

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

10 CRIM 737

-v.-

SEALED
INDICTMENT

FELIX TRUJILLO MANRIQUE,
a/k/a "Mocho,"

10 Cr.

Defendant.

x

COUNT ONE

The Grand Jury charges:

1. From at least in or about May 2008, in the Southern District of New York and elsewhere, FELIX TRUJILLO MANRIQUE, a/k/a "Mocho," the defendant, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, and confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that FELIX TRUJILLO MANRIQUE, a/k/a "Mocho," the defendant, and others known and unknown, did and would distribute and possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances involved in the offense were one kilogram and more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A).

OVERT ACT

4. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about September 29, 2008, FELIX TRUJILLO MANRIQUE, a/k/a "Mocho," the defendant, participated in a phone call concerning a heroin transaction.

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

COUNT TWO

The Grand Jury further charges:

5. From at least in or about May 2008, in the Southern District of New York and elsewhere, FELIX TRUJILLO MANRIQUE, a/k/a "Mocho," the defendant, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, and confederate and agree together and with each other to violate the narcotics laws of the United States.

6. It was a part and an object of the conspiracy that FELIX TRUJILLO MANRIQUE, a/k/a "Mocho," the defendant, and others known and unknown, would and did import into the United States from a place outside thereof controlled substances, in violation of Title 21, United States Code, Section 952(a).

7. The controlled substances involved in the offense were one kilogram and more of a mixture and substance containing

a detectable amount of heroin, in violation of Title 21, United States Code, Section 960(b)(1)(A).

OVERT ACT

8. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about September 29, 2008, FELIX TRUJILLO MANRIQUE, a/k/a "Mocho," the defendant, participated in a phone call concerning a heroin transaction.

(Title 21, United States Code, Section 963.)

FORFEITURE ALLEGATION AS TO COUNTS ONE AND TWO

9. As a result of committing the controlled substance offenses alleged in Counts One and Two of this Indictment, FELIX TRUJILLO MANRIQUE, a/k/a "Mocho," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violations 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 Counts One and Two of this Indictment.

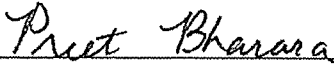
10. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- 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 21, United States Code, Section 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, 853, 963.)


FOREPERSON


PREET BHARARA
United States Attorney