

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. **14 - 20551**

CR-MORENO

21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
21 U.S.C. § 853

/O'SULLIVAN

UNITED STATES OF AMERICA

vs.

**GIOVANNY BRENES,
JORGE CANELA, Jr., and
CARLOS LUIS RUIZ,**

Defendants.

INDICTMENT

The Grand Jury charges that:

COUNT 1

Beginning on or about April 24, 2013 and continuing through on or about June 5, 2013,
in Miami-Dade County, in the Southern District of Florida, the defendants,

**GIOVANNY BRENES and
JORGE CANELA, Jr.,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

With respect to defendants **GIOVANNY BRENES and JORGE CANELA, Jr.**, the controlled substance involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a mixture and

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Certified to be a true and correct copy of the document on file
Steven M. Larimore, Clerk,
U.S. District Court
Southern District of Florida
By *Debra Blakely* Deputy Clerk
Date *7/31/14*

substance containing a detectable amount of 3,4-Methylenedioxy-N-Methylcathinone Hydrochloride, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 2

On or about May 3, 2013, in Miami-Dade County, in the Southern District of Florida, the defendant,

CARLOS LUIS RUIZ,

did knowingly and intentionally attempt to possess a controlled substance, in violation of Title 21, United States Code, Section 844(a); all in violation of Title 21, United States Code, Section 846.

It is further alleged that this violation involved a mixture and substance containing a detectable amount of 3,4-Methylenedioxy-N-Methylcathinone Hydrochloride, a Schedule I controlled substance.

COUNT 3

On or about May 31, 2013, in Miami-Dade County, in the Southern District of Florida, the defendant,

GIOVANNY BRENES,

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of 3,4-Methylenedioxy-N-Methylcathinone Hydrochloride, a Schedule I controlled substance.

COUNT 4

On or about June 1, 2013, in Miami-Dade County, in the Southern District of Florida, the defendant,

JORGE CANELA, Jr.

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of 3,4-Methylenedioxy-N-Methylcathinone Hydrochloride, a Schedule I controlled substance.

CRIMINAL FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which one or more of the defendants has an interest.

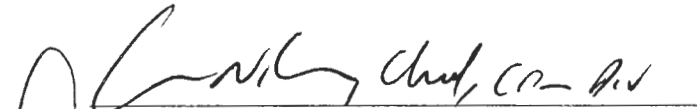
2. Upon conviction of any of the violations alleged in this Indictment, the defendants shall forfeit to the United States any property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of such violations, and any property of the defendants, which was used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations.

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

A TRUE BILL

FOREPERSON

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WIFREDO A. FERRER
UNITED STATES ATTORNEY



MICHAEL P. SULLIVAN
ASSISTANT UNITED STATES ATTORNEY



SHARAD A. MOTIANI
ASSISTANT UNITED STATES ATTORNEY