZQUEZ-DROZ, a/k/a "Ive/Precious Moments",
- [74] BILLY VILLANUEVA-CARRASQUILLO, a/k/a "Meca/Billy Meca",
- [75] JAYFRANK QUIÑONES-CARRION,
- [76] FELIX RODRIGUEZ-RODRIGUEZ, a/k/a "Correa/Baloncelista/El Indio",
- [77] DANIEL O. MARTINEZ-VELEZ, a/k/a "Berto",
- [78] LUIS F. DIAZ-TINEO, a/k/a "Pipen/Pipe",
- [79] JOSUE O. FIGUEROA-RODRIGUEZ, a/k/a "Gordo Puta",
- [80] RAMON VICENTY-RIVERA, a/k/a "Poke",

- [81] LUIS E. GUADALUPE-CAMACHO, a/k/a "Yaya/Yayi/Ardilla",
- [82] JULIO N. MATOS-SANCHEZ, a/k/a "Julio Maraña",
- [83] REYNALDO GONZALEZ-ZAYAS, a/k/a "Cuto",
- [84] BRYAN MARTINEZ, a/k/a "Fat Boy",
- [85] DAMIAN FERNANDEZ-JORGE,
- [86] JOSE A. FOURNIER-COLLAZO, a/k/a "Semilla",
- [87] KEVIN CASTRO-VEGA,
- [88] JUAN GUADALUPE-DELGADO, a/k/a "Bocao",
- [89] DAVID GARCIA-FRANCO, a/k/a "David Nota",
- [90] GIOVANI JUSTINIANO-DIAZ, a/k/a "Zegueta",
- [91] CHRISTIAN VAZQUEZ-HERNANDEZ, a/k/a "Chapa",
- [92] JAMES STEELE-TORRES, a/k/a "Negro Steele",
- [93] NILDA SANTIAGO-ESPINOSA, a/k/a "Katy/Kathy",
- [94] ALEX SANTIAGO-CRESPO, a/k/a "Papo Swing/Ale",
- [95] FRANCISCO VARGAS-SANCHEZ, a/k/a "Maraña",
- [96] CARLOS MIRANDA, a/k/a "Eo",
- [97] RAMON ANDINO-PEGUERO, a/k/a "Mono",
- [98] VICTOR ALFONSO-JORGE, a/k/a "Nano",
- [99] HECTOR J. CRUZ-VARGAS, a/k/a "Punky",
- [100] YAMIL ARRIZMENDI-SANTANA, a/k/a "El Mono",
- [101] ROBERT D. PEREZ-NUÑEZ, a/k/a "Minino",
- [102] ANTHONY ESPADA-COLON, a/k/a "Oreo/Apu",
- [103] DANIEL DE-JESUS-DIAZ, a/k/a "Paleta",
- [104] LUIS E. ESPADA-COLON, a/k/a "Zona",
- [105] ASTRID J. MARTINEZ-VALENTIN, a/k/a "La Jefa",

the defendants herein, did knowingly and intentionally, combine, conspire, and agree with each other and with diverse other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and intentionally possess with intent to distribute and to distribute controlled substances, to wit: in excess of two hundred and eighty (280) grams of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II Narcotic Drug Controlled Substance; in excess of one (1) kilogram of a mixture or substance containing a detectable amount of heroin, a Schedule I, Narcotic Drug Controlled Substance; and in excess of five (5) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance; in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A). All in violation of 21 U.S.C. § 846.

COUNT TWO

(Conspiracy to Possess with Intent to Distribute a Controlled Substance)

Beginning on a date unknown, but no later than in or about the year 2007, and continuing up to and until the return of the instant Indictment, in the District of Puerto Rico and within the jurisdiction of this Court,

- [1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father",
- [2] PEDRO VIGIO-APONTE a/k/a "Pedrito/Pédrito He-Man/Pello/Pedrito Trauma",
- [3] FRANKIE ROSA-CALDERON a/k/a "Anky/El Negro/Frank",
- [4] LUIS F. ALICEA-COLON, a/k/a "Trenza/Enano/Luis Trenza",
- [5] MIGUEL VAZQUEZ-MARTINEZ, a/k/a "Miguelo/Radio/Miclo/BJ",
- [6] RUBEN COTTO-ANDINO, a/k/a "Ruben El Negro",
- [7] ERNESTO MORALES-CASTRO, a/k/a "Nestor/Los Gorditos",
- [8] CHRISTIAN MORALES-CASTRO, a/k/a "Bimbo/Los Gorditos",
- [9] REYFRANK QUIÑONES-CARRION, a/k/a "Pelotero",
- [10] KELVIN D. MORALES-CINTRON,
- [11] ISMAEL MENDEZ-ARROYO, a/k/a "Bolillo",
- [12] MICHAEL MUÑIZ-SANCHEZ,
- [13] JONATHAN PEREZ-RODRIGUEZ, a/k/a "Perra/Perreke",
- [14] JOSE L. ORTIZ-AGUIRRE, a/k/a "Cheo/Cheo Cedeño",
- [15] REINALDO RODRIGUEZ-MARTINEZ, a/k/a "Pitbull",
- [16] WILLIAM ORTIZ-AGUIRRE, a/k/a "Playa/Play",
- [17] KIDANNY FIGUEROA-OSORIO, a/k/a "Sony/Sonata",
- [18] JOSE L. SOTO-RIVERA, a/k/a "Luisito/Scary",
- [19] JOSE E. MOJICA-ROBLES, a/k/a "Papito Mojica",
- [20] VICTOR M. RODRIGUEZ-TORRES, a/k/a "Cuca/Cucaracha/Papotin",
- [21] RAFAEL ANDINO-OJEDA, a/k/a "Rafa/Rafa Colgate/Boca Chula",
- [22] MYLES J. ROMAN-ADORNO,
- [23] GUILLERMO SANCHEZ-MORA, a/k/a "Guillo",
- [24] EMANUEL ZABALA-PEREZ, a/k/a "Punky/Dalmata",
- [25] ALEXANDER RIVERA-CARRION, a/k/a "Lechon",
- [26] DAVID E. RODRIGUEZ-CASTRO,
- [27] RAFAEL HIRALDO-ALEJANDRO, a/k/a "Bolillo",
- [28] ALEXIS CARTAGENA-GERENA, a/k/a "Pollo",
- [29] ANGEL L. SOTO-RAMOS, a/k/a "Huesito",
- [30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a "Alex",
- [31] JESUS DE-JESUS-COLON, a/k/a "Romulo",
- [32] JOSE L. MENDEZ-DE-JESUS, a/k/a "Sonso/Nariz",
- [33] WILLIAM ZAMBRANA-SIERRA, a/k/a "W/Willito",
- [34] EDGAR GONZALEZ-RIVERA, a/k/a "Eggy",
- [35] ARNALDO ALICEA-COLON, a/k/a "Naldito",
- [36] XAVIER CASTRO-VEGA, a/k/a "Raton",
- [37] CARLOS M. GUERRERO-CASTRO, a/k/a "Carlitos El Negro/Marcel",

- [38] ANALDI TANCO-MORENO, a/k/a "Kimbato",
- [39] ORLANDO J. SANTANA, a/k/a "Fino",
- [40] LUIS F. RODRIGUEZ-MARQUEZ, a/k/a "Cheykin",
- [41] JESUS E. MONTALVAN-DIAZ, a/k/a "Luis Garcia-Diaz/Willy Wonka",
- [42] AMAURY MENDEZ-ROSADO, a/k/a "Boty",
- [43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Bauncer/Jose Boria-Millan",
- [44] FNU LNU, a/k/a "Eziel",
- [45] LUIS MARTINEZ-NIEVES, a/k/a "Raya/Trenza",
- [46] MICHAEL RIVERA-RODRIGUEZ,
- [47] ALVIN A. CABEZAS-CINTRON, a/k/a "Ardilla",
- [48] JAIME M. SEMIDAY-PEREZ,
- [49] KENNY O. PACHECO, a/k/a "Keny/Bolin",
- [50] ROBERTO FUENTES-PACHECO, a/k/a "Junito Parcha",
- [51] ROGER FALU-DIAZ, a/k/a "Gua",
- [52] FELIX A. MALAVE-TORRES, a/k/a "Cholon",
- [53] EDGARDO LUNA-LOPEZ, a/k/a "Piri/Enano",
- [54] JESSY J. MELENDEZ-HERNANDEZ, a/k/a "Koby/EI Negro/Lely",
- [55] DENZEL RODRIGUEZ-CARABALLO,
- [56] ABIMAEEL CRUZ-RODRIGUEZ, a/k/a "Lindo/Feo/Metra",
- [57] ANGEL L. COTTO-NEGRON, a/k/a "Quija/Kija",
- [58] JOSE E. RIVERA-MALDONADO, a/k/a "Camon",
- [59] FNU LNU, a/k/a "Gaby",
- [60] JOSE D. RESTO-FIGUEROA, a/k/a "Tego",
- [61] ORLANDO PADILLA-AYALA, a/k/a "Oreo/Willito/Angel M. Santiago-Ayala",
- [62] KERNIS RODRIGUEZ-RIVERA, a/k/a "Sosa",
- [63] WALTER D. MULLER-COLON, a/k/a "Vampy/Bolo",
- [64] WILFREDO RUIZ, a/k/a "Freddy",
- [65] CARLOS E. BRIOSO-COLLANTES, a/k/a "El Barber/Wiso El Barber",
- [66] CARLOS VELAZQUEZ-FONTANEZ, a/k/a "Pirin",
- [67] JONATHAN FIGUEROA-CATINCHI, a/k/a "Katinchí",
- [68] IRAM I. SANTANDER-ZULUETA, a/k/a "Cubano",
- [69] CHARLIE J. FOURNIER-COLLAZO, a/k/a "Chiry",
- [70] EDGARDO R. RUANO-CHEVERE, a/k/a "Masacre/Masa",
- [71] FRANCISCO J. GONZALEZ-CAMACHO, a/k/a "Lento",
- [72] NESTOR R. CONCEPCION-RIVERA, a/k/a "Nesti/Kilate",
- [73] IVETTE VAZQUEZ-DROZ, a/k/a "Ive/Precious Moments",
- [74] BILLY VILLANUEVA-CARRASQUILLO, a/k/a "Meca/Billy Meca",
- [75] JAYFRANK QUIÑONES-CARRION,
- [76] FELIX RODRIGUEZ-RODRIGUEZ, a/k/a "Correa/Balancelista/El Indio",
- [77] DANIEL O. MARTINEZ-VELEZ, a/k/a "Berto",
- [78] LUIS F. DIAZ-TINEO, a/k/a "Pipen/Pipe",
- [79] JOSUE O. FIGUEROA-RODRIGUEZ, a/k/a "Gordo Puta",
- [80] RAMON VICENTY-RIVERA, a/k/a "Poke",
- [81] LUIS E. GUADALUPE-CAMACHO, a/k/a "Yaya/Yayi/Ardilla",
- [82] JULIO N. MATOS-SANCHEZ, a/k/a "Julio Maraña",
- [83] REYNALDO GONZALEZ-ZAYAS, a/k/a "Cuto",

- [84] BRYAN MARTINEZ, a/k/a "Fat Boy",
- [85] DAMIAN FERNANDEZ-JORGE,
- [86] JOSE A. FOURNIER-COLLAZO, a/k/a "Semilla",
- [87] KEVIN CASTRO-VEGA,
- [88] JUAN GUADALUPE-DELGADO, a/k/a "Bocao",
- [89] DAVID GARCIA-FRANCO, a/k/a "David Nota",
- [90] GIOVANI JUSTINIANO-DIAZ, a/k/a "Zegueta",
- [91] CHRISTIAN VAZQUEZ-HERNANDEZ, a/k/a "Chapa",
- [92] JAMES STEELE-TORRES, a/k/a "Negro Steele",
- [93] NILDA SANTIAGO-ESPINOSA, a/k/a "Katy/Kathy",
- [94] ALEX SANTIAGO-CRESPO, a/k/a "Papo Swing/Ale",
- [95] FRANCISCO VARGAS-SANCHEZ, a/k/a "Maraña",
- [96] CARLOS MIRANDA, a/k/a "Eo",
- [97] RAMON ANDINO-PEGUERO, a/k/a "Mono",
- [98] VICTOR ALFONSO-JORGE, a/k/a "Nano",
- [99] HECTOR J. CRUZ-VARGAS, a/k/a "Punky",
- [100] YAMIL ARRIZMENDI-SANTANA, a/k/a "El Mono",
- [101] ROBERT D. PEREZ-NUÑEZ, a/k/a "Minino",
- [102] ANTHONY ESPADA-COLON, a/k/a "Oreo/Apu",
- [103] DANIEL DE-JESUS-DIAZ, a/k/a "Paleta",
- [104] LUIS E. ESPADA-COLON, a/k/a "Zona",
- [105] ASTRID J. MARTINEZ-VALENTIN, a/k/a "La Jefa",

the defendants herein, did knowingly and intentionally, combine, conspire, and agree with each other and with diverse other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and intentionally possess with intent to distribute and to distribute controlled substances, to wit: in excess of two hundred and eighty (280) grams of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II Narcotic Drug Controlled Substance; in excess of one (1) kilogram of a mixture or substance containing a detectable amount of heroin, a Schedule I, Narcotic Drug Controlled Substance; in excess of five (5) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance; in excess of one hundred (100) kilograms of a mixture or substance containing a detectable amount of marijuana, a Schedule I, Controlled Substance; within one thousand (1,000) feet of a real property comprising housing facilities owned by a public housing authority, to wit: Jardines del Paraiso Public

Housing Project, Villa Andalucia Public Housing Project, Alturas de Cupey Public Housing Project, Jardines de Cupey Public Housing Project, Brisas de Cupey Public Housing Project, Los Claveles Public Housing Project, Nuestra Señora de Covadonga Public Housing Project, Los Lirios Public Housing Project, Jardines de Monte Hatillo Public Housing Project, Jardines de Campo Rico Public Housing Project, Jardines de Berwind Public Housing Project, San Martin Public Housing Project, Monte Park Public Housing Project, El Polvorin Ward, Villa Lomas Verdes Public Housing Project, Mango Sector and other areas nearby, within the Municipalities of San Juan, Trujillo Alto and Carolina in violation of 21 U.S.C. § 841(a)(1).

All in violation of 21 U.S.C. §§ 846 and 860.

COUNT THREE

(Using and Carrying Firearms During and in Relation to a Drug Trafficking Crime)

Beginning on a date unknown, but no later than in or about the year 2007, and continuing up to and until the return of the instant Indictment, in the Municipalities of San Juan, Carolina and Trujillo Alto, District of Puerto Rico and within the jurisdiction of this Court,

- [1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a “Mayito/Mayo/El Father”,
- [2] PEDRO VIGIO-APONTE, a/k/a “Pedrito/Pedrito He-Man/Pello/Pedrito Trauma”,
- [3] FRANKIE ROSA-CALDERON, a/k/a “Anky/El Negro/Frank”,
- [5] MIGUEL VAZQUEZ-MARTINEZ, a/k/a “Miguelo/Radio/Miclo/BJ”,
- [7] ERNESTO MORALES-CASTRO, a/k/a “Nestor/Los Gorditos”,
- [8] CHRISTIAN MORALES-CASTRO, a/k/a “Bimbo/Los Gorditos”,
- [9] REYFRANK QUIÑONES-CARRION, a/k/a “Pelotero”,
- [10] KELVIN D. MORALES-CINTRON,
- [11] ISMAEL MENDEZ-ARROYO, a/k/a “Bolillo”,
- [14] JOSE L. ORTIZ-AGUIRRE, a/k/a “Cheo/Cheo Cedeño”,
- [15] REINALDO RODRIGUEZ-MARTINEZ, a/k/a “Pitbull”,
- [16] WILLIAM ORTIZ-AGUIRRE, a/k/a “Playa/Play”,
- [17] KIDANNY FIGUEROA-OSORIO, a/k/a “Sony/Sonata”,
- [18] JOSE L. SOTO-RIVERA, a/k/a “Luisito/Scary”,
- [20] VICTOR M. RODRIGUEZ-TORRES, a/k/a “Cuca/Cucaracha/Papotin”,
- [21] RAFAEL ANDINO-OJEDA, a/k/a “Rafa/Rafa Colgate/Boca Chula”,
- [24] EMANUEL ZABALA-PEREZ, a/k/a “Punky/Dalmata”,
- [25] ALEXANDER RIVERA-CARRION, a/k/a “Lechon”,

- [28] ALEXIS CARTAGENA-GERENA, a/k/a "Pollo",
- [30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a "Alex",
- [31] JESUS DE-JESUS-COLON, a/k/a "Romulo",
- [32] JOSE L. MENDEZ-DE-JESUS, a/k/a "Sonso/Nariz",
- [34] EDGAR GONZALEZ-RIVERA, a/k/a "Eggy",
- [36] XAVIER CASTRO-VEGA, a/k/a "Raton",
- [37] CARLOS M. GUERRERO-CASTRO, a/k/a "Carlitos El Negro/Marcel",
- [38] ANALDI TANCO-MORENO, a/k/a "Kimbato",
- [39] ORLANDO J. SANTANA, a/k/a "Fino",
- [40] LUIS F. RODRIGUEZ-MARQUEZ, a/k/a "Cheykin",
- [41] JESUS E. MONTALVAN-DIAZ, a/k/a "Luis Garcia-Diaz/Willy Wonka",
- [42] AMAURY MENDEZ-ROSADO, a/k/a "Boty",
- [43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Bauncer/Jose Boria-Millan",
- [44] FNU LNU, a/k/a "Eziel",
- [45] LUIS MARTINEZ-NIEVES, a/k/a "Raya/Trenza",
- [46] MICHAEL RIVERA-RODRIGUEZ,
- [47] ALVIN A. CABEZAS-CINTRON, a/k/a "Ardilla",
- [48] JAIME M. SEMIDAY-PEREZ,
- [49] KENNY O. PACHECO, a/k/a "Keny/Bolin",
- [50] ROBERTO FUENTES-PACHECO, a/k/a "Junito Parcha",
- [51] ROGER FALU-DIAZ, a/k/a "Gua",
- [52] FELIX A. MALAVE-TORRES, a/k/a "Cholon",
- [53] EDGARDO LUNA-LOPEZ, a/k/a "Piri/Enano",
- [54] JESSY J. MELENDEZ-HERNANDEZ, a/k/a "Koby/El Negro/Lely",
- [55] DENZEL RODRIGUEZ-CARABALLO,
- [56] ABIMAEL CRUZ-RODRIGUEZ, a/k/a "Lindo/Feo/Metra",
- [59] FNU LNU, a/k/a "Gaby",
- [60] JOSE D. RESTO-FIGUEROA, a/k/a "Tego",
- [61] ORLANDO PADILLA-AYALA, a/k/a "Oreo/Willito/Angel M. Santiago-Ayala",
- [62] KERNIS RODRIGUEZ-RIVERA, a/k/a "Sosa",
- [63] WALTER D. MULLER-COLON, a/k/a "Vampy/Bolo",
- [64] WILFREDO RUIZ, a/k/a "Freddy",
- [65] CARLOS E. BRIOSO-COLLANTES, a/k/a "El Barber/Wiso El Barber",
- [66] CARLOS VELAZQUEZ-FONTANEZ,
- [67] JONATHAN FIGUEROA-CATINCHI, a/k/a "Katinchi",
- [69] CHARLIE J. FOURNIER-COLLAZO, a/k/a "Chiry",
- [72] NESTOR R. CONCEPCION-RIVERA, a/k/a "Nesti/Kilate",
- [76] FELIX RODRIGUEZ-RODRIGUEZ, a/k/a "Correa/Baloncelista/El Indio",
- [77] DANIEL O. MARTINEZ-VELEZ, a/k/a "Berto",
- [80] RAMON VICENTY-RIVERA, a/k/a "Poke",
- [84] BRYAN MARTINEZ, a/k/a "Fat Boy",
- [86] JOSE A. FOURNIER-COLLAZO, a/k/a "Semilla",
- [87] KEVIN CASTRO-VEGA,
- [88] JUAN GUADALUPE-DELGADO, a/k/a "Bocao",
- [89] DAVID GARCIA-FRANCO, a/k/a "David Nota",
- [90] GIOVANI JUSTINIANO-DIAZ, a/k/a "Zegueta",

[91] CHRISTIAN VAZQUEZ-HERNÁNDEZ, a/k/a “Chapa”,
[98] VICTOR ALFONSO-JORGE, a/k/a “Nano”,
[99] HECTOR J. CRUZ-VARGAS, a/k/a “Punky”,
[103] DANIEL DE-JESUS-DIAZ, a/k/a “Paleta”,
[104] LUIS E. ESPADA-COLON, a/k/a “Zona”,

the defendants herein, aiding and abetting each other, did knowingly and unlawfully use and carry firearms as that term is defined in 18 U.S.C. § 921(a)(3), during and in relation to a drug trafficking crime as charged in Count Two of the instant Indictment. All in violation of 18 U.S.C. § 924(c)(1)(A).

COUNT FOUR
(Drive By Shooting)

On or about June 25, 2011, in the District of Puerto Rico, and within the jurisdiction of this Court,

[4] LUIS F. ALICEA-COLON, a/k/a “Trenza/ Enano/Luis Trenza”,
[30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a “Alex”,
[33] WILLIAM ZAMBRANA-SIERRA, a/k/a “W/Willito”,
[36] XAVIER CASTRO-VEGA, a/k/a “Raton”,
[43] LUIS YANYORE-PIZARRO, a/k/a “Kimbo/Bauncer/Jose Boria-Millan”,
[66] CARLOS VELAZQUEZ-FONTANEZ,

the defendants herein, aiding and abetting each other, in furtherance of a major drug offense, as charged in Count Two, which count is incorporated by reference herein, and with intent to intimidate, harass, injure, and maim, fired a weapon into a group of two (2) or more persons and, in the course of such conduct, killed EDWIN DIAZ-CRUZ, HERVIN VALCARCEL-MARTINEZ, a/k/a “Prieto”, JAVIER CATALA-BERMUDEZ, and ORLANDO MELENDEZ-VILLEGAS, which killings are murder within the meaning of 18 U.S.C. § 1111(a).

All in violation of 18 U.S.C. §§ 36(b)(2)(A) and 2.

COUNT FIVE

(Use and Carry of a Firearm During and in Relation to a Crime of Violence)

On or about June 25, 2011, in the District of Puerto Rico, and within the jurisdiction of this Court,

- [4] LUIS F. ALICEA-COLON, a/k/a "Trenza/ Enano/Luis Trenza",
- [30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a "Alex",
- [33] WILLIAM ZAMBRANA-SIERRA, a/k/a "W/Willito",
- [36] XAVIER CASTRO-VEGA, a/k/a "Raton",
- [43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Bauncer/Jose Boria-Millan",
- [66] CARLOS VELAZQUEZ-FONTANEZ,

the defendants herein, aiding and abetting each other, did knowingly use and carry a firearm, that is, a firearm with an unknown serial number, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, namely, a violation of 18 U.S.C. § 36(b)(2)(A), as charged in Count Four of the Indictment, and in the course of that crime did cause the death of EDWIN DIAZ-CRUZ, HERVIN VALCARCEL-MARTINEZ, a/k/a "Prieto", JAVIER CATALA-BERMUDEZ, and ORLANDO MELENDEZ-VILLEGAS, through the use of a firearm, which killing is a murder as defined in 18 U.S.C. § 1111.

All in violation of 18 U.S.C. §§ 924(c)(1)(A), 924(j)(1), and 2.

COUNT SIX

(Drive By Shooting)

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

- [1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father",
- [2] PEDRO VIGIO-APONTE, a/k/a "Pedrito/Pedrito He-Man/Pello/Pedrito Trauma",
- [9] REYFRANK QUIÑONES-CARRION, a/k/a "Pelotero",
- [18] JOSE L. SOTO-RIVERA, a/k/a "Luisito/Scary",
- [20] VICTOR M. RODRIGUEZ-TORRES, a/k/a Cuca/Cucaracha/Papotin",
- [24] EMANUEL ZABALA-PEREZ, a/k/a "Punky/Dalmata",
- [30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a "Alex",

[36] XAVIER CASTRO-VEGA, a/k/a "Raton",
[43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Bauncer/Jose Boria-Millan",

the defendants herein, aiding and abetting each other and others known and unknown, in furtherance of a major drug offense, as charged in Count Two, which count is incorporated by reference herein, and with intent to intimidate, harass, injure, and maim, fired a weapon into a group of two (2) or more persons and, in the course of such conduct, killed SANTOS DIAZ-CAMACHO, a/k/a "Joel Bazooka", JUAN ROSARIO-MERCADO, a/k/a "Toñito", and KEVIN SOTO-ROMAN, a/k/a "El Gordo", which killings are murder within the meaning of 18 U.S.C. § 1111(a).

All in violation of 18 U.S.C. § 36(b)(2)(A) and 2.

COUNT SEVEN

(Use and Carry of a Firearm During and in Relation to a Crime of Violence)

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

[1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father",
[2] PEDRO VIGIO-APONTE, a/k/a "Pedrito/Pedrito He-Man/Pello/Pedrito Trauma",
[9] REYFRANK QUIÑONES-CARRION, a/k/a "Pelotero",
[18] JOSE L. SOTO-RIVERA, a/k/a "Luisito/Scary",
[20] VICTOR M. RODRIGUEZ-TORRES, a/k/a Cuca/Cucaracha/Papotin",
[24] EMANUEL ZABALA-PEREZ, a/k/a "Punky/Dalmata",
[30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a "Alex",
[36] XAVIER CASTRO-VEGA, a/k/a "Raton",
[43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Bauncer/Jose Boria-Millan",

the defendants herein, aiding and abetting each other and others known and unknown, did knowingly use and carry a firearm, that is, a firearm with an unknown serial number, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, namely, a violation of 18 U.S.C. § 36(b)(2)(A), as charged in Count Six of the Indictment, and in the course of that crime did cause the death of SANTOS DIAZ-CAMACHO,

a/k/a “Joel Bazooka”, JUAN ROSARIO-MERCADO, a/k/a “Toñito”, and KEVIN SOTO-ROMAN, a/k/a “El Gordo”, through the use of a firearm, which killing is a murder as defined in 18 U.S.C. § 1111.

All in violation of 18 U.S.C. §§ 924(c)(1)(A), 924(j)(1) and 2.

COUNT EIGHT
(Drive By Shooting)

On or about August 28, 2012, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a “Mayito/Mayo/El Father”,
[4] LUIS F. ALICEA-COLON, a/k/a “Trenza/Enano/Luis Trenza”,
[30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a “Alex”,
[37] CARLOS M. GUERRERO-CASTRO, a/k/a “Carlitos El Negro/Marcel”,
[38] ANALDI TANCO-MORENO, a/k/a “Kimbito”,
[58] JOSE E. RIVERA-MALDONADO, a/k/a “Camon”,
[59] FNU LNU, a/k/a “Gaby”,
[60] JOSE D. RESTO-FIGUEROA, a/k/a “Tego”,
[61] ORLANDO PADILLA-AYALA, a/k/a “Oreo/Willito/Angel M. Santiago-Ayala”,

the defendants herein, aiding and abetting each other and others known and unknown, in furtherance of a major drug offense, as charged in Count Two, which count is incorporated by reference herein, and with intent to intimidate, harass, injure, and maim, fired a weapon into a group of two (2) or more persons and, in the course of such conduct, killed LUIS OJEDA-ANDINO, a/k/a “Pollo,” LUIS VELAZQUEZ-AQUINO, a/k/a “Urraca”, and JOSE AYALA-GARCIA, which killings are murder within the meaning of 18 U.S.C. § 1111(a).

All in violation of 18 U.S.C. § 36(b)(2)(A) and 2.

COUNT NINE

(Use and Carry of a Firearm During and in Relation to a Crime of Violence)

On or about August 28, 2012, in the District of Puerto Rico, and within the jurisdiction of this Court,

- [1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father",
- [4] LUIS F. ALICEA-COLON, a/k/a "Trenza/Enano/Luis Trenza",
- [30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a "Alex",
- [37] CARLOS M. GUERRERO-CASTRO, a/k/a "Carlitos El Negro/Marcel",
- [38] ANALDI TANCO-MORENO, a/k/a "Kimbito",
- [58] JOSE E. RIVERA-MALDONADO, a/k/a "Camon",
- [59] FNU LNU, a/k/a "Gaby",
- [60] JOSE D. RESTO-FIGUEROA, a/k/a "Tego",
- [61] ORLANDO PADILLA-AYALA, a/k/a "Oreo/Willito/Angel M. Santiago-Ayala",

the defendants herein, aiding and abetting each other and others known and unknown, did knowingly use and carry a firearm, that is, a firearm with an unknown serial number, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, namely, a violation of 18 U.S.C. § 36(b)(2)(A), as charged in Count Eight of the Indictment, and in the course of that crime did cause the death of LUIS OJEDA-ANDINO, a/k/a "Pollo," LUIS VELAZQUEZ-AQUINO, a/k/a "Urraca", and JOSE AYALA-GARCIA, through the use of a firearm, which killing is a murder as defined in 18 U.S.C. § 1111.

All in violation of 18 U.S.C. §§ 924(c)(1)(A), 924(j)(1) and 2.

NOTICE OF SPECIAL FINDINGS

[1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/Father"

- I. **Counts Six and Seven:** Murder of JUAN ROSARIO-MERCADO, a/k/a "Toñito", KEVIN SOTO-ROMAN, a/k/a "El Gordo", and SANTOS DIAZ-CAMACHO, a/k/a "Joel Bazooka" on July 20, 2011

1. Counts Six and Seven of this Indictment are hereby realleged and adopted by reference.

2. It is further alleged that:

- a. The defendant was eighteen (18) years of age or older at the time of the offenses.
See 18 U.S.C. § 3591(a).
- b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).
- c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).
- d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).
- e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(D).
- f. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense; knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).
- g. The defendant committed the offenses after substantial planning and premeditation to cause the death of a person. See 18 U.S.C. § 3592(c)(9).
- h. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

II. Counts Eight and Nine: Murder of LUIS OJEDA-ANDINO, a/k/a “Pollo,” LUIS VELAZQUEZ-AQUINO, a/k/a “Urraca”, and JOSE AYALA-GARCIA on August 28, 2012

1. Counts Eight and Nine of this Indictment are hereby realleged and adopted by reference.
2. It is further alleged that:
 - a. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).
 - b. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).

[2] PEDRO VIGIO-APONTE, a/k/a “Pedrito/Pedrito He-Man/Pello/Pedrito Trauma”

I. Counts Six and Seven: Murder of JUAN ROSARIO-MERCADO, a/k/a “Toñito”, KEVIN SOTO-ROMAN, a/k/a “El Gordo”, and SANTOS DIAZ-CAMACHO, a/k/a “Joel Bazooka” on July 20, 2011

1. Counts Six and Seven of this Indictment are hereby realleged and adopted by reference.
2. It is further alleged that:
 - a. The defendant was eighteen (18) years of age or older at the time of the offenses. See 18 U.S.C. § 3591(a).
 - b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).
 - c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).

- d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).
- e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(D).
- f. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).
- g. The defendant committed the offenses after substantial planning and premeditation to cause the death of a person. See 18 U.S.C. § 3592(c)(9).
- h. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

[4] LUIS F. ALICEA-COLON, a/k/a “Trenza/Enano/Luis Trenza”

I. Counts Four and Five: Murder of EDWIN DIAZ-CRUZ, HERVIN VALCARCEL-MARTINEZ, a/k/a “Prieto”, JAVIER CATALA-BERMUDEZ, and ORLANDO MELENDEZ-VILLEGAS on June 25, 2011

- 1. Counts Four and Five of this Indictment are hereby realleged and adopted by reference.
- 2. It is further alleged that:

- a. The defendant was eighteen (18) years of age or older at the time of the offenses. See 18 U.S.C. § 3591(a).
- b. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).
- c. The defendant has previously been convicted of a Federal or State offense punishable by a term of imprisonment of more than one year, involving the use or attempted or threatened use of a firearm (as defined in section 921) against another person. See 18 U.S.C. § 3592(c)(2).

II. Counts Eight and Nine: Murder of LUIS OJEDA-ANDINO, a/k/a “Pollo,” LUIS VELAZQUEZ-AQUINO, a/k/a “Urraca”, and JOSE AYALA-GARCIA on August 28, 2012

1. Counts Eight and Nine of this Indictment are hereby realleged and adopted by reference.
2. It is further alleged that:
 - a. The defendant was eighteen (18) years of age or older at the time of the offenses. See 18 U.S.C. § 3591(a).
 - b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).
 - c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).
 - d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection

with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).

- e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(D).
- f. The defendant has previously been convicted of a Federal or State offense punishable by a term of imprisonment of more than one year, involving the use or attempted or threatened use of a firearm (as defined in section 921) against another person. See 18 U.S.C. § 3592(c)(2).
- g. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).
- h. The defendant procured the commission of the offense by payment, or promise of payment, of anything of pecuniary value. See 18 U.S.C. § 3592(c)(7).
- i. The defendant committed the offenses after substantial planning and premeditation to cause the death of a person. See 18 U.S.C. § 3592(c)(9).
- j. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

[9] REYFRANK QUINONES-CARRION, a/k/a "Pelotero"

I. **Counts Six and Seven:** Murder of JUAN ROSARIO-MERCADO, a/k/a "Toñito", KEVIN SOTO-ROMAN, a/k/a "El Gordo", and SANTOS DIAZ-CAMACHO, a/k/a "Joel Bazooka" on July 20, 2011

1. Counts Six and Seven of this Indictment are hereby realleged and adopted by reference.
2. It is further alleged that:
 - a. The defendant was eighteen (18) years of age or older at the time of the offenses. See 18 U.S.C. § 3591(a).
 - b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).
 - c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).
 - d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).
 - e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(D).
 - f. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).

- g. The defendant committed the offenses after substantial planning and premeditation to cause the death of a person. See 18 U.S.C. § 3592(c)(9).
- h. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

[18] JOSE L. SOTO-RIVERA, a/k/a “Luisito/Scary”

I. Counts Six and Seven: Murder of JUAN ROSARIO-MERCADO, a/k/a “Toñito”, KEVIN SOTO-ROMAN, a/k/a “El Gordo”, and SANTOS DIAZ-CAMACHO, a/k/a “Joel Bazooka” on July 20, 2011

- 1. Counts Six and Seven of this Indictment are hereby realleged and adopted by reference.
- 2. It is further alleged that:
 - a. The defendant was eighteen (18) years of age or older at the time of the offenses. See 18 U.S.C. § 3591(a).
 - b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).
 - c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).
 - d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).
 - e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a

reckless disregard for human life and the victim, died as a direct result of the act.
See 18 U.S.C. § 3591(a)(2)(D).

- f. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).
- g. The defendant committed the offenses after substantial planning and premeditation to cause the death of a person. See 18 U.S.C. § 3592(c)(9).
- h. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

[20] VICTOR M. RODRIGUEZ-TORRES, a/k/a “Cuca/Cucaracha/Papotin”

I. Counts Six and Seven: Murder of JUAN ROSARIO-MERCADO, a/k/a “Toñito”, KEVIN SOTO-ROMAN, a/k/a “El Gordo”, and SANTOS DIAZ-CAMACHO, a/k/a “Joel Bazooka” on July 20, 2011

- 1. Counts Six and Seven of this Indictment are hereby realleged and adopted by reference.
- 2. It is further alleged that:
 - a. The defendant was eighteen (18) years of age or older at the time of the offenses.
See 18 U.S.C. § 3591(a).
 - b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).
 - c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).
 - d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection

with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).

- e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(D).
- f. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).
- g. The defendant committed the offenses after substantial planning and premeditation to cause the death of a person. See 18 U.S.C. § 3592(c)(9).
- h. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

[24] EMANUEL ZABALA-PEREZ, a/k/a “Punky/Dalmata”

I. Counts Six and Seven: Murder of JUAN ROSARIO-MERCADO, a/k/a “Tofito”, KEVIN SOTO-ROMAN, a/k/a “El Gordo”, and SANTOS DIAZ-CAMACHO, a/k/a “Joel Bazooka” on July 20, 2011

- 1. Counts Six and Seven of this Indictment are hereby realleged and adopted by reference.
- 2. It is further alleged that:
 - a. The defendant was eighteen (18) years of age or older at the time of the offenses. See 18 U.S.C. § 3591(a).
 - b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).

- c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).
- d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).
- e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(D).
- f. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).
- g. The defendant committed the offenses after substantial planning and premeditation to cause the death of a person. See 18 U.S.C. § 3592(c)(9).
- h. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

[33] WILLIAM ZAMBRANA-SIERRA, a/k/a “W/Willito”

I. Counts Four and Five: Murder of EDWIN DIAZ-CRUZ, HERVIN VALCARCEL-MARTINEZ, a/k/a “Prieto”, JAVIER CATALA-BERMUDEZ, and ORLANDO MELENDEZ-VILLEGAS on June 25, 2011

- 1. Counts Four and Five of this Indictment are hereby realleged and adopted by reference.

2. It is further alleged that:

- a. The defendant was eighteen (18) years of age or older at the time of the offenses.
See 18 U.S.C. § 3591(a).
- b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).
- c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).
- d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).
- e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(D).
- f. The defendant has previously been convicted of a Federal or State offense punishable by a term of imprisonment of more than one year, involving the use or attempted or threatened use of a firearm (as defined in section 921) against another person. See 18 U.S.C. § 3592(c)(2).
- g. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

[36] XAVIER CASTRO-VEGA, a/k/a “Raton”

I. **Counts Four and Five:** Murder of EDWIN DIAZ-CRUZ, HERVIN VALCARCEL-MARTINEZ, a/k/a “Prieto”, JAVIER CATALA-BERMUDEZ, and ORLANDO MELENDEZ-VILLEGAS on June 25, 2011

1. Counts Four and Five of this Indictment are hereby realleged and adopted by reference.
2. It is further alleged that:
 - a. The defendant was eighteen (18) years of age or older at the time of the offenses.
See 18 U.S.C. § 3591(a).
 - b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).
 - c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).
 - d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).
 - e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and the victim, died as a direct result of the act.
See 18 U.S.C. § 3591(a)(2)(D).
 - f. The defendant has previously been convicted of a Federal or State offense punishable by a term of imprisonment of more than one year, involving the use or

attempted or threatened use of a firearm (as defined in section 921) against another person. See 18 U.S.C. § 3592(c)(2).

g. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

II. Counts Six and Seven: Murder of JUAN ROSARIO-MERCADO, a/k/a “Toñito”, KEVIN SOTO-ROMAN, a/k/a “El Gordo”, and SANTOS DIAZ-CAMACHO, a/k/a “Joel Bazooka” on July 20, 2011

1. Counts Six and Seven of this Indictment are hereby realleged and adopted by reference.

2. It is further alleged that:

a. The defendant was eighteen (18) years of age or older at the time of the offenses.

See 18 U.S.C. § 3591(a).

b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).

c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).

d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).

e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(D).

- f. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).
- g. The defendant committed the offenses after substantial planning and premeditation to cause the death of a person. See 18 U.S.C. § 3592(c)(9).
- h. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

[37] CARLOS M. GUERRERO-CASTRO, a/k/a “Carlitos El Negro/Marcel”

I. Counts Eight and Nine: Murder of LUIS OJEDA-ANDINO, a/k/a “Pollo,” LUIS VELAZQUEZ-AQUINO, a/k/a “Urraca”, and JOSE AYALA-GARCIA on August 28, 2012

- 1. Counts Eight and Nine of this Indictment are hereby realleged and adopted by reference.
- 2. It is further alleged that:
 - a. The defendant was eighteen (18) years of age or older at the time of the offenses. See 18 U.S.C. § 3591(a).
 - b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).
 - c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).
 - d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).

- e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(D).
- f. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).
- g. The defendant procured the commission of the offense by payment, or promise of payment, of anything of pecuniary value. See 18 U.S.C. § 3592(c)(7).
- h. The defendant committed the offenses after substantial planning and premeditation to cause the death of a person. See 18 U.S.C. § 3592(c)(9).
- i. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

[38] ANALDI TANCO-MORENO, a/k/a “Kimbato”

I. Counts Eight and Nine: Murder of LUIS OJEDA-ANDINO, a/k/a “Pollo,” LUIS VELAZQUEZ-AQUINO, a/k/a “Urraca”, and JOSE AYALA-GARCIA on August 28, 2012

- 1. Counts Eight and Nine of this Indictment are hereby realleged and adopted by reference.
- 2. It is further alleged that:
 - a. The defendant was eighteen (18) years of age or older at the time of the offenses. See 18 U.S.C. § 3591(a).
 - b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).

- c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).
- d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).
- e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(D).
- f. The defendant has previously been convicted of a Federal or State offense punishable by a term of imprisonment of more than one year, involving the use or attempted or threatened use of a firearm (as defined in section 921) against another person. See 18 U.S.C. § 3592(c)(2).
- g. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).
- h. The defendant procured the commission of the offense by payment, or promise of payment, of anything of pecuniary value. See 18 U.S.C. § 3592(c)(7).
- i. The defendant committed the offenses after substantial planning and premeditation to cause the death of a person. See 18 U.S.C. § 3592(c)(9).

- j. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

[58] JOSE E. RIVERA-MALDONADO, a/k/a “Camon”

I. Counts Eight and Nine: Murder of LUIS OJEDA-ANDINO, a/k/a “Pollo,” LUIS VELAZQUEZ-AQUINO, a/k/a “Urraca”, and JOSE AYALA-GARCIA on August 28, 2012

1. Counts Eight and Nine of this Indictment are hereby realleged and adopted by reference.
2. It is further alleged that:
 - a. The defendant was eighteen (18) years of age or older at the time of the offenses. See 18 U.S.C. § 3591(a).
 - b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).
 - c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).
 - d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).
 - e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(D).

- f. The defendant has previously been convicted of a Federal or State offense punishable by a term of imprisonment of more than one year, involving the use or attempted or threatened use of a firearm (as defined in section 921) against another person. See 18 U.S.C. § 3592(c)(2).
- g. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).
- h. The defendant procured the commission of the offense by payment, or promise of payment, of anything of pecuniary value. See 18 U.S.C. § 3592(c)(7).
- i. The defendant committed the offenses after substantial planning and premeditation to cause the death of a person. See 18 U.S.C. § 3592(c)(9).
- j. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

[59] FNU LNU, a/k/a “Gaby”

I. Counts Eight and Nine: Murder of LUIS OJEDA-ANDINO, a/k/a “Pollo,” LUIS VELAZQUEZ-AQUINO, a/k/a “Urraca”, and JOSE AYALA-GARCIA on August 28, 2012

- 1. Counts Eight and Nine of this Indictment are hereby realleged and adopted by reference.
- 2. It is further alleged that:
 - a. The defendant was eighteen (18) years of age or older at the time of the offenses. See 18 U.S.C. § 3591(a).
 - b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).

- c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).
- d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).
- e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(D).
- f. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).
- g. The defendant procured the commission of the offense by payment, or promise of payment, of anything of pecuniary value. See 18 U.S.C. § 3592(c)(7).
- h. The defendant committed the offenses after substantial planning and premeditation to cause the death of a person. See 18 U.S.C. § 3592(c)(9).
- i. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

[60] JOSE D. RESTO-FIGUEROA, a/k/a "Tego"

I. **Counts Eight and Nine:** Murder of LUIS OJEDA-ANDINO, a/k/a "Pollo," LUIS VELAZQUEZ-AQUINO, a/k/a "Urraca", and JOSE AYALA-GARCIA on August 28, 2012

1. Counts Eight and Nine of this Indictment are hereby realleged and adopted by reference.
2. It is further alleged that:
 - a. The defendant was eighteen (18) years of age or older at the time of the offenses. See 18 U.S.C. § 3591(a).
 - b. The defendant intentionally killed the victim. See 18 U.S.C. § 3591(a)(2)(A).
 - c. The defendant intentionally inflicted serious bodily injury that resulted in the death of the victim. See 18 U.S.C. § 3591(a)(2)(B).
 - d. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).
 - e. The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(D).
 - f. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).

- g. The defendant procured the commission of the offense by payment, or promise of payment, of anything of pecuniary value. See 18 U.S.C. § 3592(c)(7).
- h. The defendant committed the offenses after substantial planning and premeditation to cause the death of a person. See 18 U.S.C. § 3592(c)(9).
- i. The defendant intentionally killed or attempted to kill more than one person in a single criminal episode. See 18 U.S.C. § 3592(c)(16).

[61] ORLANDO PADILLA-AYALA, a/k/a “Oreo/Willito/Angel M. Santiago-Ayala”

I. Counts Eight and Nine: Murder of LUIS OJEDA-ANDINO, a/k/a “Pollo,” LUIS VELAZQUEZ-AQUINO, a/k/a “Urraca”, and JOSE AYALA-GARCIA on August 28, 2012

- 1. Counts Eight and Nine of this Indictment are hereby realleged and adopted by reference.
- 2. It is further alleged that:
 - a. The defendant was eighteen (18) years of age or older at the time of the offenses. See 18 U.S.C. § 3591(a).
 - b. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).
 - c. The defendant, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. See 18 U.S.C. § 3592(c)(5).
 - d. The defendant committed the offenses after substantial planning and premeditation to cause the death of a person. See 18 U.S.C. § 3592(c)(9).

[66] CARLOS VELAZQUEZ-FONTANEZ

I. **Counts Four and Five:** Murder of EDWIN DIAZ-CRUZ, HERVIN VALCARCEL-MARTINEZ, a/k/a “Prieto”, JAVIER CATALA-BERMUDEZ, and ORLANDO MELENDEZ-VILLEGAS on June 25, 2011

1. Counts Four and Five of this Indictment are hereby realleged and adopted by reference.
2. It is further alleged that:
 - a. The defendant was eighteen (18) years of age or older at the time of the offenses.
See 18 U.S.C. § 3591(a).
 - b. The defendant intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim, died as a direct result of the act. See 18 U.S.C. § 3591(a)(2)(C).

RICO FORFEITURE

The allegations contained in Count One of this Indictment are hereby repeated, realleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 1963 and 28 U.S.C. § 2461(c). Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 1963 in the event of any defendant’s conviction under Count One of this Indictment.

The defendants,

- [1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a “Mayito/Mayo/El Father”,
- [2] PEDRO VIGIO-APONTE a/k/a “Pedrito/Pedrito He-Man/Pello/Pedrito Trauma”,
- [3] FRANKIE ROSA-CALDERON a/k/a “Anky/El Negro/Frank”,
- [4] LUIS F. ALICEA-COLON, a/k/a “Trenza/Enano/Luis Trenza”,

- [5] MIGUEL VAZQUEZ-MARTINEZ, a/k/a "Miguelo/Radio/Miclo/BJ",
- [6] RUBEN COTTO-ANDINO, a/k/a "Ruben El Negro",
- [7] ERNESTO MORALES-CASTRO, a/k/a "Nestor/Los Gorditos",
- [8] CHRISTIAN MORALES-CASTRO, a/k/a "Bimbo/Los Gorditos",
- [9] REYFRANK QUIÑONES-CARRION, a/k/a "Pelotero",
- [10] KELVIN D. MORALES-CINTRON,
- [11] ISMAEL MENDEZ-ARROYO, a/k/a "Bolillo",
- [12] MICHAEL MUÑIZ-SANCHEZ,
- [13] JONATHAN PEREZ-RODRIGUEZ, a/k/a "Perra/Perreke",
- [14] JOSE L. ORTIZ-AGUIRRE, a/k/a "Cheo/Cheo Cedeño",
- [15] REINALDO RODRIGUEZ-MARTINEZ, a/k/a "Pitbull",
- [16] WILLIAM ORTIZ-AGUIRRE, a/k/a "Playa/Play",
- [17] KIDANNY FIGUEROA-OSORIO, a/k/a "Sony/Sonata",
- [18] JOSE L. SOTO-RIVERA, a/k/a "Luisito/Scary",
- [19] JOSE E. MOJICA-ROBLES, a/k/a "Papito Mojica",
- [20] VICTOR M. RODRIGUEZ-TORRES, a/k/a "Cuca/Cucaracha/Papotin",
- [21] RAFAEL ANDINO-OJEDA, a/k/a "Rafa/Rafa Colgate/Boca Chula",
- [22] MYLES J. ROMAN-ADORNO,
- [23] GUILLERMO SANCHEZ-MORA, a/k/a "Guillo",
- [24] EMANUEL ZABALA-PEREZ, a/k/a "Punky/Dalmata",
- [25] ALEXANDER RIVERA-CARRION, a/k/a "Lechon",
- [26] DAVID E. RODRIGUEZ-CASTRO,
- [27] RAFAEL HIRALDO-ALEJANDRO, a/k/a "Bolillo",
- [28] ALEXIS CARTAGENA-GERENA, a/k/a "Pollo",
- [29] ANGEL L. SOTO-RAMOS, a/k/a "Huesito",
- [30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a "Alex",
- [31] JESUS DE-JESUS-COLON, a/k/a "Romulo",
- [32] JOSE L. MENDEZ-DE-JESUS, a/k/a "Sonso/Nariz",
- [33] WILLIAM ZAMBRANA-SIERRA, a/k/a "W/Willito",
- [34] EDGAR GONZALEZ-RIVERA, a/k/a "Eggy",
- [35] ARNALDO ALICEA-COLON, a/k/a "Naldito",
- [36] XAVIER CASTRO-VEGA, a/k/a "Raton",
- [37] CARLOS M. GUERRERO-CASTRO, a/k/a "Carlitos El Negro/Marcel",
- [38] ANALDI TANCO-MORENO, a/k/a "Kimbato",
- [39] ORLANDO J. SANTANA, a/k/a "Fino",
- [40] LUIS F. RODRIGUEZ-MARQUEZ, a/k/a "Cheykin",
- [41] JESUS E. MONTALVAN-DIAZ, a/k/a "Luis Garcia-Diaz/Willy Wonka",
- [42] AMAURY MENDEZ-ROSADO, a/k/a "Boty",
- [43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Baucer/Jose Boria-Millan",
- [44] FNU LNU, a/k/a "Eziel",
- [45] LUIS MARTINEZ-NIEVES, a/k/a "Raya/Trenza",
- [46] MICHAEL RIVERA-RODRIGUEZ,
- [47] ALVIN A. CABEZAS-CINTRON, a/k/a "Ardilla",
- [48] JAIME M. SEMIDAY-PEREZ,
- [49] KENNY O. PACHECO, a/k/a "Keny/Bolin",
- [50] ROBERTO FUENTES-PACHECO, a/k/a "Junito Parcha",

- [51] ROGER FALU-DIAZ, a/k/a "Gua",
- [52] FELIX A. MALAVE-TORRES, a/k/a "Cholon",
- [53] EDGARDO LUNA-LOPEZ, a/k/a "Piri/Enano",
- [54] JESSY J. MELENDEZ-HERNANDEZ, a/k/a "Koby/El Negro/Lely",
- [55] DENZEL RODRIGUEZ-CARABALLO,
- [56] ABIMAEI CRUZ-RODRIGUEZ, a/k/a "Lindo/Feo/Metra",
- [57] ANGEL L. COTTO-NEGRON, a/k/a "Quija/Kija",
- [58] JOSE E. RIVERA-MALDONADO, a/k/a "Camon",
- [59] FNU LNU, a/k/a "Gaby",
- [60] JOSE D. RESTO-FIGUEROA, a/k/a "Tego",
- [61] ORLANDO PADILLA-AYALA, a/k/a "Oreo/Willito/Angel M. Santiago-Ayala",
- [62] KERNIS RODRIGUEZ-RIVERA, a/k/a "Sosa",
- [63] WALTER D. MULLER-COLON, a/k/a "Vampy/Bolo",
- [64] WILFREDO RUIZ, a/k/a "Freddy",
- [65] CARLOS E. BRIOSO-COLLANTES, a/k/a "El Barber/Wiso El Barber",
- [66] CARLOS VELAZQUEZ-FONTANEZ, a/k/a "Pirin",
- [67] JONATHAN FIGUEROA-CATINCHI, a/k/a "Katinchi",
- [68] IRAM I. SANTANDER-ZULUETA, a/k/a "Cubano",
- [69] CHARLIE J. FOURNIER-COLLAZO, a/k/a "Chiry",
- [70] EDGARDO R. RUANO-CHEVERE, a/k/a "Masacre/Masa",
- [71] FRANCISCO J. GONZALEZ-CAMACHO, a/k/a "Lento",
- [72] NESTOR R. CONCEPCION-RIVERA, a/k/a "Nesti/Kilate",
- [73] IVETTE VAZQUEZ-DROZ, a/k/a "Ive/Precious Moments",
- [74] BILLY VILLANUEVA-CARRASQUILLO, a/k/a "Meca/Billy Meca",
- [75] JAYFRANK QUIÑONES-CARRION,
- [76] FELIX RODRIGUEZ-RODRIGUEZ, a/k/a "Correa/Balancelista/El Indio",
- [77] DANIEL O. MARTINEZ-VELEZ, a/k/a "Berto",
- [78] LUIS F. DIAZ-TINEO, a/k/a "Pipen/Pipe",
- [79] JOSUE O. FIGUEROA-RODRIGUEZ, a/k/a "Gordo Puta",
- [80] RAMON VICENTY-RIVERA, a/k/a "Poke",
- [81] LUIS E. GUADALUPE-CAMACHO, a/k/a "Yaya/Yayi/Ardilla",
- [82] JULIO N. MATOS-SANCHEZ, a/k/a "Julio Marañña",
- [83] REYNALDO GONZALEZ-ZAYAS, a/k/a "Cuto",
- [84] BRYAN MARTINEZ, a/k/a "Fat Boy",
- [85] DAMIAN FERNANDEZ-JORGE,
- [86] JOSE A. FOURNIER-COLLAZO, a/k/a "Semilla",
- [87] KEVIN CASTRO-VEGA,
- [88] JUAN GUADALUPE-DELGADO, a/k/a "Bocao",
- [89] DAVID GARCIA-FRANCO, a/k/a "David Nota",
- [90] GIOVANI JUSTINIANO-DIAZ, a/k/a "Zegueta",
- [91] CHRISTIAN VAZQUEZ-HERNANDEZ, a/k/a "Chapa",
- [92] JAMES STEELE-TORRES, a/k/a "Negro Steele",
- [93] NILDA SANTIAGO-ESPINOSA, a/k/a "Katy/Kathy",
- [94] ALEX SANTIAGO-CRESPO, a/k/a "Papo Swing/Ale",
- [95] FRANCISCO VARGAS-SANCHEZ, a/k/a "Maraña",
- [96] CARLOS MIRANDA, a/k/a "Eo",

[97] RAMON ANDINO-PEGUERO, a/k/a "Mono",
[98] VICTOR ALFONSO-JORGE, a/k/a "Nano",
[99] HECTOR J. CRUZ-VARGAS, a/k/a "Punky",
[100] YAMIL ARRIZMENDI-SANTANA, a/k/a "El Mono",
[101] ROBERT D. PEREZ-NUÑEZ, a/k/a "Minino",
[102] ANTHONY ESPADA-COLON, a/k/a "Oreo/Apu",
[103] DANIEL DE-JESUS-DIAZ, a/k/a "Paleta",
[104] LUIS E. ESPADA-COLON, a/k/a "Zona",
[105] ASTRID J. MARTINEZ-VALENTIN, a/k/a "La Jefa",

1. have acquired and maintained interests in violation of 18 U.S.C. § 1962, which interests are subject to forfeiture to the United States pursuant to 18 U.S.C. § 1963(a)(1);
2. have an interest in, security of, claims against, and property and contractual rights which afford a source of influence over, the enterprise named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of 18 U.S.C. § 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to 18 U.S.C. § 1963(a)(2);
3. have property constituting and derived from proceeds obtained, directly and indirectly, from racketeering activity, in violation of 18 U.S.C. § 1962, which property is subject to forfeiture to the United States pursuant to 18 U.S.C. § 1963(a)(3).

The interests of the defendants subject to forfeiture to the United States pursuant to 18 U.S.C. § 1963(a)(1), (a)(2), and (3), include but are not limited to:

1. at least \$82,000,000;
2. one (1) Type: Pistol, Make: Taurus, Caliber: 9mm, Serial Number: TOD72701, one (1) Type: Pistol, Make: Smith & Wesson, Model: SW9VE, Caliber: 9mm, Serial Number: PBF6590, one (1) Rifle, Caliber: .22, Make: Rugger, Model: 1022, Serial Number: 114-98271, one (1) Type: Pistol, Make: Glock, Model: 32, Caliber: .357, Serial Number: obliterated, one (1) Type: Pistol, Make: Glock, Model: 21, Caliber: .45, Serial Number:

FHB-741, one (1) Type: Pistol, Make: FNH, Model: Five Seven Semie, Caliber: 5.7 x 28, Serial Number: 38G124564, and one (1) Rifle, Caliber: 7.62 x 39, Serial Number: AD028382, one (1) Type: Pistol, Make: Taurus, Model: PT9ZAF, Caliber: 9mm, Serial Number: TYF95500, one (1) Type: Pistol, Make: Glock, Model: 20, Caliber: .357, Serial Number: GKV-411, one (1) Type: Pistol, Make: Glock, Model: 23, Caliber: .40, Serial Number: KMR-688, one (1) Type: Pistol, Make: Smith & Wesson, Model: 5906, Caliber: 9mm, Serial Number: TCL5650, one (1) Type: Revolver, Make: Magnum, Caliber: .357, Model: 65-3, Serial Number: AEY0037, one (1) Type: Revolver, Make: Colt, Model: Magnum, Caliber: .357, Serial Number: L-73556, one (1) Type: Pistol, Make: Smith & Wesson, Model: 5906, Caliber: 9mm, Serial Number: TYN3286, one (1) Type: Pistol, Make: S&W, Model: 6906, Caliber: 9mm, Serial Number: VAN0235, one (1) Type: Pistol, Make: Glock, Model: 23, Caliber: .40, Serial Number: AUS819, one (1) Type: Pistol, Make: Smith & Wesson, Model: MP, Caliber: .40, one (1) Type: Pistol, Make: Glock, Model: 23, Caliber: .40, Serial Number: EAW185, one (1) Type: Pistol, Make: Glock, Model: 22, Caliber: .40, Serial Number: RFD072, one (1) Type: Pistol, Make: Glock, Model: 22, Caliber: .40, Serial Number: ERZ359, one (1) Type: Pistol, Make: S&W, Model: MP, Caliber: .40, Serial Number: MPB2756, one (1) Type: Pistol, Make: Glock, Model: 22, Caliber: .40, Serial Number: EHC046, one (1) Rifle, Caliber: 7.62 x 39, Model: WASR-10, Serial Number: 1-70605-4, one (1) Rifle, Caliber: .223, Serial Number: 052220, one (1) Type: Pistol, Make: Glock, Model: 27, Caliber: .40, Serial Number: RUC484, one (1) Type: Pistol, Make: Glock, Model: 32a, Caliber: .357, Serial Number: LKP505, one (1) Rifle, Caliber: 5.56, Make: Colt, Serial Number: obliterated, one (1) Type: Pistol, Make: Glock, Model: 22, Caliber: .40, Serial Number: ACY-867,

one (1) Type: Revolver, Make: Ruger, Model: Speed-Six, Caliber: .357, Serial Number: 158-14081, one (1) Rifle, Caliber: 7.62 x 39, Make: Draco Romarm/Cugir, Serial Number: DC-7805-11 RO, one (1) Rifle, Caliber: 7.62 x 39, Model: GP WASR-10-63, Make: ROMARM, Serial Number: 1973 ET 0988, one (1) Type: Revolver, Make: Colt, Model: Detective Special, Caliber: .38, Serial Number: 44539 and ammunition.

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

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

the court shall order the forfeiture of any other property of the defendants up to the value of any property set forth above.

The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to 18 U.S.C. § 1963.

NARCOTICS FORFEITURE ALLEGATION

The allegations contained in Count Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853. Upon conviction of the offense in violation of 21 U.S.C. § 846, set forth in Count Two of this Indictment, the defendants,

- [1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father",
- [2] PEDRO VIGIO-APONTE a/k/a "Pedrito/Pedrito He-Man/Pello/Pedrito Trauma",

- [3] FRANKIE ROSA-CALDERON a/k/a "Anky/El Negro/Frank",
- [4] LUIS F. ALICEA-COLON, a/k/a "Trenza/Enano/Luis Trenza",
- [5] MIGUEL VAZQUEZ-MARTINEZ, a/k/a "Miguelo/Radio/Miclo/BJ",
- [6] RUBEN COTTO-ANDINO, a/k/a "Ruben El Negro",
- [7] ERNESTO MORALES-CASTRO, a/k/a "Nestor/Los Gorditos",
- [8] CHRISTIAN MORALES-CASTRO, a/k/a "Bimbo/Los Gorditos",
- [9] REYFRANK QUIÑONES-CARRION, a/k/a "Pelotero",
- [10] KELVIN D. MORALES-CINTRON,
- [11] ISMAEL MENDEZ-ARROYO, a/k/a "Bolillo",
- [12] MICHAEL MUÑIZ-SANCHEZ,
- [13] JONATHAN PEREZ-RODRIGUEZ, a/k/a "Perra/Perreke",
- [14] JOSE L. ORTIZ-AGUIRRE, a/k/a "Cheo/Cheo Cedeño",
- [15] REINALDO RODRIGUEZ-MARTINEZ, a/k/a "Pitbull",
- [16] WILLIAM ORTIZ-AGUIRRE, a/k/a "Playa/Play",
- [17] KIDANNY FIGUEROA-OSORIO, a/k/a "Sony/Sonata",
- [18] JOSE L. SOTO-RIVERA, a/k/a "Luisito/Scary",
- [19] JOSE E. MOJICA-ROBLES, a/k/a "Papito Mojica",
- [20] VICTOR M. RODRIGUEZ-TORRES, a/k/a "Cuca/Cucaracha/Papotin",
- [21] RAFAEL ANDINO-OJEDA, a/k/a "Rafa/Rafa Colgate/Boca Chula",
- [22] MYLES J. ROMAN-ADORNO,
- [23] GUILLERMO SANCHEZ-MORA, a/k/a "Guillo",
- [24] EMANUEL ZABALA-PEREZ, a/k/a "Punky/Dalmata",
- [25] ALEXANDER RIVERA-CARRION, a/k/a "Lechon",
- [26] DAVID E. RODRIGUEZ-CASTRO,
- [27] RAFAEL HIRALDO-ALEJANDRO, a/k/a "Bolillo",
- [28] ALEXIS CARTAGENA-GERENA, a/k/a "Pollo",
- [29] ANGEL L. SOTO-RAMOS, a/k/a "Huesito",
- [30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a "Alex",
- [31] JESUS DE-JESUS-COLON, a/k/a "Romulo",
- [32] JOSE L. MENDEZ-DE-JESUS, a/k/a "Sonso/Nariz",
- [33] WILLIAM ZAMBRANA-SIERRA, a/k/a "W/Willito",
- [34] EDGAR GONZALEZ-RIVERA, a/k/a "Eggy",
- [35] ARNALDO ALICEA-COLON, a/k/a "Naldito",
- [36] XAVIER CASTRO-VEGA, a/k/a "Raton",
- [37] CARLOS M. GUERRERO-CASTRO, a/k/a "Carlitos El Negro/Marcel",
- [38] ANALDI TANCO-MORENO, a/k/a "Kimbite",
- [39] ORLANDO J. SANTANA, a/k/a "Fino",
- [40] LUIS F. RODRIGUEZ-MARQUEZ, a/k/a "Cheykin",
- [41] JESUS E. MONTALVAN-DIAZ, a/k/a "Luis Garcia-Diaz/Willy Wonka",
- [42] AMAURY MENDEZ-ROSADO, a/k/a "Boty",
- [43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Bauncer/Jose Boria-Millan",
- [44] FNU LNU, a/k/a "Eziel",
- [45] LUIS MARTINEZ-NIEVES, a/k/a "Raya/Trenza",
- [46] MICHAEL RIVERA-RODRIGUEZ,
- [47] ALVIN A. CABEZAS-CINTRON, a/k/a "Ardilla",
- [48] JAIME M. SEMIDAY-PEREZ,

- [49] KENNY O. PACHECO, a/k/a "Keny/Bolin",
- [50] ROBERTO FUENTES-PACHECO, a/k/a "Junito Parcha",
- [51] ROGER FALU-DIAZ, a/k/a "Gua",
- [52] FELIX A. MALAVE-TORRES, a/k/a "Cholon",
- [53] EDGARDO LUNA-LOPEZ, a/k/a "Piri/Enano",
- [54] JESSY J. MELENDEZ-HERNANDEZ, a/k/a "Koby/El Negro/Lely",
- [55] DENZEL RODRIGUEZ-CARABALLO,
- [56] ABIMAEEL CRUZ-RODRIGUEZ, a/k/a "Lindo/Feo/Metra",
- [57] ANGEL L. COTTO-NEGRON, a/k/a "Quija/Kija",
- [58] JOSE E. RIVERA-MALDONADO, a/k/a "Camon",
- [59] FNU LNU, a/k/a "Gaby",
- [60] JOSE D. RESTO-FIGUEROA, a/k/a "Tego",
- [61] ORLANDO PADILLA-AYALA, a/k/a "Oreo/Willito/Angel M. Santiago-Ayala",
- [62] KERNIS RODRIGUEZ-RIVERA, a/k/a "Sosa",
- [63] WALTER D. MULLER-COLON, a/k/a "Vampy/Bolo",
- [64] WILFREDO RUIZ, a/k/a "Freddy",
- [65] CARLOS E. BRIOSO-COLLANTES, a/k/a "El Barber/Wiso El Barber",
- [66] CARLOS VELAZQUEZ-FONTANEZ, a/k/a "Pirin",
- [67] JONATHAN FIGUEROA-CATINCHI, a/k/a "Katinchi",
- [68] IRAM I. SANTANDER-ZULUETA, a/k/a "Cubano",
- [69] CHARLIE J. FOURNIER-COLLAZO, a/k/a "Chiry",
- [70] EDGARDO R. RUANO-CHEVERE, a/k/a "Masacre/Masa",
- [71] FRANCISCO J. GONZALEZ-CAMACHO, a/k/a "Lento",
- [72] NESTOR R. CONCEPCION-RIVERA, a/k/a "Nesti/Kilate",
- [73] IVETTE VAZQUEZ-DROZ, a/k/a "Ive/Precious Moments",
- [74] BILLY VILLANUEVA-CARRASQUILLO, a/k/a "Meca/Billy Meca",
- [75] JAYFRANK QUIÑONES-CARRION,
- [76] FELIX RODRIGUEZ-RODRIGUEZ, a/k/a "Correa/Baloncelista/El Indio",
- [77] DANIEL O. MARTINEZ-VELEZ, a/k/a "Berto",
- [78] LUIS F. DIAZ-TINEO, a/k/a "Pipen/Pipe",
- [79] JOSUE O. FIGUEROA-RODRIGUEZ, a/k/a "Gordo Puta",
- [80] RAMON VICENTY-RIVERA, a/k/a "Poke",
- [81] LUIS E. GUADALUPE-CAMACHO, a/k/a "Yaya/Yayi/Ardilla",
- [82] JULIO N. MATOS-SANCHEZ, a/k/a "Julio Maraña",
- [83] REYNALDO GONZALEZ-ZAYAS, a/k/a "Cuto",
- [84] BRYAN MARTINEZ, a/k/a "Fat Boy",
- [85] DAMIAN FERNANDEZ-JORGE,
- [86] JOSE A. FOURNIER-COLLAZO, a/k/a "Semilla",
- [87] KEVIN CASTRO-VEGA,
- [88] JUAN GUADALUPE-DELGADO, a/k/a "Bocao",
- [89] DAVID GARCIA-FRANCO, a/k/a "David Nota",
- [90] GIOVANI JUSTINIANO-DIAZ, a/k/a "Zegueta",
- [91] CHRISTIAN VAZQUEZ-HERNANDEZ, a/k/a "Chapa",
- [92] JAMES STEELE-TORRES, a/k/a "Negro Steele",
- [93] NILDA SANTIAGO-ESPINOSA, a/k/a "Katy/Kathy",
- [94] ALEX SANTIAGO-CRESPO, a/k/a "Papo Swing/Ale",

- [95] FRANCISCO VARGAS-SANCHEZ, a/k/a "Maraña",
- [96] CARLOS MIRANDA, a/k/a "Eo",
- [97] RAMON ANDINO-PEGUERO, a/k/a "Mono",
- [98] VICTOR ALFONSO-JORGE, a/k/a "Nano",
- [99] HECTOR J. CRUZ-VARGAS, a/k/a "Punky",
- [100] YAMIL ARRIZMENDI-SANTANA, a/k/a "El Mono",
- [101] ROBERT D. PEREZ-NUÑEZ, a/k/a "Minino",
- [102] ANTHONY ESPADA-COLON, a/k/a "Oreo/Apu",
- [103] DANIEL DE-JESUS-DIAZ, a/k/a "Paleta",
- [104] LUIS E. ESPADA-COLON, a/k/a "Zona",
- [105] ASTRID J. MARTINEZ-VALENTIN, a/k/a "La Jefa",

shall forfeit to the United States pursuant to 21 U.S.C. § 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 violation, including but not limited to the following: \$82,000,000.

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

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. 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 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

All pursuant to 21 U.S.C. § 853.

FIREARMS FORFEITURE ALLEGATION

The allegations in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. §§ 1963 and 924(d)(1) and 28 U.S.C. § 2461(c).

Upon conviction of the offenses in violation of 18 U.S.C. §§ 1962(d), 924(c), and 924(j), as set forth in this Indictment,

- [1] JOSUE VAZQUEZ-CARRASQUILLO, a/k/a "Mayito/Mayo/El Father",
- [2] PEDRO VIGIO-APONTE, a/k/a "Pedrito/Pedrito He-Man/Pello/Pedrito Trauma",
- [3] FRANKIE ROSA-CALDERON, a/k/a "Anky/El Negro/Frank",
- [5] MIGUEL VAZQUEZ-MARTINEZ, a/k/a "Miguelo/Radio/Miclo/BJ",
- [7] ERNESTO MORALES-CASTRO, a/k/a "Nestor/Los Gorditos",
- [8] CHRISTIAN MORALES-CASTRO, a/k/a "Bimbo/Los Gorditos",
- [9] REYFRANK QUIÑONES-CARRION, a/k/a "Pelotero",
- [10] KELVIN D. MORALES-CINTRON,
- [11] ISMAEL MENDEZ-ARROYO, a/k/a "Bolillo",
- [14] JOSE L. ORTIZ-AGUIRRE, a/k/a "Cheo/Cheo Cedeño",
- [15] REINALDO RODRIGUEZ-MARTINEZ, a/k/a "Pitbull",
- [16] WILLIAM ORTIZ-AGUIRRE, a/k/a "Playa/Play",
- [17] KIDANNY FIGUEROA-OSORIO, a/k/a "Sony/Sonata",
- [18] JOSE L. SOTO-RIVERA, a/k/a "Luisito/Scary",
- [20] VICTOR M. RODRIGUEZ-TORRES, a/k/a "Cuca/Cucaracha/Papotin",
- [21] RAFAEL ANDINO-OJEDA, a/k/a "Rafa/Rafa Colgate/Boca Chula",
- [24] EMANUEL ZABALA-PEREZ, a/k/a "Punky/Dalmata",
- [25] ALEXANDER RIVERA-CARRION, a/k/a "Lechon",
- [28] ALEXIS CARTAGENA-GERENA, a/k/a "Pollo",
- [30] OSCAR A. CALVIÑO-ACEVEDO, a/k/a "Alex",
- [31] JESUS DE-JESUS-COLON, a/k/a "Romulo",
- [32] JOSE L. MENDEZ-DE-JESUS, a/k/a "Sonso/Nariz",
- [34] EDGAR GONZALEZ-RIVERA, a/k/a "Eggy",
- [36] XAVIER CASTRO-VEGA, a/k/a "Raton",
- [37] CARLOS M. GUERRERO-CASTRO, a/k/a "Carlitos El Negro/Marcel",
- [38] ANALDI TANCO-MORENO, a/k/a "Kimbato",
- [39] ORLANDO J. SANTANA, a/k/a "Fino",
- [40] LUIS F. RODRIGUEZ-MARQUEZ, a/k/a "Cheykin",
- [41] JESUS E. MONTALVAN-DIAZ, a/k/a "Luis Garcia-Diaz/Willy Wonka",
- [42] AMAURY MENDEZ-ROSADO, a/k/a "Boty",
- [43] LUIS YANYORE-PIZARRO, a/k/a "Kimbo/Bauncer/Jose Boria-Millan",
- [44] FNU LNU, a/k/a "Eziel",
- [45] LUIS MARTINEZ-NIEVES, a/k/a "Raya/Trenza",
- [46] MICHAEL RIVERA-RODRIGUEZ,

- [47] ALVIN A. CABEZAS-CINTRON, a/k/a "Ardilla",
- [48] JAIME M. SEMIDAY-PEREZ,
- [49] KENNY O. PACHECO, a/k/a "Keny/Bolin",
- [50] ROBERTO FUENTES-PACHECO, a/k/a "Junito Parcha",
- [51] ROGER FALU-DIAZ, a/k/a "Gua",
- [52] FELIX A. MALAVE-TORRES, a/k/a "Cholon",
- [53] EDGARDO LUNA-LOPEZ, a/k/a "Piri/Enano",
- [54] JESSY J. MELENDEZ-HERNANDEZ, a/k/a "Koby/El Negro/Lely",
- [55] DENZEL RODRIGUEZ-CARABALLO,
- [56] ABIMAEL CRUZ-RODRIGUEZ, a/k/a "Lindo/Feo/Metra",
- [59] FNU LNU, a/k/a "Gaby",
- [60] JOSE D. RESTO-FIGUEROA, a/k/a "Tego",
- [61] ORLANDO PADILLA-AYALA, a/k/a "Oreo/Willito/Angel M. Santiago-Ayala",
- [62] KERNIS RODRIGUEZ-RIVERA, a/k/a "Sosa",
- [63] WALTER D. MULLER-COLON, a/k/a "Vampy/Bolo",
- [64] WILFREDO RUIZ, a/k/a "Freddy",
- [65] CARLOS E. BRIOSO-COLLANTES, a/k/a "El Barber/Wiso El Barber",
- [66] CARLOS VELAZQUEZ-FONTANEZ,
- [67] JONATHAN FIGUEROA-CATINCHI, a/k/a "Katinchi",
- [69] CHARLIE J. FOURNIER-COLLAZO, a/k/a "Chiry",
- [72] NESTOR R. CONCEPCION-RIVERA, a/k/a "Nesti/Kilate",
- [76] FELIX RODRIGUEZ-RODRIGUEZ, a/k/a "Correa/Balancelista/El Indio",
- [77] DANIEL O. MARTINEZ-VELEZ, a/k/a "Berto",
- [80] RAMON VICENTY-RIVERA, a/k/a "Poke",
- [84] BRYAN MARTINEZ, a/k/a "Fat Boy",
- [86] JOSE A. FOURNIER-COLLAZO, a/k/a "Semilla",
- [87] KEVIN CASTRO-VEGA,
- [88] JUAN GUADALUPE-DELGADO, a/k/a "Bocao",
- [89] DAVID GARCIA-FRANCO, a/k/a "David Nota",
- [90] GIOVANI JUSTINIANO-DIAZ, a/k/a "Zegueta",
- [91] CHRISTIAN VAZQUEZ-HERNANDEZ, a/k/a "Chapa",
- [98] VICTOR ALFONSO-JORGE, a/k/a "Nano",
- [99] HECTOR J. CRUZ-VARGAS, a/k/a "Punky",
- [103] DANIEL DE-JESUS-DIAZ, a/k/a "Paleta",
- [104] LUIS E. ESPADA-COLON, a/k/a "Zona",

the defendants herein, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearm and ammunition involved or used in the knowing commission of the offense, including, but not limited to: one (1) Type: Pistol, Make: Taurus, Caliber: 9mm, Serial Number: TOD72701, one (1) Type: Pistol, Make: Smith & Wesson, Model: SW9VE, Caliber: 9mm, Serial Number: PBF6590, one (1) Rifle, Caliber: .22, Make: Rugger, Model:

1022, Serial Number: 114-98271, one (1) Type: Pistol, Make: Glock, Model: 32, Caliber: .357, Serial Number: obliterated, one (1) Type: Pistol, Make: Glock, Model: 21, Caliber: .45, Serial Number: FHB-741, one (1) Type: Pistol, Make: FNH, Model: Five Seven Semie, Caliber: 5.7 x 28, Serial Number: 38G124564, and one (1) Rifle, Caliber: 7.62 x 39, Serial Number: AD028382, one (1) Type: Pistol, Make: Taurus, Model: PT9ZAF, Caliber: 9mm, Serial Number: TYF95500, one (1) Type: Pistol, Make: Glock, Model: 20, Caliber: .357, Serial Number: GKV-411, one (1) Type: Pistol, Make: Glock, Model: 23, Caliber: .40, Serial Number: KMR-688, one (1) Type: Pistol, Make: Smith & Wesson, Model: 5906, Caliber: 9mm, Serial Number: TCL5650, one (1) Type: Revolver, Make: Magnum, Caliber: .357, Model: 65-3, Serial Number: AEY0037, one (1) Type: Revolver, Make: Colt, Model: Magnum, Caliber: .357, Serial Number: L-73556, one (1) Type: Pistol, Make: Smith & Wesson, Model: 5906, Caliber: 9mm, Serial Number: TYN3286, one (1) Type: Pistol, Make: S&W, Model: 6906, Caliber: 9mm, Serial Number: VAN0235, one (1) Type: Pistol, Make: Glock, Model: 23, Caliber: .40, Serial Number: AUS819, one (1) Type: Pistol, Make: Smith & Wesson, Model: MP, Caliber: .40, one (1) Type: Pistol, Make: Glock, Model: 23, Caliber: .40, Serial Number: EAW185, one (1) Type: Pistol, Make: Glock, Model: 22, Caliber: .40, Serial Number: RFD072, one (1) Type: Pistol, Make: Glock, Model: 22, Caliber: .40, Serial Number: ERZ359, one (1) Type: Pistol, Make: S&W, Model: MP, Caliber: .40, Serial Number: MPB2756, one (1) Type: Pistol, Make: Glock, Model: 22, Caliber: .40, Serial Number: EHC046, one (1) Rifle, Caliber: 7.62 x 39, Model: WASR-10, Serial Number: 1-70605-4, one (1) Rifle, Caliber: .223, Serial Number: 052220, one (1) Type: Pistol, Make: Glock, Model: 27, Caliber: .40, Serial Number: RUC484, one (1) Type: Pistol, Make: Glock, Model: 32a, Caliber: .357, Serial Number: LKP505, one (1) Rifle, Caliber: 5.56, Make: Colt, Serial Number: obliterated, one (1) Type: Pistol, Make: Glock, Model: 22, Caliber:


.40, Serial Number: ACY-867, one (1) Type: Revolver, Make: Ruger, Model: Speed-Six, Caliber: .357, Serial Number: 158-14081, one (1) Rifle, Caliber: 7.62 x 39, Make: Draco Romarm/Cugir, Serial Number: DC-7805-11 RO, one (1) Rifle, Caliber: 7.62 x 39, Model: GP WASR-10-63, Make: ROMARM, Serial Number: 1973 ET 0988, one (1) Type: Revolver, Make: Colt, Model: Detective Special, Caliber: .38, Serial Number: 44539 and ammunition.

All pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(C).

TRUE BILL,
FOREPERSON'

Date: 2/17/15

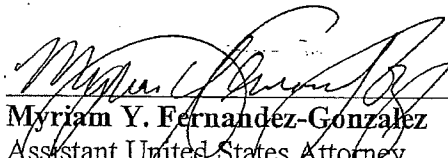
ROSA EMILIA RODRIGUEZ-VELEZ
United States Attorney



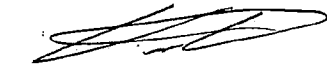
Jose A. Ruiz-Santiago
Assistant United States Attorney
Chief, Criminal Division



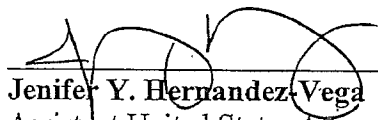
Alberto R. Lopez-Rocafort
Assistant United States Attorney



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



Victor O. Acevedo-Hernandez
Assistant United States Attorney



Jenifer Y. Hernandez-Vega
Assistant United States Attorney
Chief, Violent Crimes Unit