

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

LEONIDES SIERRA, :

a/k/a "Junito," :

a/k/a "Junior," :

RICHARD GONZALEZ, :

a/k/a "Webb," :

a/k/a "Webb Killa," :

JOSE CRUZ, :

a/k/a "Prostituto," :

a/k/a "Prosti," :

CARLOS URENA :

a/k/a "Salcedo," :

a/k/a "White Boy," :

EDWIN CIRIACO, :

a/k/a "Machete," :

a/k/a "Bobie," :

ANIBAL RAMOS, :

a/k/a "Moreno," :

ALFRED LAFORD, :

a/k/a "Sony," :

ANTONIO PENA, :

a/k/a "La Percha," :

JULIO BRITO, :

a/k/a "Fresh," :

JUAN NUNEZ, :

a/k/a "Jesu Christo," :

CHRISTOPHER JOHNSON, :

a/k/a "Chris," :

DONALD NOVAS, :

a/k/a "Oliver," :

a/k/a "Soca," :

a/k/a "Vale," :

a/k/a "Fish," :

JOSE FELICIANO, :

a/k/a "Lito," :

FELIX LOPEZ-CABRERA, :

a/k/a "Suztancia," :

CARLOS LOPEZ, :

a/k/a "Carlito," :

JOSE MARMELEJOS, :

a/k/a "Ochenta," :

NOEL ACOSTA-DISLA, :

a/k/a "Fugitivo,"

SEALED  
SUPERSEDING  
INDICTMENT

S1 11 Cr. 1032 (PAE)

TOMAS CASTILLO, :  
a/k/a "Chobolo," :  
a/k/a "Chobolito," :  
HUGO ALMONTE, :  
a/k/a "Fufu," :  
CESAR ALMONTE, :  
a/k/a "Bullet," :  
CARLONELL PAULINO, :  
a/k/a "Pope," :  
RONALD PERALTA, :  
a/k/a "Romo," :  
JOSE CASTILLO, :  
a/k/a "Smith," :  
a/k/a "Jay Blanco," :  
a/k/a "Daddy," :  
MARK MARTINEZ, :  
JOSE BALLEENILLA, :  
a/k/a "Correa," :  
LUIS BELTRAN, :  
a/k/a "Gualey," :  
LUIS CABRERA-RECIO, :  
a/k/a "Nueve," :  
a/k/a "Nuevecito," :  
LOREN GUZMAN, :  
a/k/a "Crispy," :  
MELVIN AMPARO, :  
a/k/a "Flynt," :  
JONATHAN MAJDANSKI, :  
a/k/a "Indio," :  
MIGUEL STRONG, :  
a/k/a "Kiki," :  
JOSE BARCARER, :  
a/k/a "Papotico," :  
a/k/a "Basura," :  
JOSE GERONIMO-FIGUEROA, :  
a/k/a "Mocha," :  
EDGARDO PONCE, :  
a/k/a "Tito," :  
MICHAEL DELACRUZ, :  
a/k/a "40," :  
DAVID PATINO, :  
a/k/a "Bori," :  
a/k/a "Chingo," :  
EDUARDO HOLGUIN, :  
a/k/a "Baston" :  
RONNY EVANGELISTA, :  
LUIS CABRERA, :  
a/k/a "Bling Bling," :

CARLOS RODRIGUEZ, :  
HENRY O. PENA, :  
a/k/a "Melmo," :  
DAVE McPHERSON, :  
VANCE HILL, :  
a/k/a "Shata," :  
GREYDIN LIZ-CASTILLO, :  
a/k/a "Pollito," :  
NELSON JORGE-MARTINEZ, :  
a/k/a "Chico Chico," :  
LUIS SALADIN, :  
a/k/a "King," :  
CHRISTOPHER ROBLES, :  
a/k/a "Dorita," :  
JOSEPH HERNANDEZ, :  
JONATHAN EVANGELISTA, and :  
HENRY PAULINO, :  
a/k/a "Bam Bam," :  
:   
Defendants. :  
:   
- - - - - x

COUNT ONE

RACKETEERING CONSPIRACY

The Grand Jury charges:

THE ENTERPRISE

1. At all times relevant to this Indictment, LEONIDES SIERRA, a/k/a "Junito," a/k/a "Junior," RICHARD GONZALEZ, a/k/a "Webb," a/k/a "Webb Killa," JOSE CRUZ, a/k/a "Prostituto," a/k/a "Prosti," CARLOS URENA, a/k/a "Salcedo," a/k/a "White Boy," EDWIN CIRIACO, a/k/a "Machete," a/k/a "Bobie," ANIBAL RAMOS, a/k/a "Moreno," ALFRED LAFORD, a/k/a "Sony," ANTONIO PENA, a/k/a "La Percha," JULIO BRITO, a/k/a "Fresh," JUAN NUNEZ, a/k/a "Jesu Christo," CHRISTOPHER JOHNSON, a/k/a "Chris," DONALD NOVAS, a/k/a "Oliver," a/k/a "Soca," a/k/a "Vale," a/k/a

"Fish," JOSE FELICIANO, a/k/a "Lito," FELIX LOPEZ-CABRERA, a/k/a "Suztancia," CARLOS LOPEZ, a/k/a "Carlito," JOSE MARMELEJOS, a/k/a "Ochenta," NOEL ACOSTA-DISLA, a/k/a "Fugitivo," TOMAS CASTILLO, a/k/a "Chobolo," a/k/a "Chobolito," HUGO ALMONTE, a/k/a "Fufu," CESAR ALMONTE, a/k/a "Bullet," CARLONELL PAULINO, a/k/a "Pope," RONALD PERALTA, a/k/a "Romo," JOSE CASTILLO, a/k/a "Smith," a/k/a "Jay Blanco," a/k/a "Daddy," MARK MARTINEZ, JOSE BALLEENILLA, a/k/a "Correa," LUIS BELTRAN, a/k/a "Gualey," LUIS CABRERA-RECIO, a/k/a "Nueve," a/k/a "Nuevecito," LOREN GUZMAN, a/k/a "Crispy," MELVIN AMPARO, a/k/a "Flynt," JONATHAN MAJDANSKI, a/k/a "Indio," MIGUEL STRONG, a/k/a "Kiki," JOSE BARCARER, a/k/a "Papotico," a/k/a "Basura," JOSE GERONIMO-FIGUEROA, a/k/a "Mocha," EDGARDO PONCE, a/k/a "Tito," MICHAEL DELACRUZ, a/k/a "40," DAVID PATINO, a/k/a "Bori," a/k/a "Chingo," EDUARDO HOLGUIN, a/k/a "Baston," RONNY EVANGELISTA, LUIS CABRERA, a/k/a "Bling Bling," CARLOS RODRIGUEZ, and HENRY O. PENA, a/k/a "Melmo," the defendants, and others known and unknown, were members and associates of the Bronx Trinitarios Gang ("BTG"), a criminal organization whose members and associates engaged in, among other things, narcotics trafficking, attempted murder, and murder. The BTG operated principally in the Bronx, New York.

2. The BTG, including its leadership, membership, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of

individuals associated in fact, although not a legal entity. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. At all times relevant to this Indictment, the enterprise has engaged in, and its activities affected, interstate and foreign commerce. The defendants participated in the operation and management of the enterprise, and participated in unlawful and other activities in furtherance of the conduct of the enterprise's affairs.

3. LEONIDES SIERRA, a/k/a "Junito," a/k/a "Junior," RICHARD GONZALEZ, a/k/a "Webb," a/k/a "Webb Killa," JOSE CRUZ, a/k/a "Prostituto," a/k/a "Prosti," CARLOS URENA, a/k/a "Salcedo," a/k/a "White Boy," EDWIN CIRIACO, a/k/a "Machete," a/k/a "Bobie," ANIBAL RAMOS, a/k/a "Moreno," and ANTONIO PENA, a/k/a "La Percha," the defendants, were leaders and members of the Enterprise who directed other members of the Enterprise in carrying out unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

4. Numerous members of the Enterprise were also members of a smaller gang within the BTG, known as the "Bad Boys." The Head of the Bad Boys was JOSE CRUZ, a/k/a "Prostituto," a/k/a "Prosti," the defendant.

PURPOSES OF THE ENTERPRISE

5. The purposes of the enterprise included the following:

a. Enriching the members and associates of the enterprise through, among other things, the distribution of narcotics, including marijuana, cocaine base, powder cocaine, and illegal prescription medication, including oxycodone, a schedule II controlled substance, and suboxone, a schedule III controlled substance.

b. Preserving and protecting the power of the enterprise and its members and associates through murder, attempted murder, other acts of violence, and threats of violence.

c. Promoting and enhancing the enterprise and the activities of its members and associates.

MEANS AND METHODS OF THE ENTERPRISE

6. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of the enterprise were the following:

a. Members and associates of the enterprise committed, conspired to commit, and attempted to commit acts of violence, including murder, to protect and expand the enterprise's criminal operations, and in connection with rivalries with members of other street gangs, such as the Bloods,

Dominicans Don't Play, the Crips, and the Latin Kings.

b. Members and associates of the enterprise used physical violence and threats of violence, including murder and attempted murder, against others, including in particular rival gang members and rival narcotics traffickers.

c. Members and associates of the enterprise used physical violence against various people, including murders and attempted murders.

d. Members and associates of the enterprise sold narcotics, including marijuana, cocaine base, powder cocaine, and illegal prescription medication, including oxycodone and suboxone.

#### THE RACKETEERING CONSPIRACY

7. From at least in or about 2003, up to and including on or about the date of the filing of this Indictment, in the Southern District of New York and elsewhere, LEONIDES SIERRA, a/k/a "Junito," a/k/a "Junior," RICHARD GONZALEZ, a/k/a "Webb," a/k/a "Webb Killa," JOSE CRUZ, a/k/a "Prostituto," a/k/a "Prosti," CARLOS URENA, a/k/a "Salcedo," a/k/a "White Boy," EDWIN CIRIACO, a/k/a "Machete," a/k/a "Bobie," ANIBAL RAMOS, a/k/a "Moreno," ALFRED LAFORD, a/k/a "Sony," ANTONIO PENA, a/k/a "La Percha," JULIO BRITO, a/k/a "Fresh," JUAN NUNEZ, a/k/a "Jesu Christo," CHRISTOPHER JOHNSON, a/k/a "Chris," DONALD NOVAS, a/k/a "Oliver," a/k/a "Soca," a/k/a "Vale," a/k/a "Fish," JOSE

FELICIANO, a/k/a "Lito," FELIX LOPEZ-CABRERA, a/k/a "Suztancia," CARLOS LOPEZ, a/k/a "Carlito," JOSE MARMELEJOS, a/k/a "Ochenta," NOEL ACOSTA-DISLA, a/k/a "Fugitivo," TOMAS CASTILLO, a/k/a "Chobolo," a/k/a "Chobolito," HUGO ALMONTE, a/k/a "Fufu," CESAR ALMONTE, a/k/a "Bullet," CARLONELL PAULINO, a/k/a "Pope," RONALD PERALTA, a/k/a "Romo," JOSE CASTILLO, a/k/a "Smith," a/k/a "Jay Blanco," a/k/a "Daddy," MARK MARTINEZ, JOSE BALLEENILLA, a/k/a "Correa," LUIS BELTRAN, a/k/a "Gualey," LUIS CABRERA-RECIO, a/k/a "Nueve," a/k/a "Nuevecito," LOREN GUZMAN, a/k/a "Crispy," MELVIN AMPARO, a/k/a "Flynt," JONATHAN MAJDANSKI, a/k/a "Indio," MIGUEL STRONG, a/k/a "Kiki," JOSE BARCARER, a/k/a "Papotico," a/k/a "Basura," JOSE GERONIMO-FIGUEROA, a/k/a "Mocha," EDGARDO PONCE, a/k/a "Tito," MICHAEL DELACRUZ, a/k/a "40," DAVID PATINO, a/k/a "Bori," a/k/a "Chingo," EDUARDO HOLGUIN, a/k/a "Baston," RONNY EVANGELISTA, LUIS CABRERA, a/k/a "Bling Bling," CARLOS RODRIGUEZ, and HENRY O. PENA, a/k/a "Melmo," the defendants, and others known and unknown, being persons employed by and associated with the enterprise described in paragraphs 1 through 6 of Count One of this Indictment, to wit, the BTG, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Section 1962(c) of Title 18, United States Code, that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the BTG enterprise, which was engaged in, and



the activities of which affected, interstate and foreign commerce, through a pattern of racketeering activity consisting of multiple acts involving murder and kidnapping, chargeable under the following provisions of state law:

New York Penal Law, Sections 20.00 and 125.25 (murder);

New York Penal Law, Sections 20.00, 110.00, and 125.25 (attempted murder);

New York Penal Law, Sections 105.15 and 125.25 (conspiracy to murder);

New York Penal Law, Sections 20.00 and 135.20 (kidnapping);  
and

multiple acts involving the distribution of controlled substances, including 100 kilograms and more of marijuana, 28 grams and more of cocaine base, and quantities of powder cocaine, oxycodone, and suboxone, in violation of the laws of the United States, specifically Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(B), (b)(1)(C), (b)(1)(E), and 846, and Title 18, United States Code, Section 2.

8. It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

(Title 18, United States Code, Section 1962(d).)

COUNT TWO

NARCOTICS CONSPIRACY

The Grand Jury further charges:

9. From in or about 2003 up to and including the date of the filing of this Indictment, in the Southern District of New York and elsewhere, LEONIDES SIERRA, a/k/a "Junito," a/k/a "Junior," RICHARD GONZALEZ, a/k/a "Webb," a/k/a "Webb Killa," JOSE CRUZ, a/k/a "Prostituto," a/k/a "Prosti," CARLOS URENA, a/k/a "Salcedo," a/k/a "White Boy," EDWIN CIRIACO, a/k/a "Machete," a/k/a "Bobie," ANIBAL RAMOS, a/k/a "Moreno," ALFRED LAFORD, a/k/a "Sony," ANTONIO PENA, a/k/a "La Percha," JULIO BRITO, a/k/a "Fresh," JUAN NUNEZ, a/k/a "Jesu Christo," CHRISTOPHER JOHNSON, a/k/a "Chris," DONALD NOVAS, a/k/a "Oliver," a/k/a "Soca," a/k/a "Vale," a/k/a "Fish," JOSE FELICIANO, a/k/a "Lito," FELIX LOPEZ-CABRERA, a/k/a "Suztancia," CARLOS LOPEZ, a/k/a "Carlito," JOSE MARMELEJOS, a/k/a "Ochenta," TOMAS CASTILLO, a/k/a "Chobolo," a/k/a "Chobolito," HUGO ALMONTE, a/k/a "Fufu," CESAR ALMONTE, a/k/a "Bullet," CARLONELL PAULINO, a/k/a "Pope," RONALD PERALTA, a/k/a "Romo," JOSE CASTILLO, a/k/a "Smith," a/k/a "Jay Blanco," a/k/a "Daddy," MARK MARTINEZ, JOSE BALLEENILLA, a/k/a "Correa," LUIS BELTRAN, a/k/a "Gualey," LUIS CABRERA-RECIO, a/k/a "Nueve," a/k/a "Nuevecito," LOREN GUZMAN, a/k/a "Crispy," MELVIN AMPARO, a/k/a "Flynt," JONATHAN MAJDANSKI, a/k/a "Indio," MIGUEL STRONG, a/k/a "Kiki," JOSE BARCARER, a/k/a

"Papotico," a/k/a "Basura," JOSE GERONIMO-FIGUEROA, a/k/a "Mocha," EDGARDO PONCE, a/k/a "Tito," MICHAEL DELACRUZ, a/k/a "40," DAVID PATINO, a/k/a "Bori," a/k/a "Chingo," EDUARDO HOLGUIN, a/k/a "Baston," RONNY EVANGELISTA, LUIS CABRERA, a/k/a "Bling Bling," CARLOS RODRIGUEZ, HENRY O. PENA, a/k/a "Melmo," DAVE McPHERSON, VANCE HILL, a/k/a "Shata," GREYDIN LIZ-CASTILLO, a/k/a "Pollito," NELSON JORGE-MARTINEZ, a/k/a "Chico Chico," LUIS SALADIN, a/k/a "King," CHRISTOPHER ROBLES, a/k/a "Dorita," JOSEPH HERNANDEZ, JONATHAN EVANGELISTA, and HENRY PAULINO, a/k/a "Bam Bam," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

10. It was a part and an object of the conspiracy that the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

11. The controlled substances involved in the offense were (1) 100 kilograms and more of a quantity of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(B); (2) 28 grams and more of a quantity of mixtures and substances containing a detectable amount of cocaine base, in violation of

Title 21, United States Code, Section 841(b)(1)(B); (3) a quantity of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C); (4) a quantity of mixtures and substances containing a detectable amount of oxycodone, a schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (5) a quantity of mixtures and substances containing a detectable amount of suboxone, a schedule III controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(E).

(Title 21, United States Code, Section 846.)

COUNT THREE

FIREARMS OFFENSE

The Grand Jury further charges:

12. From in or about 2003, up to and including in or about October 2011, in the Southern District of New York, LEONIDES SIERRA, a/k/a "Junito," a/k/a "Junior," RICHARD GONZALEZ, a/k/a "Webb," a/k/a "Webb Killa," JOSE CRUZ, a/k/a "Prostituto," a/k/a "Prosti," CARLOS URENA, a/k/a "Salcedo," a/k/a "White Boy," EDWIN CIRIACO, a/k/a "Machete," a/k/a "Bobie," ALFRED LAFORD, a/k/a "Sony," ANTONIO PENA, a/k/a "La Percha," JULIO BRITO, a/k/a "Fresh," JUAN NUNEZ, a/k/a "Jesu Christo," CHRISTOPHER JOHNSON, a/k/a "Chris," DONALD NOVAS, a/k/a "Oliver," a/k/a "Soca," a/k/a "Vale," a/k/a "Fish," JOSE FELICIANO, a/k/a

"Lito," FELIX LOPEZ-CABRERA, a/k/a "Suztancia," CARLOS LOPEZ, a/k/a "Carlito," JOSE MARMELEJOS, a/k/a "Ochenta," NOEL ACOSTA-DISLA, a/k/a "Fugitivo," TOMAS CASTILLO, a/k/a "Chobolo," a/k/a "Chobolito," HUGO ALMONTE, a/k/a "Fufu," CESAR ALMONTE, a/k/a "Bullet," CARLONELL PAULINO, a/k/a "Pope," RONALD PERALTA, a/k/a "Romo," JOSE CASTILLO, a/k/a "Smith," a/k/a "Jay Blanco," a/k/a "Daddy," MARK MARTINEZ, JOSE BALLEENILLA, a/k/a "Correa," LUIS BELTRAN, a/k/a "Gualey," LUIS CABRERA-RECIO, a/k/a "Nueve," a/k/a "Nuevecito," LOREN GUZMAN, a/k/a "Crispy," MELVIN AMPARO, a/k/a "Flynt," JONATHAN MAJDANSKI, a/k/a "Indio," MIGUEL STRONG, a/k/a "Kiki," JOSE BARCARER, a/k/a "Papotico," a/k/a "Basura," JOSE GERONIMO-FIGUEROA, a/k/a "Mocha," EDGARDO PONCE, a/k/a "Tito," MICHAEL DELACRUZ, a/k/a "40," DAVID PATINO, a/k/a "Bori," a/k/a "Chingo," EDUARDO HOLGUIN, a/k/a "Baston," RONNY EVANGELISTA, LUIS CABRERA, a/k/a "Bling Bling," CARLOS RODRIGUEZ, HENRY O. PENA, a/k/a "Melmo," LUIS SALADIN, a/k/a King," CHRISTOPHER ROBLES, a/k/a "Dorita," and JOSEPH HERNANDEZ, the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the racketeering offense charged in Count One of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use,

carrying, and possession of firearms, which were discharged on multiple occasions at multiple victims.

(Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.)

COUNT FOUR

FIREARMS TRAFFICKING

The Grand Jury further charges:

13. In or about 2011, in the Southern District of New York and elsewhere, JOSE CRUZ, a/k/a "Prostituto," a/k/a "Prosti," CARLOS URENA, a/k/a "Salcedo," a/k/a "White Boy," CHRISTOPHER JOHNSON, a/k/a "Chris," DONALD NOVAS, a/k/a "Oliver," a/k/a "Soca," a/k/a "Vale," a/k/a "Fish," JOSE MARMELEJOS, a/k/a "Ochenta," HUGO ALMONTE, a/k/a "Fufu," MARK MARTINEZ, JOSE BALLEENILLA, a/k/a "Correa," LUIS CABRERA-RECIO, a/k/a "Nueve," a/k/a "Nuevecito," EDUARDO HOLGUIN, a/k/a "Baston," DAVE McPHERSON, LUIS SALADIN, a/k/a "King," and HENRY PAULINO, a/k/a "Bam Bam," the defendants, not being licensed importers, licensed manufacturers, and licensed dealers, willfully and knowingly, did engage in the business of dealing in firearms, and in the course of such business did receive and transport firearms in interstate and foreign commerce, to wit, CRUZ, URENA, JOHNSON, NOVAS, MARMELEJOS, ALMONTE, MARTINEZ, BALLEENILLA, CABRERA-RECIO, HOLGUIN, McPHERSON, SALADIN, and PAULINO, together with others known and unknown, sold and transported in interstate commerce a Romarn/CUGIR model SAR-1 semiautomatic rifle, a Norinco Model SKS

7 semiautomatic rifle, a Browning sawed-off 12-gauge shotgun, a Beretta 9mm pistol, a Ruger .40 caliber pistol, a Leinad 9mm pistol, an Eibar .32-20 caliber revolver, a Calico .22 caliber pistol, and a Smith and Wesson .44 caliber revolver, among other firearms.

(Title 18, United States Code, Sections 922(a)(1)(A) and 2.)

FORFEITURE ALLEGATION AS TO COUNT ONE

14. 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 Title 18, United States Code, Section 1963. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963 in the event of the defendants' convictions under Count One of this Indictment.

15. LEONIDES SIERRA, a/k/a "Junito," a/k/a "Junior," RICHARD GONZALEZ, a/k/a "Webb," a/k/a "Webb Killa," JOSE CRUZ, a/k/a "Prostituto," a/k/a "Prosti," CARLOS URENA, a/k/a "Salcedo," a/k/a "White Boy," EDWIN CIRIACO, a/k/a "Machete," a/k/a "Bobie," ANIBAL RAMOS, a/k/a "Moreno," ALFRED LAFORD, a/k/a "Sony," ANTONIO PENA, a/k/a "La Percha," JULIO BRITO, a/k/a "Fresh," JUAN NUNEZ, a/k/a "Jesu Christo," CHRISTOPHER JOHNSON,

a/k/a "Chris," DONALD NOVAS, a/k/a "Oliver," a/k/a "Soca," a/k/a "Vale," a/k/a "Fish" JOSE FELICIANO, a/k/a "Lito," FELIX LOPEZ-CABRERA, a/k/a "Suztancia," CARLOS LOPEZ, a/k/a "Carlito," JOSE MARMELEJOS, a/k/a "Ochenta," NOEL ACOSTA-DISLA, a/k/a "Fugitivo," TOMAS CASTILLO, a/k/a "Chobolo," a/k/a "Chobolito," HUGO ALMONTE, a/k/a "Fufu," CESAR ALMONTE, a/k/a "Bullet," CARLONELL PAULINO, a/k/a "Pope," RONALD PERALTA, a/k/a "Romo," JOSE CASTILLO, a/k/a "Smith," a/k/a "Jay Blanco," a/k/a "Daddy," MARK MARTINEZ, JOSE BALLEENILLA, a/k/a "Correa," LUIS BELTRAN, a/k/a "Gualey," LUIS CABRERA-RECIO, a/k/a "Nueve," a/k/a "Nuevecito," LOREN GUZMAN, a/k/a "Crispy," MELVIN AMPARO, a/k/a "Flynt," JONATHAN MAJDANSKI, a/k/a "Indio," MIGUEL STRONG, a/k/a "Kiki," JOSE BARCARER, a/k/a "Papotico," a/k/a "Basura," JOSE GERONIMO-FIGUEROA, a/k/a "Mocha," EDGARDO PONCE, a/k/a "Tito," MICHAEL DELACRUZ, a/k/a "40," DAVID PATINO, a/k/a "Bori," a/k/a "Chingo," EDUARDO HOLGUIN, a/k/a "Baston," RONNY EVANGELISTA, LUIS CABRERA, a/k/a "Bling Bling," CARLOS RODRIGUEZ, and HENRY O. PENA, a/k/a "Melmo," the defendants:

a. have acquired and maintained interests in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);

b. have property constituting and derived from proceeds obtained, directly, and indirectly, from the aforesaid



racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3).

16. The interests of the defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963 (a) (1), and (3), include but are not limited to:

a. a sum that represents the gross proceeds received by the defendants pursuant to their racketeering activities as alleged in Count One during the relevant time period alleged in the Indictment and all interests and proceeds traceable thereto.

17. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;

or

e. has been commingled with other property which

cannot be subdivided without difficulty;  
it is the intent of the United States, pursuant to Title 18,  
United States Code, Section 1963(m), to seek forfeiture of any  
other property of said defendants up to the value of the above  
forfeitable property.

18. The above-named defendants are jointly and  
severally liable for the forfeiture obligations as alleged above.

(Title 18, United States Code, Section 1963.)

FORFEITURE ALLEGATION AS TO COUNT TWO

19. As a result of committing the controlled substance  
offenses alleged in Count Two of this Indictment, LEONIDES  
SIERRA, a/k/a "Junito," a/k/a "Junior," RICHARD GONZALEZ, a/k/a  
"Webb," a/k/a "Webb Killa," JOSE CRUZ, a/k/a "Prostituto," a/k/a  
"Prosti," CARLOS URENA, a/k/a "Salcedo," a/k/a "White Boy," EDWIN  
CIRIACO, a/k/a "Machete," a/k/a "Bobie," ANIBAL RAMOS, a/k/a  
"Moreno," ALFRED LAFORD, a/k/a "Sony," ANTONIO PENA, a/k/a "La  
Percha," JULIO BRITO, a/k/a "Fresh," JUAN NUNEZ, a/k/a "Jesu  
Christo," CHRISTOPHER JOHNSON, a/k/a "Chris," DONALD NOVAS, a/k/a  
"Oliver," a/k/a "Soca," a/k/a "Vale," a/k/a "Fish" JOSE  
FELICIANO, a/k/a "Lito," FELIX LOPEZ-CABRERA, a/k/a "Suztancia,"  
CARLOS LOPEZ, a/k/a "Carlito," JOSE MARMELEJOS, a/k/a "Ochenta,"  
TOMAS CASTILLO, a/k/a "Chobolo," a/k/a "Chobolito," HUGO ALMONTE,  
a/k/a "Fufu," CESAR ALMONTE, a/k/a "Bullet," CARLONELL PAULINO,  
a/k/a "Pope," RONALD PERALTA, a/k/a "Romo," JOSE CASTILLO, a/k/a

"Smith," a/k/a "Jay Blanco," a/k/a "Daddy," MARK MARTINEZ, JOSE BALLEENILLA, a/k/a "Correa," LUIS BELTRAN, a/k/a "Gualey," LUIS CABRERA-RECIO, a/k/a "Nueve," a/k/a "Nuevecito," LOREN GUZMAN, a/k/a "Crispy," MELVIN AMPARO, a/k/a "Flynt," JONATHAN MAJDANSKI, a/k/a "Indio," MIGUEL STRONG, a/k/a "Kiki," JOSE BARCARER, a/k/a "Papotico," a/k/a "Basura," JOSE GERONIMO-FIGUEROA, a/k/a "Mocha," EDGARDO PONCE, a/k/a "Tito," MICHAEL DELACRUZ, a/k/a "40," DAVID PATINO, a/k/a "Bori," a/k/a "Chingo;" EDUARDO HOLGUIN, a/k/a "Baston," RONNY EVANGELISTA, LUIS CABRERA, a/k/a "Bling Bling," CARLOS RODRIGUEZ, HENRY O. PENA, a/k/a "Melmo," DAVE MCPHERSON, VANCE HILL, a/k/a "Shata," GREYDIN LIZ-CASTILLO, a/k/a "Pollito," NELSON JORGE-MARTINEZ, a/k/a "Chico Chico," LUIS SALADIN, a/k/a "King," CHRISTOPHER ROBLES, a/k/a "Dorita," JOSEPH HERNANDEZ, JONATHAN EVANGELISTA, and HENRY PAULINO, a/k/a "Bam Bam," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendants obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Count Two of this Indictment, including but not limited to, the following:

- a. A sum in United States currency representing

the amount of all proceeds obtained as a result of the controlled substance offenses alleged in Count Two of the Indictment.

Substitute Asset Provision

20. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

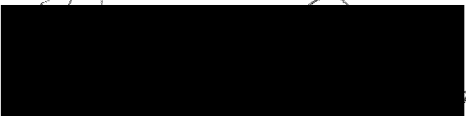
c. has been placed beyond the jurisdiction of the Court;

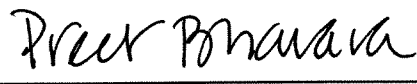
d. has been substantially diminished in value;  
or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 846 and 853.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

LEONIDES SIERRA, a/k/a "Junito," a/k/a "Junior," RICHARD GONZALEZ, a/k/a "Webb," a/k/a "Webb Killa," JOSE CRUZ, a/k/a "Prostituto," a/k/a "Prosti," CARLOS URENA, a/k/a "Salcedo," a/k/a "White Boy," EDWIN CIRIACO, a/k/a "Machete," a/k/a "Bobie," ANIBAL RAMOS, a/k/a "Moreno," ALFRED LAFORD, a/k/a "Sony," ANTONIO PENA, a/k/a "La Percha," JULIO BRITO, a/k/a "Fresh," JUAN NUNEZ, a/k/a "Jesu Christo," CHRISTOPHER JOHNSON, a/k/a "Chris," DONALD NOVAS, a/k/a "Oliver," a/k/a "Soca," a/k/a "Vale," a/k/a "Fish" JOSE FELICIANO, a/k/a "Lito," FELIX LOPEZ-CABRERA, a/k/a "Suztancia," CARLOS LOPEZ, a/k/a "Carlito," JOSE MARMELEJOS, a/k/a "Ochenta," NOEL ACOSTA-DISLA, a/k/a "Fugitivo," TOMAS CASTILLO, a/k/a "Chobolo," a/k/a "Chobolito," HUGO ALMONTE, a/k/a "Fufu," CESAR ALMONTE, a/k/a "Bullet," CARLONELL PAULINO, a/k/a "Pope," RONALD PERALTA, a/k/a "Romo," JOSE CASTILLO, a/k/a "Smith," a/k/a "Jay Blanco," a/k/a "Daddy," MARK MARTINEZ, JOSE BALLEENILLA, a/k/a "Correa," LUIS BELTRAN, a/k/a "Gualey," LUIS CABRERA-RECIO, a/k/a "Nueve," a/k/a "Nuevecito," LOREN GUZMAN, a/k/a "Crispy," MELVIN AMPARO, a/k/a "Flynt," JONATHAN MAJDANSKI, a/k/a "Indio," MIGUEL STRONG, a/k/a "Kiki," JOSE BARCARER, a/k/a "Papotico," a/k/a "Basura," JOSE GERONIMO-FIGUEROA, a/k/a "Mocha," EDGARDO PONCE, a/k/a "Tito," MICHAEL DELACRUZ, a/k/a "40," DAVID PATINO, a/k/a "Bori," a/k/a "Chingo," EDUARDO HOLGUIN, a/k/a "Baston," RONNY EVANGELISTA, LUIS CABRERA, a/k/a "Bling Bling," CARLOS RODRIGUEZ, HENRY O. PENA, a/k/a "Melmo," DAVE McPHERSON, VANCE HILL, a/k/a "Shata," GREYDIN LIZ-CASTILLO, a/k/a "Pollito," NELSON JORGE-MARTINEZ, a/k/a "Chico Chico," LUIS SALADIN, a/k/a "King," CHRISTOPHER ROBLES, a/k/a "Dorita," JOSEPH HERNANDEZ, JONATHAN EVANGELISTA, and HENRY PAULINO, a/k/a "Bam Bam,"

Defendants.

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SUPERSEDING INDICTMENT

S1 11 Cr. 1032 (PAE)

(18 U.S.C. §§ 1962(d), 922(a)(1), 924(c)(1)(A)(iii), 2  
and 21 U.S.C. 846).)

PREET BHARARA  
United States Attorney.

A TRUE BILL