

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

SEALED  
INDICTMENT

ANDY SOSA,  
a/k/a "Sosa Gucci Prada,"

MICKY VALDEZ,  
a/k/a "Mikey,"

NELSON VERAS,  
a/k/a "Monkey,"  
a/k/a "Monkey White,"

OSCAR ALMANZAR,  
a/k/a "Heavy,"

JIMMY KELLY,  
AKBAR HUSSAIN,

a/k/a "AK,"

DARWIN AYALA,  
a/k/a "Fatulo,"

JOSHUEL RODRIGUEZ,  
a/k/a "Alpa,"

MIGUEL CARELA,  
a/k/a "Bone,"  
a/k/a "Bonet,"

JUSTIN RAMIREZ,  
a/k/a "E.T.,"

JAMES PAULINO,  
LUCAS CHAJECKI,

a/k/a "Luc,"

OMAUERIS CABRERA,  
a/k/a "Oh Boy,"

EDWIN MERCEDES,  
a/k/a "Mela,"  
a/k/a "Melasas,"

CHRISTOPHER PEREZ,  
a/k/a "Flaco,"

ARGENIS RODRIGUEZ,  
ISMEAL VASQUEZ,

a/k/a "Ish,"

MICHAEL ALVARADO,  
a/k/a "Dirt,"

JORGE ARTILES,  
ARGENIS HENRIQUEZ,  
a/k/a "Shysty,"

Defendants.

----- X

COUNT ONE

The Grand Jury charges:

1. From at least in or about 2009, up to and including on or about July 14, 2014, in the Southern District of New York and elsewhere, ANDY SOSA, a/k/a "Sosa Gucci Prada," MICKEY VALDEZ, a/k/a "Mikey," NELSON VERAS, a/k/a "Monkey," a/k/a "Monkey White," OSCAR ALMANZAR, a/k/a "Heavy," JIMMY KELLY, AKBAR HUSSAIN, a/k/a "AK," DARWIN AYALA, a/k/a "Fatulo," JOSHUEL RODRIGUEZ, a/k/a "Alpa," MIGUEL CARELA, a/k/a "Bone," a/k/a "Bonet," JUSTIN RAMIREZ, a/k/a "E.T.," JAMES PAULINO, LUCAS CHAJECKI, a/k/a "Luc," OMAURIS CABRERA, a/k/a "Oh Boy," EDWIN MERCEDES, a/k/a "Mela," a/k/a "Melasas," CHRISTOPHER PEREZ, a/k/a "Flaco," ARGENIS RODRIGUEZ, ISMEAL VASQUEZ, a/k/a "Ish," MICHAEL ALVARADO, a/k/a "Dirt," JORGE ARTILES, and ARGENIS HENRIQUEZ, a/k/a "Shysty," 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.

2. It was a part and an object of the conspiracy that ANDY SOSA, a/k/a "Sosa Gucci Prada," MICKEY VALDEZ, a/k/a "Mikey," NELSON VERAS, a/k/a "Monkey," a/k/a "Monkey White," OSCAR ALMANZAR, a/k/a "Heavy," JIMMY KELLY, AKBAR HUSSAIN, a/k/a "AK," DARWIN AYALA, a/k/a "Fatulo," JOSHUEL RODRIGUEZ, a/k/a "Alpa," MIGUEL CARELA, a/k/a "Bone," a/k/a "Bonet," JUSTIN

RAMIREZ, a/k/a "E.T.," JAMES PAULINO, LUCAS CHAJECKI, a/k/a "Luc," OMAURIS CABRERA, a/k/a "Oh Boy," EDWIN MERCEDES, a/k/a "Mela," a/k/a "Melasas," CHRISTOPHER PEREZ, a/k/a "Flaco," ARGENIS RODRIGUEZ, ISMEAL VASQUEZ, a/k/a "Ish," MICHAEL ALVARADO, a/k/a "Dirt," JORGE ARTILES, and ARGENIS HENRIQUEZ, a/k/a "Shysty," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substances that ANDY SOSA, a/k/a "Sosa Gucci Prada," MICKEY VALDEZ, a/k/a "Mikey," NELSON VERAS, a/k/a "Monkey," a/k/a "Monkey White," OSCAR ALMANZAR, a/k/a "Heavy," JIMMY KELLY, AKBAR HUSSAIN, a/k/a "AK," DARWIN AYALA, a/k/a "Fatulo," JOSHUEL RODRIGUEZ, a/k/a "Alpa," MIGUEL CARELA, a/k/a "Bone," a/k/a "Bonet," JUSTIN RAMIREZ, a/k/a "E.T.," JAMES PAULINO, LUCAS CHAJECKI, a/k/a "Luc," OMAURIS CABRERA, a/k/a "Oh Boy," EDWIN MERCEDES, a/k/a "Mela," a/k/a "Melasas," CHRISTOPHER PEREZ, a/k/a "Flaco," ARGENIS RODRIGUEZ, ISMEAL VASQUEZ, a/k/a "Ish," MICHAEL ALVARADO, a/k/a "Dirt," JORGE ARTILES, and ARGENIS HENRIQUEZ, a/k/a "Shysty," the defendants, conspired to distribute and possess with the intent to distribute were: (a) 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, in violation of 21 U.S.C. § 841(b)(1)(A); (2) 280 grams and more of mixtures and

substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of 21 U.S.C. § 841(b)(1)(A); (3) 1 kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b)(1)(A); (4) 50 kilograms and more of marijuana, in violation of 21 U.S.C. § 841(b)(1)(C); (5) a quantity of mixtures and substances containing oxycodone, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(b)(1)(C); and (6) a quantity of mixtures and substances containing suboxone, a Schedule III controlled substance, in violation of 21 U.S.C. § 841(b)(1)(E).

#### MEANS AND METHODS OF THE CONSPIRACY

4. At all times relevant to this Indictment, a criminal organization known as the "Trinitarios" (the "Trinitarios" or the "Gang"), comprised primarily of individuals of Dominican descent, was operating in, among other locations, the Fordham and Kingsbridge neighborhoods of the Bronx, New York. The Trinitarios operating in these neighborhoods during this time period were members of two related "sets," or factions of the Gang, called the "18 Treys" and "Greenbridge." Members of the 18 Treys and Greenbridge sets, and their associates, committed acts of violence, such as shootings, against rival gangs - such as the "Eden Boys" gang - in order to protect their drug-

trafficking operation, and to protect fellow members and associates of the Trinitarios.

5. During all of part of the period relevant to this Indictment, members and associates of the 18 Treys and Greenbridge sets controlled drug trafficking in the Fordham and Kingsbridge neighborhoods of the Bronx. ANDY SOSA, a/k/a "Sosa Gucci Prada," and NELSON VERAS, a/k/a "Monkey," a/k/a "Monkey White," the defendants, were leaders of the Trinitarios in these neighborhoods. MICKEY VALDEZ, a/k/a "Mikey," the defendant, was one of the shooters on behalf of the Gang, enforcing the Gang's control over these neighborhoods, as well as the Gang's drug trafficking, through violence.

#### OVERT ACTS

6. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. From at least on or about May 7, 2014, up to and including on or about June 24, 2014, ANDY SOSA, a/k/a "Sosa Gucci Prada," the defendant, sold a co-conspirator not named in this Indictment ("CC-1") approximately 250 grams of heroin in the Bronx, New York, including 80 grams of heroin on May 15, 2014.

b. On or about October 20, 2010, MICKEY VALDEZ, a/k/a "Mikey," the defendant, sold a quantity of crack to an undercover police officer ("UC-1") in the vicinity of West 183<sup>rd</sup> Street in the Bronx, New York.

c. On or about May 19, 2014, NELSON VERAS, a/k/a "Monkey," a/k/a "Monkey White," the defendant, sold approximately 9 glassine bags of heroin to an undercover police officer ("UC-2") in the vicinity of Webb Avenue in the Bronx, New York.

d. On or about December 22, 2013, OSCAR ALMANZAR, a/k/a "Heavy," the defendant, possessed 20 bags of crack in the vicinity of Aqueduct Avenue in the Bronx, New York.

e. On or about January 29, 2013, JIMMY KELLY, the defendant, possessed approximately 55 glassine bags of heroin in the vicinity of Audobon Avenue in New York, New York.

f. On or about December 15, 2013, AKBAR HUSSEIN, a/k/a "AK," the defendant, sent a text message to OSCAR ALMANZAR, the defendant, agreeing to sell ALMANZAR a quantity of suboxone.

g. On or about December 29, 2011, DARWIN AYALA, a/k/a "Fatulo," the defendant, possessed two bags of marijuana in the vicinity of West Kingsbridge Road in the Bronx, New York.

h. In or about the Fall of 2011, JOSHUEL RODRIGUEZ, a/k/a "Alpa," the defendant, asked for and obtained a gun from a

co-conspirator not named in this Indictment ("CC-2") in the vicinity of Webb Avenue in the Bronx, New York.

i. On or about November 29, 2009, MIGUEL CARELA, a/k/a "Bone," a/k/a "Bonet," the defendant, possessed a black handgun in the vicinity of 180<sup>th</sup> Street and Anthony Avenue in the Bronx, New York.

j. On or about June 29, 2014, JUSTIN RAMIREZ, a/k/a "E.T.," the defendant, possessed two handguns in the vicinity of East Clarke Place in the Bronx, New York.

k. On or about June 20, 2011, JAMES PAULINO, the defendant, sold marijuana in the vicinity of Webb Avenue in the Bronx, New York.

l. On or about June 11, 2013, LUCAS CHAJECKI, a/k/a "Luc," the defendant, sold a quantity of crack to an undercover police officer ("UC-3") in the vicinity of West 192<sup>nd</sup> Street in the Bronx, New York.

m. On or about January 9, 2013, OMAURIS CABRERA, a/k/a "Oh Boy," the defendant, sold a quantity of marijuana to an undercover police officer ("UC-4") in the vicinity of University Avenue in the Bronx, New York.

n. On or about April 30, 2014, EDWIN MERCEDES, a/k/a "Mela," a/k/a "Melasas," the defendant, possessed a quantity of cocaine and crack in the vicinity of Webster Avenue in the Bronx, New York.

o. On or about May 19, 2014, CHRISTOPHER PEREZ, a/k/a "Flaco," the defendant, sold approximately 9 glassine bags of heroin to UC-2 in the vicinity of Webb Avenue in the Bronx, New York.

p. On or about May 13, 2014, ARGENIS RODRIGUEZ, the defendant, possessed approximately 60 bags of crack in the vicinity of West Kingsbridge Road in the Bronx, New York.

q. On or about November 11, 2010, ISMEAL VASQUEZ, a/k/a "Ish," the defendant, attempted to sell a quantity of heroin in the vicinity of Grand Avenue in the Bronx, New York.

r. On or about April 15, 2014, MICHAEL ALVARADO, a/k/a "Dirt," the defendant, sent a text message to ARGENIS RODRIGUEZ, the defendant, to arrange a sale of marijuana.

s. On or about October 8, 2013, JORGE ARTILES, the defendant, sold approximately 11 bags of cocaine to UC-2.

t. On or about August 12, 2011, ARGENIS HENRIQUEZ, a/k/a "Shysty," the defendant, spoke by telephone to a co-conspirator not named in this Indictment ("CC-3") to arrange a marijuana sale.

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

COUNT TWO

The Grand Jury further charges:

7. From at least in or about 2009, up to and including on or about July 14, 2014, in the Southern District of New York and



elsewhere, ANDY SOSA, a/k/a "Sosa Gucci Prada," MICKEY VALDEZ, a/k/a "Mikey," NELSON VERAS, a/k/a "Monkey," a/k/a "Monkey White," JOSHUEL RODRIGUEZ, a/k/a "Alpa," MIGUEL CARELA, a/k/a "Bone," a/k/a "Bonet," and JUSTIN RAMIREZ, a/k/a "E.T.," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy 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 brandished and discharged.

(Title 18, United States Code, Section 924(c)(1)(A)(iii).)

FORFEITURE ALLEGATION

8. As a result of committing the controlled substance offense charged in Count One of this Indictment, ANDY SOSA, a/k/a "Sosa Gucci Prada," MICKEY VALDEZ, a/k/a "Mikey," NELSON VERAS, a/k/a "Monkey," a/k/a "Monkey White," OSCAR ALMANZAR, a/k/a "Heavy," JIMMY KELLY, AKBAR HUSSAIN, a/k/a "AK," DARWIN AYALA, a/k/a "Fatulo," JOSHUEL RODRIGUEZ, a/k/a "Alpa," MIGUEL CARELA, a/k/a "Bone," a/k/a "Bonet," JUSTIN RAMIREZ, a/k/a "E.T.," JAMES PAULINO, LUCAS CHAJECKI, a/k/a "Luc," OMAURIS CABRERA, a/k/a "Oh Boy," EDWIN MERCEDES, a/k/a "Mela," a/k/a "Melasas," CHRISTOPHER PEREZ, a/k/a "Flaco," ARGENIS RODRIGUEZ, ISMEAL VASQUEZ, a/k/a "Ish," MICHAEL ALVARADO, a/k/a "Dirt,"

JORGE ARTILES, and ARGENIS HENRIQUEZ, a/k/a "Shysty," the defendants, 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 defendant obtained directly or indirectly as a result of the offense 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 offense charged in Count One of this Indictment.

Substitute Assets Provision

9. If any of the above-described forfeitable property, as a result of any act or omission of ANDY SOSA, a/k/a "Sosa Gucci Prada," MICKEY VALDEZ, a/k/a "Mikey," NELSON VERAS, a/k/a "Monkey," a/k/a "Monkey White," OSCAR ALMANZAR, a/k/a "Heavy," JIMMY KELLY, AKBAR HUSSAIN, a/k/a "AK," DARWIN AYALA, a/k/a "Fatulo," JOSHUEL RODRIGUEZ, a/k/a "Alpa," MIGUEL CARELA, a/k/a "Bone," a/k/a "Bonet," JUSTIN RAMIREZ, a/k/a "E.T.," JAMES PAULINO, LUCAS CHAJECKI, a/k/a "Luc," OMAURIS CABRERA, a/k/a "Oh Boy," EDWIN MERCEDES, a/k/a "Mela," a/k/a "Melasas," CHRISTOPHER PEREZ, a/k/a "Flaco," ARGENIS RODRIGUEZ, ISMEAL VASQUEZ, a/k/a "Ish," MICHAEL ALVARADO, a/k/a "Dirt," JORGE ARTILES, and ARGENIS HENRIQUEZ, a/k/a "Shysty," 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;

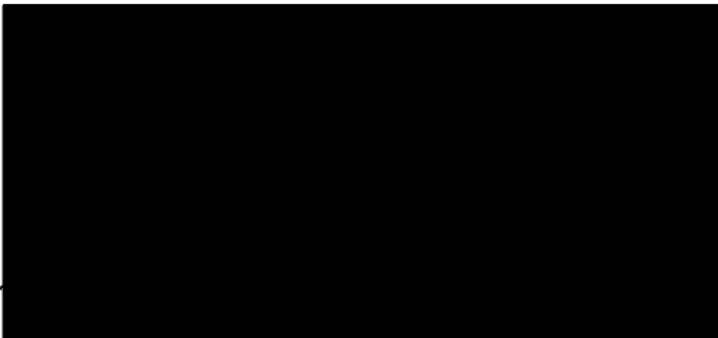
c. has been placed beyond the jurisdiction of the Court;

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 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)



Preet Bharara  
PREET BHARARA *PK*  
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. -

ANDY SOSA, a/k/a "Sosa Gucci Prada,"  
MICKEY VALDEZ, a/k/a "Mikey," NELSON  
VERAS, a/k/a "Monkey," a/k/a "Monkey  
White," OSCAR ALMANZAR, a/k/a "Heavy,"  
JIMMY KELLY, AKBAR HUSSAIN, a/k/a "AK,"  
DARWIN AYALA, a/k/a "Fatulo," JOSHUEL  
RODRIGUEZ, a/k/a "Alpa," MIGUEL CARELA,  
a/k/a "Bone," a/k/a "Bonet," JUSTIN  
RAMIREZ, a/k/a "E.T.," JAMES PAULINO,  
LUCAS CHAJECKI, a/k/a "Luc," OMAURIS  
CABRERA, a/k/a "Oh Boy," EDWIN MERCEDES,  
a/k/a "Mela," a/k/a "Melasas,"  
CHRISTOPHER PEREZ, a/k/a "Flaco,"  
ARGENIS RODRIGUEZ, ISMEAL VASQUEZ, a/k/a  
"Ish," MICHAEL ALVARADO, a/k/a "Dirt,"  
JORGE ARTILES, and ARGENIS HENRIQUEZ,  
a/k/a "Shysty,"

Defendants.

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INDICTMENT

14 Cr. \_\_\_\_ ( )

(18 U.S.C. §§ 924(c)(1)(A)(iii) and 2;  
21 U.S.C. § 846.)

PREET BHARARA

United States Attorney.

