

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>13-412</u>
v.	:	DATE FILED: _____
JOSEPH TORRES, a/k/a “Ramon Laboy,” BERTIN SANCHEZ, EUDDY IZQUIERDO, FRANK FELIX-HERRERA, a/k/a “The Mexican”	: : : : :	VIOLATIONS: 21 U.S.C. § 846 (conspiracy to distribute 1 kilogram or more of heroin - 1 count) 21 U.S.C. § 841(a)(1) (possession with intent to distribute 1 kilogram or more of heroin - 3 counts) 18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From in or about the Spring of 2010 to on or about July 19, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

JOSEPH TORRES,
a/k/a “Ramon Laboy,”
BERTIN SANCHEZ,
EUDDY IZQUIERDO, and
FRANK FELIX-HERRERA,
a/k/a “The Mexican”

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 1 kilogram or more, that is, more than 500 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant JOSEPH TORRES coordinated and supervised the transportation and delivery of heroin, manufactured in Mexico, by a Mexico based heroin distribution organization, into the United States, where he oversaw in Philadelphia, Pennsylvania the distribution of kilogram quantities of heroin by defendant BERTIN SANCHEZ and collected and supervised the storage, transportation and laundering of drug proceeds for the organization, accounted to the leaders of the organization, and ensured that drug proceeds were laundered transmitted, and transported, using various money laundering techniques, to the organization's leadership in Mexico.

3. Defendant BERTIN SANCHEZ received, arranged and supervised the storage and distribution of kilogram to multi-kilogram quantities of heroin distributed by the Mexico based heroin distribution organization's Philadelphia distributors. At the time of defendant SANCHEZ's arrest on July 19, 2013, defendant SANCHEZ had recently distributed approximately 39 kilograms of heroin for the organization for which he was awaiting receipt of, or in the process of receiving, bulk cash payments from Philadelphia area heroin distributors.

4. Defendant EUDDY IZQUIERDO served as a distributor for the Mexican heroin trafficking organization and was responsible for the distribution of multi-kilogram quantities of heroin in the Philadelphia area. At the time of defendant IZQUIERDO's arrest on July 19, 2013, he was found in possession \$105,118.56 in United States currency, representing proceeds of kilogram quantities of heroin he had received as a Philadelphia based distributor for the organization. At times material to this indictment defendant EUDDY IZQUIERDO also served the Mexican heroin distribution organization as a person who coordinated the transfer of

heroin from Mexico and Chicago, Illinois to the Philadelphia, Pennsylvania area, using vehicles with concealed compartments intended for carrying drugs and drug proceeds.

5. Defendant FRANK FELIX-HERRERA served as a distributor for the Mexican heroin trafficking organization and was responsible for the distribution of kilogram to multi-kilogram quantities of heroin in the Philadelphia area. At the time of defendant FELIX-HERRERA's arrest on July 25, 2013, he had received, during June 2013, approximately 2 kilograms of heroin from defendant BERTIN SANCHEZ, had completed partial payment of the approximately \$60,000 to \$62,000 per kilogram owed to the Mexican heroin trafficking organization for the heroin supplied, and was further in possession of documents reflecting that defendant FELIX-HERRERA had made structured wire transfers of United States currency to the leaders of the heroin trafficking organization in Mexico.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants JOSEPH TORRES, BERTIN SANCHEZ, EUDDY IZQUIERDO and FRANK FELIX-HERRERA and others known and unknown to the grand jury, committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere:

1. In or about June 2013, defendant JOSEPH TORRES, using the alias "Ramon Laboy," established utilities service at 3901 City Line Avenue, Apartment #1023 A, Philadelphia, Pennsylvania, the Mexico based heroin distribution organization's Philadelphia heroin stash location.

2. On or about June 5, 2013, defendant BERTIN SANCHEZ distributed approximately 2 kilograms of heroin to defendant FRANK FELIX-HERRERA at a location in Philadelphia, Pennsylvania, on short term credit, with the understanding that defendant FELIX-

HERRERA would complete payment of approximately \$60,000 to \$62,000 per kilogram sold within the approximately two week period following the delivery of the heroin to defendant FELIX-HERRERA.

3. From on or about June 3, 2013, to on or about July 19, 2013, defendant BERTIN SANCHEZ distributed approximately 21 kilograms of heroin to defendant EUDDY IZQUIERDO in Philadelphia, Pennsylvania, on short term credit, with the understanding that defendant EUDDY IZQUIERDO would complete payment of approximately \$60,000 to \$62,000 per kilogram sold within the approximately two week period following the delivery of the heroin to defendant EUDDY IZQUIERDO.

4. On or about July 2, 2013, defendant BERTIN SANCHEZ entered the organization's Philadelphia heroin stash location at 3901 City Line Avenue, Apartment #1023 A, Philadelphia, Pennsylvania and exited the aforesaid apartment carrying a shopping bag which he then placed in the trunk of a gray 2005 Volkswagen Jetta, bearing PA registration plate JGP 2724.

5. On or about July 18, 2013, defendant BERTIN SANCHEZ, after observing law enforcement surveillance in the vicinity of the organization's Philadelphia heroin stash location at 3901 City Line Avenue, Apartment #1023 A, Philadelphia, Pennsylvania, engaged in erratic "counter-surveillance" driving techniques, and eventually abandoned his vehicle, a gray 2005 Volkswagen Jetta, bearing PA registration plate JGP 2724, in the vicinity of 100 E. Mentor Street, Philadelphia, Pennsylvania.

6. On or about July 19, 2013, defendant BERTIN SANCHEZ, driven by defendant EUDDY IZQUIERDO, in a white 2009 Acura TL sedan, bearing Pennsylvania registration K09-779K, returned to the vicinity of 100 E. Mentor Street, in Philadelphia, where

SANCHEZ had left the 2005 Volkswagen Jetta on the previous day.

7. On or about July 19, 2013, at the time defendant EUDDY IZQUIERDO dropped off defendant BERTIN SANCHEZ at the location he had left his 2005 Volkswagen Jetta, defendant IZQUIERDO was in possession of approximately \$105,118.56, representing heroin trafficking proceeds, which were intended to defray the balance owed by defendant IZQUIERDO to the Mexico based heroin organization for heroin he had received on credit.

8. On or about July 19, 2013, defendant JOSEPH TORRES was present at 7801 Roosevelt Boulevard, Apartment #36, Philadelphia, Pennsylvania, an apartment used by the Mexico based heroin trafficking organization to collect and store bulk sums of United States currency representing proceeds of the organization's Philadelphia heroin trafficking activities, and was found to be in possession of \$19,319 in United States currency, representing drug proceeds, as well as a smashed electronic money counter and a heat sealer used in the packaging of drug proceeds. In addition, on the same date, defendant TORRES was found to be in possession and control of a black Saturn automobile, bearing Pennsylvania registration JHY-4650, which contained a hidden, electronically controlled compartment that contained \$89,920 in United States currency.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From on about June 3, 2013 to on or about July 19, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

EUDDY IZQUIERDO

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 21 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On about June 5, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**FRANK FELIX-HERRERA,
a/k/a “The Mexican,”**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 2 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 19, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JOSEPH TORRES,
a/k/a “Ramon Laboy,” and
BERTIN SANCHEZ**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 12 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

1. As a result of the violations of Title 21, United States Code, Section 846, set forth in this indictment, defendants

**JOSEPH TORRES,
a/k/a “Ramon Laboy,”
BERTIN SANCHEZ,
EUDDY IZQUIERDO, and
FRANK FELIX,
a/k/a “The Mexican,”**

shall forfeit to the United States of America:

(a) Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense, including, but not limited to, the sums of \$105,118.56, \$19,319, \$89,920, and \$2,424 in United States currency; and

(b) Any property constituting, or derived from, any proceeds obtained directly or indirectly from the commission of such offense, including the sums of \$105,118.56, \$19,319, \$89,920, and \$2,424 in United States currency.

2. If any of the property described above as being subject to forfeiture, as a result of any act of 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.

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

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney