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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. **14 - 20550** CR-ALTONAGA

21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
18 U.S.C. § 1503
21 U.S.C. § 853

/O'SULLIVAN

UNITED STATES OF AMERICA

vs.

YURI SUCART,
JORGE AGUSTINE VELAZQUEZ,
a/k/a "Ugi,"
CHRISTOPHER BENJAMIN ENGROBA,
JUAN CARLOS NUÑEZ, and
LAZARO DANIEL COLLAZO,
a/k/a "Lazer,"
a/k/a "Laser,"

Defendants.

INDICTMENT

The Grand Jury charges that:

COUNT 1

Beginning in and around October 2008, and continuing through on or about August 6, 2013, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

YURI SUCART,
JORGE AGUSTINE VELAZQUEZ,
a/k/a "Ugi,"
CHRISTOPHER BENJAMIN ENGROBA,
JUAN CARLOS NUÑEZ, and
LAZARO DANIEL COLLAZO,
a/k/a "Lazer,"
a/k/a "Laser,"

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

did knowingly and willfully combine, conspire, confederate, and agree with persons known and unknown to the Grand Jury to distribute a Schedule III controlled substance, that is, the anabolic steroid testosterone, in violation of Title 21, United States Code, Section 841(a)(1).

With respect to the defendants, **YURI SUCART, JORGE AGUSTINE VELAZQUEZ, a/k/a “Ugi,” CHRISTOPHER BENJAMIN ENGROBA, JUAN CARLOS NUÑEZ, and LAZARO DANIEL COLLAZO, a/k/a “Lazer,” a/k/a “Laser,”** 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 substance containing a detectable amount of testosterone, a Schedule III controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(E)(i) and (iii).

COUNT 2

On or about December 14, 2012, in Miami-Dade County, in the Southern District of Florida, the defendants,

**YURI SUCART and
JORGE AGUSTINE VELAZQUEZ,
a/k/a “Ugi,”**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i) and (iii), it is further alleged that this violation involved a mixture and substance containing a detectable amount of testosterone, a Schedule III controlled substance.

COUNT 3

Beginning on or about December 19, 2012, and continuing through on or about December

28, 2012, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**YURI SUCART and
JORGE AGUSTINE VELAZQUEZ,
a/k/a “Ugi,”**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i) and (iii), it is further alleged that this violation involved a mixture and substance containing a detectable amount of testosterone, a Schedule III controlled substance

COUNT 4

On or about February 13, 2013, in Miami-Dade County, in the Southern District of Florida, the defendants,

**YURI SUCART and
JORGE AGUSTINE VELAZQUEZ,
a/k/a “Ugi,”**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i) and (iii), it is further alleged that this violation involved a mixture and substance containing a detectable amount of testosterone, a Schedule III controlled substance.

COUNT 5

On or about March 25, 2013, in Miami-Dade County, in the Southern District of Florida, the defendants,

**YURI SUCART and
JORGE AGUSTINE VELAZQUEZ,
a/k/a “Ugi,”**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i) and (iii), it is further alleged that this violation involved a mixture and substance containing a detectable amount of testosterone, a Schedule III controlled substance.

COUNT 6

On or about April 29, 2013, in Miami-Dade County, in the Southern District of Florida, the defendants,

**YURI SUCART and
JORGE AGUSTINE VELAZQUEZ,
a/k/a “Ugi,”**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i) and (iii), it is further alleged that this violation involved a mixture and substance containing a detectable amount of testosterone, a Schedule III controlled substance.

COUNT 7

On or about August 6, 2013, in Miami-Dade County, in the Southern District of Florida, the defendants,

**JORGE AGUSTINE VELAZQUEZ,
a/k/a “Ugi,” and
CHRISTOPHER BENJAMIN ENGROBA,**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i) and (iii), it is further alleged that this violation involved a mixture and substance containing a detectable amount of testosterone, a Schedule III controlled substance.

COUNT 8

On or about February 4, 2014, in Broward County, in the Southern District of Florida, the defendant,

JORGE AGUSTINE VELAZQUEZ
a/k/a "Ugi,"

did corruptly influence, obstruct, and impede, and endeavor to influence, obstruct, and impede, the due administration of justice, specifically, interfering with a federal grand jury investigation into a conspiracy to distribute a Schedule III controlled substance, that is, the anabolic steroid testosterone, as charged in Count One of this Indictment, by directing C.A. to discard all text messages between the defendant and C.A.; in violation of Title 18, United States Code, Sections 1503 and 2.

FORFEITURE ALLEGATIONS

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

2. Upon conviction of any of the violations alleged in the Indictment, the defendants, shall forfeit to the United States, any property constituting, or derived from, any proceeds which

the defendants obtained, directly or indirectly as a result of such violation, and any property used or intended to be used by the defendants, in any manner or part, to commit or to facilitate the commission of such violation.

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

A TRUE BILL

FOREPERSON

W *W. A. Ferrer, chief, crim Div*
WIFREDO A. FERRER
UNITED STATES ATTORNEY

M. P. Sullivan
MICHAEL P. SULLIVAN
ASSISTANT UNITED STATES ATTORNEY

S. A. Motiani
SHARAD A. MOTIANI
ASSISTANT UNITED STATES ATTORNEY