



THE ENTERPRISE

1. At all times relevant to this Indictment, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," JOSE MANUEL ESPINAL, THEODORE JONES, a/k/a "Derrick Miles," a/k/a "Theo," a/k/a "Tito," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," OSCAR RODRIGUEZ, a/k/a "Elias Rodriguez," a/k/a "Chang," a/k/a "Chan," and JESUS SANCHEZ, the defendants, and others known and unknown, were members of a criminal organization (the "Rodriguez Organization," or the "Enterprise") whose members and associates engaged in, among other activities, narcotics trafficking, murder, attempted murder, money laundering, unlicensed money transmitting, and bank fraud. The Rodriguez Organization operated primarily in the Washington Heights and Inwood neighborhoods of Upper Manhattan, in New York City, but also invested in property and laundered money in, among other places, New York, Florida, and the Dominican Republic.

2. The Rodriguez Organization, including its leadership, its membership, and its associates, constituted an "enterprise," as defined by Title 18, United States Code, Section

1961(4), that is, a group of individuals associated in fact, although not a legal entity. The Enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. At all times relevant to this Indictment, the Rodriguez Organization was engaged in, and its activities affected, interstate and foreign commerce.

3. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, was the leader of the Enterprise, and directed other members and associates of the Enterprise in carrying out unlawful and other activities in furtherance of the conduct of the Enterprise's affairs. RODRIGUEZ-PEREZ, and others known and unknown, participated in the operation and management of the Enterprise, and participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

4. FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendant, participated in the operation and management of the Enterprise, and participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

5. MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," the defendant, participated in unlawful and other activities in furtherance of

the conduct of the Enterprise's affairs.

6. JOSE MANUEL ESPINAL, the defendant, directed other members and associates of the Enterprise in carrying out unlawful and other activities in furtherance of the conduct of the Enterprise's affairs. ESPINAL, and others known and unknown, participated in the operation and management of the Enterprise, and participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

7. THEODORE JONES, a/k/a "Derrick Miles," a/k/a "Theo," a/k/a "Tito," the defendant, participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

8. JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," the defendant, directed other members and associates of the Enterprise in carrying out unlawful and other activities in furtherance of the conduct of the Enterprise's affairs. RODRIGUEZ, and others known and unknown, participated in the operation and management of the Enterprise, and participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

9. OSCAR RODRIGUEZ, a/k/a "Elias Rodriguez," a/k/a "Chang," a/k/a "Chan," the defendant, participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

10. ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendant, directed other members of the Enterprise in carrying out unlawful and other activities in furtherance of the conduct of the Enterprise's affairs. ORLANDO RODRIGUEZ participated in the operation and management of the Enterprise, and participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

11. JESUS SANCHEZ, the defendant, directed other members and associates of the Enterprise in carrying out unlawful and other activities in furtherance of the conduct of the Enterprise's affairs. SANCHEZ, and others known and unknown, participated in the operation and management of the Enterprise, and participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

PURPOSES OF THE ENTERPRISE

12. The purposes of the Enterprise included, but were not limited to, the following:

a. Enriching the members and associates of the Enterprise through, among other things, the distribution and sale of narcotics, including marijuana.

b. Preserving and protecting the power, territory, and profits of the Enterprise through murder, attempted murder, other acts of violence, and threats of violence.

c. Promoting and enhancing the Enterprise and the activities of its members and associates.

d. Investing the proceeds of the Enterprise in, among other things, real estate in New York, Florida, and the Dominican Republic.

e. Laundering and illegally transmitting narcotics proceeds.

f. Committing bank fraud.

g. Tampering with witnesses and obstructing justice.

#### MEANS AND METHODS OF THE ENTERPRISE

13. Among the means and methods employed by the members and associates of the Rodriguez Organization in conducting and participating in the conduct of the affairs of the Enterprise were the following:

a. Members and associates of the Enterprise committed, conspired, attempted, and threatened to commit acts of violence, including murder, to protect and expand the Enterprise's criminal operations, including the wholesale and retail distribution of marijuana.

b. Members and associates of the Enterprise used threats of violence and physical violence, including murder and attempted murder, against various people involved in the illegal narcotics business, including in particular rival narcotics

traffickers, competitors, and individuals who stole narcotics proceeds from the Enterprise, in order to further the Enterprise's narcotics trafficking activities.

c. Members and associates of the Enterprise operated a narcotics business that distributed large quantities of marijuana.

d. Members and associates of the Enterprise transported and transmitted narcotics proceeds from, among other places, New York to, among other places, Florida and the Dominican Republic.

e. Members and associates of the Enterprise invested narcotics proceeds in real estate in New York, Florida, and the Dominican Republic.

f. Members and associates of the Enterprise made misrepresentations on applications for loans and mortgages for real estate and other property in New York and in Florida.

g. Members and associates of the Enterprise tampered with witnesses and obstructed justice, and conspired and attempted to do the same.

#### THE RACKETEERING VIOLATION

14. From at least in or about 1996, up to and including in or about 2012, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty,"

a/k/a "El Monstro," FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," JOSE MANUEL ESPINAL, JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," and JESUS SANCHEZ, the defendants, being persons employed by and associated with the enterprise described above, to wit, the Rodriguez Organization, which was engaged in, and the activities of which affected, interstate and foreign commerce, knowingly conducted and participated, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, that is, through the commission of the following acts of racketeering:

THE PATTERN OF RACKETEERING ACTIVITY

15. The pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisted of the following acts:

Racketeering Act One:  
Narcotics Trafficking Conspiracy

16. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," and JESUS SANCHEZ, the defendants, committed the following act, which constitutes the commission of Racketeering

Act One:

17. From at least in or about 1996, up to and including in or about 2011, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," and JESUS SANCHEZ, 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, in violation of Title 21, United States Code, Section 846.

18. It was a part and an object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," and JESUS SANCHEZ, the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

19. The controlled substance involved in the offense

was 1,000 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Sections 812, 841(a)(1), and 841(b)(1)(A) of Title 21, United States Code.

Racketeering Act Two:  
Attempted Murder of  
Victim-1

20. ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendant, committed the following act, which constitutes the commission of Racketeering Act Two:

21. On or about July 16, 1996, in the Southern District of New York, ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," intentionally and knowingly did attempt to murder and aid and abet the attempted murder of an individual ("Victim-1") who was engaged in a dispute with MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, in violation of New York Penal Law Sections 125.25, 110.00, and 20.00, in that, with the intent to cause the death of Victim-1, RODRIGUEZ shot at Victim-1 in the vicinity of 48 Post Avenue, New York, New York, but did not cause his death.

Racketeering Act Three:  
Conspiracy to Murder and Murder of  
Francisco Perez, a/k/a "Francisco Rodriguez,"  
a/k/a "Frank Diaz," a/k/a "Francie"

22. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, committed the following acts, any one of which alone constitutes the commission of Racketeering Act Three:

(A) Conspiracy to Murder Francisco Perez, a/k/a "Francisco Rodriguez," a/k/a "Frank Diaz," a/k/a "Francie"

23. From in or about 1997, up through and included on or about October 26, 1997, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, and others known and unknown, intentionally and knowingly conspired to murder Francisco Perez, a/k/a "Francisco Rodriguez," a/k/a "Frank Diaz," a/k/a "Francie," in violation of New York Penal Law, Sections 125.25 and 105.15, in that, with the intent to cause the death of Perez, RODRIGUEZ-PEREZ and at least one other individual not named as a defendant herein agreed together and with each other to cause the death of Perez.

Overt Act

a. On or about October 26, 1997, a co-conspirator of RODRIGUEZ-PEREZ shot and killed Perez in the

vicinity of 3845 10th Avenue, New York, New York.

(B) Murder of Francisco Perez, a/k/a "Francisco Rodriguez," a/k/a "Frank Diaz," a/k/a "Francie"

24. On or about October 26, 1997, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, and others known and unknown, intentionally and knowingly did murder and aid and abet the murder of Francisco Perez, a/k/a "Francisco Rodriguez," a/k/a "Frank Diaz," a/k/a "Francie," in violation of New York Penal Law, Sections 125.25 and 20.00, in that, with the intent to cause the death of Perez, RODRIGUEZ-PEREZ solicited a co-conspirator not named as a defendant herein to shoot and kill Perez in the vicinity of 3845 10th Avenue, New York, New York.

Racketeering Act Four:  
Conspiracy to Murder and Murder of  
Antonio Kasse, a/k/a "Antonio Kasse Checo,"  
a/k/a "Antonio Casse," a/k/a "Rafael Alveraz,"  
a/k/a "Toasty," a/k/a "Tony" and Attempted Murder of Victim-2

25. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, committed the following acts, any one of which alone constitutes the commission of Racketeering Act Four:

(A) Conspiracy to Murder and Murder of Antonio Kasse, a/k/a "Antonio Kasse Checo," a/k/a "Antonio Casse," a/k/a "Rafael Alveraz," a/k/a "Toasty," a/k/a "Tony"

26. From in or about 1998, up through and including on or about December 13, 1998, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, and others known and unknown, intentionally and knowingly conspired to murder Antonio Kasse, a/k/a "Antonio Kasse Checo," a/k/a "Antonio Casse," a/k/a "Rafael Alveraz," a/k/a "Toasty," a/k/a "Tony," in violation of New York Penal Law, Sections 125.25 and 105.15, in that, with the intent to cause the death of Kasse, RODRIGUEZ-PEREZ and at least one other individual not named as a defendant herein agreed together and with each other to cause the death of Kasse.

Overt Act

a. On or about December 13, 1998, a co-conspirator of RODRIGUEZ-PEREZ shot and killed Kasse in the vicinity of 165 Nagle Avenue, New York, New York, during which shooting another individual, Victim-2, was also shot, but not killed.

(B) Murder of Antonio Kasse, a/k/a "Antonio Kasse Checo," a/k/a "Antonio Casse," a/k/a "Rafael Alveraz," a/k/a "Toasty," a/k/a "Tony"

27. On or about December 13, 1998, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a

"Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, and others known and unknown, intentionally and knowingly did murder and aid and abet the murder of Antonio Kasse, a/k/a "Antonio Kasse Checo," a/k/a "Antonio Casse," a/k/a "Rafael Alveraz," a/k/a "Toasty," a/k/a "Tony," in violation of New York Penal Law, Sections 125.25 and 20.00, in that, with the intent to cause the death of Kasse, RODRIGUEZ-PEREZ solicited a co-conspirator not named as a defendant herein to shoot and kill Kasse in the vicinity of 165 Nagle Avenue, New York, New York.

(C) Attempted Murder of Victim-2

28. On or about December 13, 1998, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, intentionally and knowingly attempted to murder and aided and abetted the attempted murder of Victim-2 in the vicinity of 165 Nagle Avenue, New York, New York, in violation of New York Penal Law, Sections 125.25, 110.00, and 20.00, in that, with the intent to cause the death of Antonio Kasse, a/k/a "Antonio Kasse Checo," a/k/a "Antonio Casse," a/k/a "Rafael Alveraz," a/k/a "Toasty," a/k/a "Tony," RODRIGUEZ-PEREZ, and others known and unknown, did engage in conduct that tended to effect the commission of such murder, and did aid and abet one another in attempting to engage in such conduct, which resulted in the shooting of Victim-2.

Racketeering Act Five:  
Conspiracy to Murder and Attempted Murder of  
Victim-3

29. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, committed the following acts, any one of which alone constitutes the commission of Racketeering Act Five:

(A) Conspiracy to Murder Victim-3

30. From in or about 1998, up through and including on or about January 18, 1999, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, and others known and unknown, knowingly conspired to murder Victim-3 in violation of New York Penal Law, Sections 125.25 and 105.15, in that, with the intent to cause the death of Victim-3, RODRIGUEZ-PEREZ and at least one other individual not named as a defendant herein agreed together and with each other to cause the death of Victim-3.

Overt Act

a. On or about January 18, 1999, a co-conspirator of RODRIGUEZ-PEREZ shot Victim-3 in the vicinity of the intersection of Nagle Avenue and Dyckman Street, New York, New York.

(B) Attempted Murder of Victim-3

31. On or about January 18, 1999, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, intentionally and knowingly attempted to murder and aided and abetted the attempted murder of Victim-3 in the vicinity of Nagle Avenue and Dyckman Street, New York, New York, in violation of New York Penal Law, Sections 125.25, 110.00, and 20.00, in that, with the intent to cause the death of Victim-3, RODRIGUEZ-PEREZ, and others known and unknown, did engage in conduct that tended to effect the commission of such murder, and did aid and abet one another in attempting to engage in such conduct.

Racketeering Act Six:  
Conspiracy to Murder and Murder of  
FNU LNU, a/k/a "Carlos Valentin," a/k/a "Campesino,"  
a/k/a "Campi"

32. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, committed the following acts, any one of which alone constitutes the commission of Racketeering Act Six:

(A) Conspiracy to Murder FNU LNU, a/k/a "Carlos Valentin,"  
a/k/a "Campesino," a/k/a "Campi,"

33. In or about 2000, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, and others known and unknown, intentionally and knowingly conspired to murder FNU LNU, a/k/a "Carlos Valentin," a/k/a "Campesino," a/k/a "Campi" ("Campi") in violation of New York Penal Law, Sections 125.25 and 105.15, in that, with the intent to cause the death of Campi, RODRIGUEZ-PEREZ and RODRIGUEZ agreed together and with each other to cause the death of Campi.

Overt Act

a. In or about 2000, RODRIGUEZ strangled Campi to death in the vicinity of Riverdale Park, in the Bronx, New York, at the direction of RODRIGUEZ-PEREZ.

(B) Murder of FNU LNU, a/k/a "Carlos Valentin,"  
a/k/a "Campesino," a/k/a "Campi"

34. In or about 2000, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendant, intentionally and knowingly did murder and aid and abet the murder of FNU LNU, a/k/a "Carlos

Valentin," a/k/a "Campesino," a/k/a "Campi" ("Campi") in violation of New York Penal Law, Sections 125.25 and 20.00, in that, with the intent to cause the death of Campi, RODRIGUEZ strangled Campi to death in the vicinity of Riverdale Park, in the Bronx, New York, at the direction of RODRIGUEZ-PEREZ.

**Racketeering Act Seven:**  
**Conspiracy to Murder and Murder of**  
**Wilfredo Molina, a/k/a "Willie"**

35. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, committed the following acts, any one of which alone constitutes the commission of Racketeering Act Seven:

**(A) Conspiracy to Murder Wilfredo Molina, a/k/a "Willie"**

36. From at least in or about 2004, up to and including on or about May 3, 2004, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, intentionally and knowingly conspired to murder Wilfredo Molina, a/k/a "Willie," in violation of New Jersey Statutes 2C:11-3 and 2C:2-6(b)(4) in that, with the intent to cause the death of Molina, RODRIGUEZ-PEREZ and FELIPE CANTRES-SANJURJO, and others

known and unknown, agreed together and with each other to purposely cause the death of Molina.

Overt Act

a. On or about May 3, 2004, at the direction of RODRIGUEZ-PEREZ and of a co-conspirator not named as a defendant herein ("CC-1"), and with the assistance of MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," the defendant, FELIPE CANTRES-SANJURJO shot and killed Molina in the vicinity of Englewood, New Jersey.

(B) Murder of Wilfredo Molina, a/k/a "Willie"

37. On or about May 3, 2004, in the District of New Jersey, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, intentionally and knowingly did murder and aid and abet the murder of Wilfredo Molina, a/k/a "Willie," in violation of New Jersey Statutes 2C:11-3 and 2C:2-6(c), in that, with the intent to cause the death of Molina, and at the direction of RODRIGUEZ-PEREZ and of CC-1, and with the assistance of MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," the defendant, FELIPE CANTRES-SANJURJO shot and purposely caused the death of Molina in the vicinity of Englewood, New Jersey.

Racketeering Act Eight:  
Conspiracy to Murder and Attempted Murder of  
Victim-4

38. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, and others known and unknown, committed the following acts, any one of which alone constitutes the commission of Racketeering Act Eight:

(A) Conspiracy to Murder Victim-4

39. From at least in or about 2005, up to and including on or about April 25, 2005, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, and others known and unknown, intentionally and knowingly conspired to murder Victim-4, in violation of New York Penal Law, Sections 125.25 and 105.15, in that, with the intent to cause the death of Victim-4, RODRIGUEZ-PEREZ agreed with others to cause the death of Victim-4.

Overt Act

a. On or about April 25, 2005, at the direction of RODRIGUEZ-PEREZ and of CC-1, MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," the defendant, shot Victim-4 in the vicinity of 1001 39th Street, Brooklyn, New York, but did not kill him.

(B) Attempted Murder of Victim-4

40. On or about April 25, 2005, in the Eastern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, and others known and unknown, intentionally and knowingly did attempt to murder and aid and abet the attempted murder of Victim-4, in violation of New York Penal Law Sections 125.25, 110.00, and 20.00, in that, with the intent to cause the death of Victim-4, and at the direction of RODRIGUEZ-PEREZ, and of CC-1, MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," the defendant, shot Victim-4 in the vicinity of 1001 39th Street, Brooklyn, New York, but did not cause his death.

Racketeering Act Nine:  
Conspiracy to Murder and Murder of  
Richard Cabrera, a/k/a "Bori"

41. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, committed the following acts, any one of which alone constitutes the commission of Racketeering Act Nine:

(A) Conspiracy to Murder Richard Cabrera, a/k/a "Bori"

42. From at least in or about 2005, up to and including on or about January 16, 2006, in the Southern District

of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, intentionally and knowingly conspired to murder Richard Cabrera, a/k/a "Bori," in violation of New York Penal Law, Sections 125.25 and 105.15, in that, with the intent to cause the death of Cabrera, RODRIGUEZ-PEREZ, FELIPE CANTRES-SANJURJO, and others known and unknown, agreed together and with each other to cause the death of Cabrera.

Overt Act

a. On or about January 16, 2006, at the direction of RODRIGUEZ-PEREZ and of CC-1, FELIPE CANTRES-SANJURJO shot and killed Cabrera in the vicinity of the Willis Avenue Bridge, in the Bronx, New York.

(B) Murder of Richard Cabrera, a/k/a "Bori"

43. On or about January 16, 2006, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, intentionally and knowingly did murder and aid and abet the murder of Richard Cabrera, a/k/a "Bori," in violation of New York Penal Law, Sections 125.25 and 20.00, in that, with the intent to

cause the death of Cabrera, and at the direction of RODRIGUEZ-PEREZ and of CC-1, FELIPE CANTRES-SANJURJO shot and caused the death of Cabrera in the vicinity of the Willis Avenue Bridge, in the Bronx, New York.

**Racketeering Act Ten:**  
**Conspiracy to Murder and Attempted Murder of**  
**Victim-5**

44. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, committed the following acts, any one of which alone constitutes the commission of Racketeering Act Ten:

**(A) Conspiracy to Murder Victim-5**

45. From in or about 2006, up through and including on or about December 30, 2006, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, intentionally and knowingly conspired to murder Victim-5, in violation of New York Penal Law, Sections 125.25 and 105.15, in that, with the intent to cause the death of Victim-5, RODRIGUEZ-PEREZ, FELIPE CANTRES-SANJURJO, and others known and unknown, agreed together and with each other to cause the death

of Victim-5.

Overt Act

a. On or about December 30, 2006, at the direction of RODRIGUEZ-PEREZ, and of CC-1, FELIPE CANTRES-SANJURJO shot at Victim-5 in the vicinity of 468 McDonald Avenue, Brooklyn, New York, but did not hit him.

(B) Attempted Murder of Victim-5

46. On or about December 30, 2006, in the Eastern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, intentionally and knowingly did attempt to murder and aid and abet the attempted murder of Victim-5 in violation of New York Penal Law Sections 125.25, 110.00, and 20.00, in that, with the intent to cause the death of Victim-5, and at the direction of RODRIGUEZ-PEREZ and of CC-1, FELIPE CANTRES-SANJURJO shot at Victim-5 in the vicinity of 468 McDonald Avenue, Brooklyn, New York, but did not cause his death.

Racketeering Act Eleven:

Conspiracy to Murder and Attempted Murder of Victim-6

47. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, committed

the following acts, any one of which alone constitutes the commission of Racketeering Act Eleven:

(A) Conspiracy to Murder Victim-6

48. From at least in or about 2007, up to and including on or about July 15, 2008, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, intentionally and knowingly conspired to murder Victim-6 in violation of New York Penal Law, Sections 125.25 and 105.15, in that, with the intent to cause the death of Victim-6, RODRIGUEZ-PEREZ and FELIPE CANTRES-SANJURJO, and others known and unknown, agreed together and with each other to cause the death of Victim-6.

Overt Act

a. On or about July 15, 2008, at the direction of RODRIGUEZ-PEREZ, a co-conspirator not named as a defendant herein ("CC-2") shot Victim-6 in the vicinity of 59 Nagle Avenue, New York, New York, but did not kill him.

(B) Attempted Murder of Victim-6

49. On or about July 15, 2008, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a

"Shorty," a/k/a "El Monstro," the defendant, and others known and unknown, intentionally and knowingly did attempt to murder and aid and abet the attempted murder of Victim-6 in violation of New York Penal Law Sections 125.25, 110.00, and 20.00, in that, at the direction of RODRIGUEZ-PEREZ, and with the intent to cause the death of Victim-6, CC-2 shot Victim-6 in the vicinity of 59 Nagle Avenue, New York, New York, but did not cause his death.

**Racketeering Act Twelve:**  
**Money Laundering Conspiracy, Bank Fraud, and**  
**Travel In Interstate Commerce In Aid Of Racketeering**

50. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," and JESUS SANCHEZ, the defendants, committed the following acts, any one of which alone constitutes the commission of Racketeering Act Twelve:

**(A) Money Laundering Conspiracy**

51. From at least in or about 2002 up to and including in or about 2010, in the Southern District of New York, Southern District of Florida, and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," and JESUS SANCHEZ, the defendants, and

others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other, in violation of Title 18, United States Code, Section 1956(h), to violate Title 18, United States Code, Section 1956(a)(1)(B)(i).

52. It was a part and an object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," and JESUS SANCHEZ, the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, narcotics trafficking, and knowing that such transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), all in violation of Title 18, United States Code, Section 1956(h).

(B) Bank Fraud

53. From in or about 2002 up to and including in or about 2010, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and JESUS SANCHEZ, the defendants, knowingly did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, RODRIGUEZ-PEREZ and JESUS SANCHEZ made false representations on loan applications and related documents for properties in order to influence banks in deciding whether to provide the loans and in deciding what terms to extend for the loans, in violation of Title 18, United States Code, Sections 1344 and 2.

(C) Travel in Interstate Commerce in Aid of Racketeering

54. From in or about 2005 through in or about 2010, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a

"Tio," a/k/a "Loco Loco," and JESUS SANCHEZ, the defendants, and others known and unknown, knowingly did travel in interstate and foreign commerce, and did use and cause to be used facilities in interstate and foreign commerce, with the intent to distribute the proceeds of an unlawful activity, namely, narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity, namely, money laundering and money laundering conspiracy, in violation of Title 18, United States Code, Section 1956, and thereafter did perform and attempt to perform an act, and aid and abet the performance of said act, to distribute the proceeds of said unlawful activities, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of said unlawful activities, to wit, RODRIGUEZ-PEREZ and RODRIGUEZ sent cash narcotics proceeds with couriers who traveled from New York to Florida to deliver the proceeds to SANCHEZ to facilitate money laundering, in violation of Title 18, United States Code, Sections 1952 and 2.

**Racketeering Act Thirteen:**  
**Money Laundering Conspiracy**

55. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and JOSE MANUEL ESPINAL, the defendants,

committed the following act, which constitutes the commission of Racketeering Act Thirteen:

56. From at least in or about 2009 up to and including at least in or about 2011, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and JOSE MANUEL ESPINAL, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other, in violation of Title 18, United States Code, Section 1956(h), to violate Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1957(a).

57. It was a part and an object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and JOSE MANUEL ESPINAL, the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, narcotics trafficking, knowing that the transactions were designed in whole and in part to conceal and

disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

58. It was a further part and an object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and JOSE MANUEL ESPINAL, the defendants, and others known and unknown, within the United States and involving United States persons, in an offense involving and affecting interstate and foreign commerce, knowingly would and did engage and attempt to engage in monetary transactions in criminally derived property of a value greater than \$10,000 that was derived from specified unlawful activity, to wit, narcotics trafficking, in violation of Title 18, United States Code, Section 1957(a), all in violation of Title 18, United States Code, Section 1956(h).

**Racketeering Act Fourteen:**  
**Money Laundering Conspiracy and Travel in Interstate and Foreign Commerce in Aid of Racketeering**

59. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a

"Lucas," the defendants, committed the following acts, any one of which alone constitutes the commission of Racketeering Act

Fourteen:

(A) Money Laundering Conspiracy

60. From in or about early 2007 through at least in or about October 2010, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other, in violation of Title 18, United States Code, Section 1956(h), to violate Title 18, United States Code, Sections 1956(a)(2)(B)(i) and 1956(a)(2)(B)(ii).

61. It was a part and object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, and others known and unknown, would and did transport, transmit, and transfer, and attempt to transport,

transmit, and transfer, a monetary instrument and funds from a place in the United States to or through a place outside the United States, to wit, from the United States to the Dominican Republic, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specific unlawful activity, to wit, narcotics trafficking, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

62. It was further a part and an object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, and others known and unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer, a monetary instrument and funds from a place in the United States to or through a place outside the United States, to wit, from the United States to the Dominican Republic, knowing that the monetary instrument and funds involved

in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to avoid a transaction reporting requirement under State or Federal law, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(ii), all in violation of Title 18, United States Code, Section 1956(h).

(B) Travel in Interstate and Foreign Commerce in Aid of Racketeering

63. In or about late 2007, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, and others known and unknown, knowingly did travel in interstate and foreign commerce, and did use and cause to be used facilities in interstate and foreign commerce, with the intent to distribute the proceeds of an unlawful activity, namely, narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity, namely, money laundering, in violation of Title 18, United States Code, Sections 1956 and 1957, and thereafter did perform and attempt to perform an act, and aid and abet the performance of said act, to

distribute the proceeds of said unlawful activities, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of said unlawful activities, to wit, RODRIGUEZ-PEREZ sent cash narcotics proceeds with a courier who traveled from New York to the Dominican Republic to deliver the proceeds to RODRIGUEZ to facilitate money laundering, in violation of Title 18, United States Code, Sections 1952 and 2.

**(C) Travel in Interstate and Foreign Commerce in Aid of Racketeering**

64. In or about early 2008, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, and others known and unknown, knowingly did travel in interstate and foreign commerce, and did use and cause to be used facilities in interstate and foreign commerce, with the intent to distribute the proceeds of an unlawful activity, namely, narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity, namely, money laundering, in violation of Title 18, United States Code, Sections 1956 and 1957, and thereafter did perform and attempt to

perform an act, and aid and abet the performance of said act, to distribute the proceeds of said unlawful activities, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of said unlawful activities, to wit, RODRIGUEZ-PEREZ sent cash narcotics proceeds with a courier who traveled from New York to the Dominican Republic to deliver the proceeds to RODRIGUEZ to facilitate money laundering, in violation of Title 18, United States Code, Sections 1952 and 2.

(D) Travel in Interstate and Foreign Commerce in Aid of Racketeering

65. In or about the fall of 2008, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, and others known and unknown, knowingly did travel in interstate and foreign commerce, and did use and cause to be used facilities in interstate and foreign commerce, with the intent to distribute the proceeds of an unlawful activity, namely, narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity, namely, money laundering, in violation of Title 18, United States Code,

Sections 1956 and 1957, and thereafter did perform and attempt to perform an act, and aid and abet the performance of said act, to distribute the proceeds of said unlawful activities, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of said unlawful activities, to wit, RODRIGUEZ-PEREZ sent cash narcotics proceeds with a courier who traveled from New York to the Dominican Republic to deliver the proceeds to RODRIGUEZ to facilitate money laundering, in violation of Title 18, United States Code, Sections 1952 and 2.

**Racketeering Act Fifteen:**  
**Obstruction of Justice and Conspiracy to Obstruct Justice**

66. JOSE MANUEL ESPINAL, the defendant, committed the following acts, any one of which alone constitutes the commission of Racketeering Act Fifteen:

**(A) Obstruction of Justice**

67. In or about 2010, in the Southern District of New York and elsewhere, JOSE MANUEL ESPINAL, the defendant, did corruptly alter, destroy, mutilate, and conceal a record, document, and other object, and attempt to do so, with the intent to impair the object's integrity and availability for use in an official proceeding, and did corruptly obstruct, influence, and impede an official proceeding, and attempt to do so, to wit, ESPINAL caused an individual not named as a defendant herein to submit in response to a grand jury subpoena false documents

concerning expenses paid and owed by ESPINAL and by MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, in violation of Title 18, United States Code, Sections 1512(c)(1), 1512(c)(2), and 2.

(B) Conspiracy to Obstruct Justice

68. In or about 2010, in the Southern District of New York and elsewhere, JOSE MANUEL ESPINAL, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other, in violation of Title 18, United States Code, Section 1512(k), to violate Title 18, United States Code, Sections 1512(c)(1) and 1512(c)(2).

69. It was a part and object of the conspiracy that JOSE MANUEL ESPINAL, the defendant, and others known and unknown, would and did corruptly alter, destroy, mutilate, and conceal a record, document, and other object, to wit, documents reflecting expenses paid and owed by ESPINAL and by MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, with the intent to impair the object's integrity and availability for use in an official proceeding.

70. It was a further part and object of the conspiracy that JOSE MANUEL ESPINAL, the defendant, and others known and

unknown, would and did corruptly obstruct, influence, and impede an official proceeding, to wit, a grand jury proceeding, in violation of Title 18, United States Code, Section 1512(k).

**Racketeering Act Sixteen:**  
**Obstruction of Justice**

71. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, committed the following act, which constitutes the commission of Racketeering Act Sixteen:

72. In or about January 2011, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, did use physical force and the threat of physical force against a person, and did attempt to use force and the threat of physical force against a person, and did knowingly use intimidation, threats, and corrupt persuasion of another person, and did attempt to use intimidation, threats, and corrupt persuasion, with the intent to: influence, delay, and prevent the testimony of any person in an official proceeding; cause and induce any person to withhold testimony, and withhold a record, document, and other object from an official proceeding, and be absent from an official proceeding to which that person has been summoned by legal process; and hinder, delay, and prevent the communication to a law enforcement officer and a judge of the United States of information relating

to the commission and possible commission of a Federal offense, to wit, RODRIGUEZ-PEREZ threatened a co-conspirator not charged in this Indictment ("CC-3") with violence if CC-3 cooperated with the investigation of RODRIGUEZ-PEREZ and of ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendant, in violation of Title 18, United States Code, Sections 1512(a)(2), 1512(a)(3)(C), 1512(b), and 2.

**Racketeering Act Seventeen:**  
**Obstruction of Justice and Conspiracy to Obstruct Justice**

73. JOSE MANUEL ESPINAL, the defendant, committed the following acts, any one of which alone constitutes the commission of Racketeering Act Seventeen:

**(A) Obstruction of Justice**

74. In or about November 2011, in the Southern District of New York and elsewhere, JOSE MANUEL ESPINAL, the defendant, did corruptly obstruct, influence, and impede an official proceeding, and attempt to do so, to wit, ESPINAL caused an individual not named as a defendant herein to submit in response to a grand jury subpoena a false document concerning payments made in connection with property purchased by an entity jointly owned by ESPINAL and by MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, in violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

(B) Conspiracy to Obstruct Justice

75. In or about November 2011, in the Southern District of New York and elsewhere, JOSE MANUEL ESPINAL, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other, in violation of Title 18, United States Code, Section 1512(k), to violate Title 18, United States Code, Section 1512(c)(2).

76. It was a part and object of the conspiracy that JOSE MANUEL ESPINAL, the defendant, and others known and unknown, would and did corruptly obstruct, influence, and impede an official proceeding, to wit, by causing the submission in response to a grand jury subpoena of a false document concerning payments made in connection with property purchased by an entity jointly owned by ESPINAL and by MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, in violation of Title 18, United States Code, Section 1512(k).

(Title 18, United States Code, Sections 1961 and 1962(c).)

COUNT TWO  
(Racketeering Conspiracy)

The Grand Jury further charges:

77. Paragraphs 1 through 13 and 15 through 76 of Count One of this Indictment are realleged and incorporated by reference as though fully set forth herein.

78. From at least in or about 1996, up to and including in or about 2012, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," JOSE MANUEL ESPINAL, THEODORE JONES, a/k/a "Derrick Miles," a/k/a "Theo," a/k/a "Tito," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," OSCAR RODRIGUEZ, a/k/a "Elias Rodriguez," a/k/a "Chang," a/k/a "Chan," and JESUS SANCHEZ, the defendants, and others known and unknown, being persons employed by and associated with the Enterprise described in Paragraphs 1 through 13 of Count One of this Indictment, to wit, the Rodriguez Organization, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Section 1962(c) of Title 18, United States Code, that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that Enterprise, which was engaged in, and the activities of which affected, interstate and foreign commerce, through a pattern of racketeering activity, to wit, acts involving narcotics trafficking, which is chargeable under New

York Penal Law Sections 20.00, 105.15, 110.00, 220.06, 220.31, and 220.39, and in violation of Title 21, United States Code, Sections 812, 841, 843, and 846; murder, which is chargeable under New York Penal Law Sections 20.00, 105.15, 110.00, and 125.25, and New Jersey Statutes 2C:11-3, 2C:2-6(b)(4), and 2C:2-6(c); money laundering and money laundering conspiracy, in violation of Title 18, United States Code, Sections 1956 and 1957; bank fraud, in violation of Title 18, United States Code, Section 1344; travel in interstate and foreign commerce in aid of racketeering, in violation of Title 18, United States Code, Section 1952; and obstruction of justice, in violation of Title 18, United States Code, Section 1512. It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the Enterprise.

(Title 18, United States Code, Section 1962(d).)

**COUNT THREE**  
**(Narcotics Conspiracy)**

The Grand Jury further charges:

79. From at least in or about 1992, up to and including in or about 2011, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a

"Manuel Cantres," a/k/a "Bimbo," THEODORE JONES, a/k/a "Derrick Miles," a/k/a "Theo," a/k/a "Tito," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," OSCAR RODRIGUEZ, a/k/a "Elias Rodriguez," a/k/a "Chang," a/k/a "Chan," and JESUS SANCHEZ, 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.

80. It was a part and an object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," THEODORE JONES, a/k/a "Derrick Miles," a/k/a "Theo," a/k/a "Tito," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," OSCAR RODRIGUEZ, a/k/a "Elias Rodriguez," a/k/a "Chang," a/k/a "Chan," and JESUS SANCHEZ, the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

81. The controlled substance involved in the offense was 1,000 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A).

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

COUNT FOUR

(Murder of Francisco Perez, a/k/a "Francisco Rodriguez," a/k/a "Frank Diaz," a/k/a "Francie," in Aid of Racketeering Activity)

The Grand Jury further charges:

82. The Rodriguez Organization, as described in Paragraphs 1 through 13 of Count One of this Indictment, which are realleged and incorporated by reference as though fully set forth herein, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals engaged in, and the activities of which affected, interstate and foreign commerce.

83. The Rodriguez Organization, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(a) and 1959(b)(1), that is, acts involving narcotics trafficking, which is chargeable under New York Penal Law Sections 20.00, 105.15, 110.00, 220.06, 220.31, and 220.39, and in violation of Title 21, United States Code, Sections 812, 841, 843, and 846; murder, which is chargeable under New York Penal Law Sections 20.00,

105.15, 110.00, and 125.25, and New Jersey Statutes 2C:11-3, 2C:2-6(b)(4), and 2C:2-6(c); money laundering and money laundering conspiracy, in violation of Title 18, United States Code, Sections 1956 and 1957; bank fraud, in violation of Title 18, United States Code, Section 1344; travel in interstate and foreign commerce in aid of racketeering, in violation of Title 18, United States Code, Section 1952; and obstruction of justice, in violation of Title 18, United States Code, Section 1512.

84. On or about October 26, 1997, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Rodriguez Organization, and for the purpose of gaining entrance to and maintaining and increasing position in the Rodriguez Organization, an enterprise engaged in racketeering activity, as described above, knowingly did murder and aid and abet the murder of Francisco Perez, a/k/a "Francisco Rodriguez," a/k/a "Frank Diaz," a/k/a "Francie," in violation of New York Penal Law Sections 125.25 and 20.00.

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

COUNT FIVE

(Murder of Francisco Perez, a/k/a "Francisco Rodriguez," a/k/a "Frank Diaz," a/k/a "Francie," While Engaged in a Narcotics Trafficking Offense)

The Grand Jury further charges:

85. On or about October 26, 1997, in the Southern District of New York, while engaged in an offense punishable under Section 841(b)(1)(A) of Title 21, United States Code, to wit, the narcotics conspiracy charged in Count Three of this Indictment, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, and others known and unknown, intentionally and knowingly killed, and counseled, commanded, induced, procured, and caused the intentional killing of Francisco Perez, a/k/a "Francisco Rodriguez," a/k/a "Frank Diaz," a/k/a "Francie," in the vicinity of 3845 10th Avenue, New York, New York.

(Title 21, United States Code, Section 848(e)(1)(A);  
and Title 18, United States Code, Section 2.)

COUNT SIX

(Murder of Francisco Perez, a/k/a "Francisco Rodriguez," a/k/a "Frank Diaz," a/k/a "Francie," During and in Relation to a Drug Trafficking Crime)

The Grand Jury further charges:

86. On or about October 26, 1997, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, during and in

relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count Three of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, and in the course thereof did cause the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, RODRIGUEZ-PEREZ solicited a co-conspirator to shoot and kill Francisco Perez, a/k/a "Francisco Rodriguez," a/k/a "Frank Diaz," a/k/a "Francie," in the vicinity of 3845 10th Avenue, New York, New York.

(Title 18, United States Code, Sections 924(j) and 2.)

COUNT SEVEN

(Murder of Antonio Kasse, a/k/a "Antonio Kasse Checo," a/k/a "Antonio Casse," a/k/a "Rafael Alvarez," a/k/a "Toasty," a/k/a "Tony," in Aid of Racketeering Activity)

The Grand Jury further charges:

87. Paragraphs 1 through 13 and 81 through 83 are realleged and incorporated by reference as though fully set forth herein.

88. On or about December 13, 1998, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, and others known and unknown, as consideration for the receipt of, and as

consideration for a promise and agreement to pay, a thing of pecuniary value from the Rodriguez Organization, and for the purpose of gaining entrance to and maintaining and increasing position in the Rodriguez Organization, an enterprise engaged in racketeering activity, as described above, knowingly did murder and aid and abet the murder of Antonio Kasse, a/k/a "Antonio Kasse Checo," a/k/a "Antonio Casse," a/k/a "Rafael Alveraz," a/k/a "Toasty," a/k/a "Tony," in violation of New York Penal Law Sections 125.25 and 20.00.

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

COUNT EIGHT

(Murder of Antonio Kasse, a/k/a "Antonio Kasse Checo," a/k/a "Antonio Casse," a/k/a "Rafael Alvarez," a/k/a "Toasty," a/k/a "Tony," While Engaged in a Narcotics Trafficking Offense)

The Grand Jury further charges:

89. On or about December 13, 1998, in the Southern District of New York, while engaged in an offense punishable under Section 841(b)(1)(A) of Title 21, United States Code, to wit, the narcotics conspiracy charged in Count Three of this Indictment, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, and others known and unknown, intentionally and knowingly killed, and counseled, commanded, induced, procured, and caused the intentional killing of Antonio Kasse, a/k/a "Antonio Kasse Checo," a/k/a "Antonio Casse," a/k/a "Rafael Alveraz," a/k/a "Toasty," a/k/a "Tony," in the vicinity

of 165 Nagle Avenue, New York, New York.

(Title 21, United States Code, Section 848(e)(1)(A);  
and Title 18, United States Code, Section 2.)

COUNT NINE

(Murder of Antonio Kasse, a/k/a "Antonio Kasse Checo," a/k/a  
"Antonio Casse," a/k/a "Rafael Alvarez," a/k/a "Toasty," a/k/a  
"Tony," During and in Relation to a Drug Trafficking Crime)

The Grand Jury further charges:

90. On or about December 13, 1998, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count Three of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, and in the course thereof did cause the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, RODRIGUEZ-PEREZ solicited a co-conspirator to shoot and kill Antonio Kasse, a/k/a "Antonio Kasse Checo," a/k/a "Antonio Casse," a/k/a "Rafael Alveraz," a/k/a "Toasty," a/k/a "Tony," in the vicinity of 165 Nagle Avenue, New York, New York.

(Title 18, United States Code, Sections 924(j) and 2.)

COUNT TEN

(Murder of FNU LNU, a/k/a "Carlos Valentin," a/k/a "Campesino,"  
a/k/a "Campi," in Aid of Racketeering Activity)

The Grand Jury further charges:

91. Paragraphs 1 through 13 and 82 through 83 are realleged and incorporated by reference as though fully set forth herein.

92. In or about 2000, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Rodriguez Organization, and for the purpose of gaining entrance to and maintaining and increasing position in the Rodriguez Organization, an enterprise engaged in racketeering activity, as described above, knowingly did murder and aid and abet the murder of FNU LNU, a/k/a "Carlos Valentin," a/k/a "Campesino," a/k/a "Campi," in violation of New York Penal Law Sections 125.25 and 20.00.

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

COUNT ELEVEN

(Murder of FNU LNU, a/k/a "Carlos Valentin," a/k/a "Campesino," a/k/a "Campi," While Engaged in a Narcotics Trafficking Offense)

The Grand Jury further charges:

93. In or about 2000, in the Southern District of New York, while engaged in an offense punishable under Section 841(b)(1)(A) of Title 21, United States Code, to wit, the narcotics conspiracy charged in Count Three of this Indictment, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendant, and others known and unknown, intentionally and knowingly killed, and counseled, commanded, induced, procured, and caused the intentional killing of FNU LNU, a/k/a "Carlos Valentin," a/k/a "Campesino," a/k/a "Campi," in the vicinity of Riverdale Park, Bronx, New York.

(Title 21, United States Code, Section 848(e)(1)(A);  
and Title 18, United States Code, Section 2.)

COUNT TWELVE

(Murder of Jose Caba, a/k/a "Curly," During and in Relation to a Drug Trafficking Crime)

The Grand Jury further charges:

94. On or about July 14, 2003, in the Southern District of New York, MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the

narcotics conspiracy charged in Count Three of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, and in the course thereof did cause the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, MIGUEL CANTRES-SANJURJO shot and killed Jose Caba, a/k/a "Curly," in the vicinity of 17-23 Post Avenue, New York, New York.

(Title 18, United States Code, Sections 924(j) and 2.)

COUNT THIRTEEN

(Murder of Wilfredo Molina, a/k/a "Willie," in Aid of Racketeering Activity)

The Grand Jury further charges:

95. Paragraphs 1 through 13 and 82 through 83 are realleged and incorporated by reference as though fully set forth herein.

96. On or about May 3, 2004, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," and MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of

pecuniary value from the Rodriguez Organization, and for the purpose of gaining entrance to and maintaining and increasing position in the Rodriguez Organization, an enterprise engaged in racketeering activity, as described above, knowingly did murder and aid and abet the murder of Wilfredo Molina, a/k/a "Willie," in violation of New Jersey Statutes 2C:11-3 and 2C:2-6(c).

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

**COUNT FOURTEEN**

**(Conspiracy to Commit Murder for Hire of Wilfredo Molina,  
a/k/a "Willie")**

The Grand Jury further charges:

97. From at least in or about 2003, up to and including on or about May 3, 2004, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," and MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," the defendants, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to travel in and cause another to travel in interstate and foreign commerce, and to use and cause another to use a facility of interstate and foreign commerce, with intent that a murder be committed in violation of any state and the United States, as consideration for the receipt of, and as consideration for a promise and agreement to pay,

something of pecuniary value, as those terms are defined in Title 18, United States Code, Section 1958(b), to wit, RODRIGUEZ-PEREZ, FELIPE CANTRES-SANJURJO, and MIGUEL CANTRES-SANJURJO conspired to travel in interstate and foreign commerce in connection with the murder of Wilfredo Molina, a/k/a "Willie," in the vicinity of Englewood, New Jersey, for which murder RODRIGUEZ-PEREZ agreed to pay FELIPE CANTRES-SANJURJO and MIGUEL CANTRES-SANJURJO.

(Title 18, United States Code, Section 1958.)

COUNT FIFTEEN

(Murder for Hire of Wilfredo Molina, a/k/a "Willie")

The Grand Jury further charges:

98. From at least in or about 2003, up to and including on or about May 3, 2004, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," and MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," the defendants, willfully and knowingly traveled in, and caused another to travel in, interstate and foreign commerce, and used and caused another to use a facility of interstate and foreign commerce, with the intent that a murder be committed in violation of the laws of any State and the United States, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value, as those terms are defined in Title

18, United States Code, Section 1958(b), and did aid and abet the same, to wit, FELIPE CANTRES-SANJURJO and MIGUEL CANTRES-SANJURJO traveled in interstate commerce in connection with the murder of Wilfredo Molina, a/k/a "Willie," in the vicinity of Englewood, New Jersey, for which murder RODRIGUEZ-PEREZ agreed to pay FELIPE CANTRES-SANJURJO and MIGUEL CANTRES-SANJURJO.

(Title 18, United States Code, Sections 1958 and 2.)

COUNT SIXTEEN

(Murder of Wilfredo Molina, a/k/a "Willie," While Engaged in a Narcotics Trafficking Offense)

The Grand Jury further charges:

99. On or about May 3, 2004, in the Southern District of New York and elsewhere, while engaged in an offense punishable under Section 841(b)(1)(A) of Title 21, United States Code, to wit, the narcotics conspiracy charged in Count Three of this Indictment, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," and MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," the defendants, and others known and unknown, intentionally and knowingly killed, and counseled, commanded, induced, procured, and caused the intentional killing of Wilfredo Molina, a/k/a "Willie," in the vicinity of Englewood, New Jersey.

(Title 21, United States Code, Section 848(e)(1)(A);  
and Title 18, United States Code, Section 2.)

COUNT SEVENTEEN

(Murder of Wilfredo Molina, a/k/a "Willie," During and in Relation to a Drug Trafficking Crime)

The Grand Jury further charges:

100. On or about May 3, 2004, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," and MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," 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 Three of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, and in the course thereof did cause the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, at the direction of RODRIGUEZ-PEREZ and of CC-1, and with the assistance of MIGUEL CANTRES-SANJURJO, FELIPE CANTRES-SANJURJO shot and killed Wilfredo Molina, a/k/a "Willie," in the vicinity of Englewood, New Jersey.

(Title 18, United States Code, Sections 924(j) and 2.)

COUNT EIGHTEEN  
(Murder of Richard Cabrera, a/k/a "Bori,"  
in Aid of Racketeering Activity)

The Grand Jury further charges:

101. Paragraphs 1 through 13 and 82 through 83 are realleged and incorporated by reference as though fully set forth herein.

102. On or about January 16, 2006, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Rodriguez Organization, and for the purpose of gaining entrance to and maintaining and increasing position in the Rodriguez Organization, an enterprise engaged in racketeering activity, as described above, knowingly did murder and aid and abet the murder of Richard Cabrera, a/k/a "Bori," in violation of New York Penal Law Sections 125.25 and 20.00.

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

COUNT NINETEEN  
(Conspiracy to Commit Murder for Hire of  
Richard Cabrera, a/k/a "Bori")

The Grand Jury further charges:

103. From at least in or about 2005, up to and including on or about January 16, 2006, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to travel in and cause another to travel in interstate and foreign commerce, and did use and cause another to use a facility of interstate and foreign commerce, with intent that a murder be committed in violation of any state and the United States, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value, as those terms are defined in Title 18, United States Code, Section 1958(b), to wit, RODRIGUEZ-PEREZ and FELIPE CANTRES-SANJURJO agreed that CANTRES-SANJURJO would travel in interstate and foreign commerce in connection with the murder of Richard Cabrera, a/k/a "Bori," in the vicinity of the Willis Avenue Bridge, Bronx, New York, for which murder RODRIGUEZ-PEREZ agreed to pay CANTRES-SANJURJO.

(Title 18, United States Code, Section 1958.)

COUNT TWENTY

(Murder for Hire of Richard Cabrera, a/k/a "Bori")

The Grand Jury further charges:

104. From at least in or about 2005, up to and including on or about January 16, 2006, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, willfully and knowingly traveled in, and caused another to travel in, interstate and foreign commerce, and used and caused another to use any facility of interstate and foreign commerce, with the intent that a murder be committed in violation of the laws of any State and the United States, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value, as those terms are defined in Title 18, United States Code, Section 1958(b), and did aid and abet the same, to wit, FELIPE CANTRES-SANJURJO traveled in interstate and foreign commerce in connection with the murder of Richard Cabrera, a/k/a "Bori," in the vicinity of the Willis Avenue Bridge, Bronx, New York, for which murder RODRIGUEZ-PEREZ agreed to pay CANTRES-SANJURJO.

(Title 18, United States Code, Sections 1958 and 2.)

COUNT TWENTY-ONE

(Murder of Richard Cabrera, a/k/a "Bori," While Engaged in a  
Narcotics Trafficking Offense)

The Grand Jury further charges:

105. On or about January 16, 2006, in the Southern District of New York, while engaged in an offense punishable under Section 841(b)(1)(A) of Title 21, United States Code, to wit, the narcotics conspiracy charged in Count Three of this Indictment, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, intentionally and knowingly killed, and counseled, commanded, induced, procured, and caused the intentional killing of Richard Cabrera, a/k/a "Bori," in the vicinity of the Willis Avenue Bridge, Bronx, New York.

(Title 21, United States Code, Section 848(e)(1)(A);  
and Title 18, United States Code, Section 2.)

COUNT TWENTY-TWO

(Murder of Richard Cabrera, a/k/a "Bori," During and in Relation  
to a Drug Trafficking Crime)

The Grand Jury further charges:

106. On or about January 16, 2006, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," 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 Three of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, and in the course thereof did cause the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, RODRIGUEZ-PEREZ solicited FELIPE CANTRES-SANJURJO to shoot and kill Richard Cabrera, a/k/a "Bori," in the vicinity of the Willis Avenue Bridge, Bronx, New York.

(Title 18, United States Code, Sections 924(j) and 2.)

**COUNT TWENTY-THREE**

**(Conspiracy to Murder Victim-6 in Aid of Racketeering Activity)**

The Grand Jury further charges:

107. Paragraphs 1 through 13 and 82 through 83 are realleged and incorporated by reference as though fully set forth herein.

108. From in or about 2007, up to and including on or about July 15, 2008, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a

thing of pecuniary value from the Rodriguez Organization, and for the purpose of gaining entrance to and maintaining and increasing position in the Rodriguez Organization, knowingly conspired to murder Victim-6 in violation of New York Penal Law, Sections 20.00, 105.15, and 125.25.

(Title 18, United States Code, Sections 1959(a)(5) and 2.)

COUNT TWENTY-FOUR

(Attempt to Murder Victim-6 in Aid of Racketeering Activity)

The Grand Jury further charges:

109. Paragraphs 1 through 13 and 82 through 83 are realleged and incorporated by reference as though fully set forth herein.

110. On or about July 15, 2008, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "el Monstro," the defendant, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Rodriguez Organization, and for the purpose of gaining entrance to and maintaining and increasing position in the Rodriguez Organization, intentionally and knowingly attempted to murder an individual, to wit, at the direction of RODRIGUEZ-PEREZ, CC-2 shot, but did not kill,

Victim-6 in the vicinity of 59 Nagle Avenue, New York, New York, in violation of New York Penal Law, Sections 20.00, 110.00, and 125.25.

(Title 18, United States Code, Section 1959(a)(5) and 2.)

COUNT TWENTY-FIVE

(Assault of Victim-6 in Aid of Racketeering Activity)

The Grand Jury further charges:

111. Paragraphs 1 through 13 and 82 through 83 are realleged and incorporated by reference as though fully set forth herein.

112. On or about July 15, 2008, in the Southern District of New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "el Monstro," the defendant, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Rodriguez Organization, and for the purpose of gaining entrance to and maintaining and increasing position in the Rodriguez Organization, intentionally and knowingly assaulted an individual with a dangerous weapon, and aided and abetted the same, to wit, at the direction of RODRIGUEZ-PEREZ, CC-2 shot, but did not kill, Victim-6 in the

vicinity of 59 Nagle Avenue, New York, New York, in violation of New York Penal Law, Sections 20.00, 120.05, and 120.10.

(Title 18, United States Code, Sections 1959(a)(3) and 2.)

**COUNT TWENTY-SIX**  
**(Money Laundering Conspiracy)**

The Grand Jury further charges:

113. From in or about 2002 through in or about 2010, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," and JESUS SANCHEZ, the defendants, and others known and unknown, knowingly and willfully did combine, conspire, confederate and agree together and with each other to violate Title 18, United States Code, Section 1956 (a)(1)(B)(i).

114. It was a part and an object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," and JESUS SANCHEZ, the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, knowingly would and did conduct and attempt to conduct

such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, narcotics trafficking, knowing that such transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Section 1956(h).)

**COUNT TWENTY-SEVEN**  
**(Bank Fraud Conspiracy)**

The Grand Jury further charges:

115. From in or about 2002 up to and including in or about 2010, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and JESUS SANCHEZ, the defendants, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1344.

116. It was a part and an object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and JESUS SANCHEZ, the defendants, and others known and unknown, willfully and knowingly would and did execute and attempt to execute a scheme and artifice to defraud financial

institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, to wit, RODRIGUEZ-PEREZ and SANCHEZ made false representations on loan applications and related documents for properties in order to influence banks in deciding whether to provide the loans and in deciding what terms to extend for the loans.

#### Overt Acts

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

a. In or about April 2008, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," made false statements on applications for mortgages from Bank of America on a property located at 1830 South Ocean Drive, Unit 2302, Hallandale, Florida, to wit, RODRIGUEZ-PEREZ falsely claimed he would use the property for his personal use, and that he had a legitimate source of income; and

b. In or about 2007, JESUS SANCHEZ and a co-conspirator not named as a defendant herein ("CC-4") made false

statements on applications for mortgages from Countrywide Financial on a property located at 220 NW 129th Avenue, Miami, Florida, to wit, SANCHEZ falsely claimed that he had a legitimate source of income.

(Title 18, United States Code, Section 1349.)

**COUNT TWENTY-EIGHT**  
**(Money Laundering Conspiracy)**

The Grand Jury further charges:

118. From at least in or about 2009, up to and including at least in or about 2011, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and JOSE MANUEL ESPINAL, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1957(a).

119. It was a part and an object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and JOSE MANUEL ESPINAL, the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, willfully and

knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, narcotics trafficking, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

120. It was further a part and an object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and JOSE MANUEL ESPINAL, the defendants, and others known and unknown, within the United States and involving United States persons, in an offense involving and affecting interstate and foreign commerce, willfully and knowingly would and did engage and attempt to engage in monetary transactions in criminally derived property of a value greater than \$10,000 that was derived from specified unlawful activity, to wit, narcotics trafficking, in violation of Title 18, United States Code, Section 1957(a).

(Title 18, United States Code, Section 1956(h).)

COUNT TWENTY-NINE  
(Money Laundering Conspiracy)

The Grand Jury further charges:

121. From in or about early 2007 through at least in or about October 2010, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Sections 1956(a)(2)(B)(i) and 1956(a)(2)(B)(ii).

122. It was a part and an object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, and others known and unknown, transported, transmitted, and transferred, and attempted to transport, transmit, and transfer, a monetary instrument and funds from a place in the United States to or through a place outside the

United States, to wit, from the United States to the Dominican Republic, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specific unlawful activity, to wit, narcotics trafficking, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

123. It was further a part and an object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, and others known and unknown, transported, transmitted, and transferred, and attempted to transport, transmit, and transfer, a monetary instrument and funds from a place in the United States to or through a place outside the United States, to wit, from the United States to the Dominican Republic, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and

knowing that such transportation, transmission, and transfer was designed in whole and in part to avoid a transaction reporting requirement under State or Federal law, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(ii).

(Title 18, United States Code, Section 1956(h).)

**COUNT THIRTY**

**(Travel in Interstate and Foreign Commerce in Aid of Racketeering)**

The Grand Jury further charges:

124. In or about late 2007, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, and others known and unknown, knowingly did travel in interstate and foreign commerce, and did use and cause to be used facilities in interstate and foreign commerce, with the intent to distribute the proceeds of an unlawful activity, namely, narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity, namely, money laundering, in violation of Title 18, United States Code, Sections 1956 and 1957, and narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846, and

thereafter did perform and attempt to perform an act, and aid and abet the performance of said act, to distribute the proceeds of said unlawful activities, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of said unlawful activities, to wit, RODRIGUEZ-PEREZ sent cash narcotics proceeds with a courier who traveled from New York to the Dominican Republic to deliver the proceeds to RODRIGUEZ to facilitate narcotics trafficking and money laundering.

(Title 18, United States Code, Sections 1952 and 2.)

COUNT THIRTY-ONE  
(Travel in Interstate and Foreign Commerce in Aid of Racketeering)

The Grand Jury further charges:

125. In or about early 2008, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, and others known and unknown, knowingly did travel in interstate and foreign commerce, and did use and cause to be used facilities in interstate and foreign commerce, with the intent to distribute the proceeds of an unlawful activity, namely, narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846, and to promote, manage, establish,

carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity, namely, money laundering, in violation of Title 18, United States Code, Sections 1956 and 1957, and narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846, and thereafter did perform and attempt to perform an act, and aid and abet the performance of said act, to distribute the proceeds of said unlawful activities, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of said unlawful activities, to wit, RODRIGUEZ-PEREZ sent cash narcotics proceeds with a courier who traveled from New York to the Dominican Republic to deliver the proceeds to RODRIGUEZ to facilitate narcotics trafficking and money laundering.

(Title 18, United States Code, Sections 1952 and 2.)

COUNT THIRTY-TWO

(Travel in Interstate and Foreign Commerce in Aid of Racketeering)

The Grand Jury further charges:

126. In or about the fall of 2008, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendants, and others known and unknown, knowingly did travel in interstate and foreign commerce, and did use and cause

to be used facilities in interstate and foreign commerce, with the intent to distribute the proceeds of an unlawful activity, namely, narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity, namely, money laundering, in violation of Title 18, United States Code, Sections 1956 and 1957, and narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846, and thereafter did perform and attempt to perform an act, and aid and abet the performance of said act, to distribute the proceeds of said unlawful activities, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of said unlawful activities, to wit, RODRIGUEZ-PEREZ set cash narcotics proceeds with a courier who traveled from New York to the Dominican Republic to deliver the proceeds to RODRIGUEZ to facilitate narcotics trafficking and money laundering.

(Title 18, United States Code, Sections 1952 and 2.)

COUNT THIRTY-THREE

(Travel in Interstate Commerce in Aid of Racketeering)

The Grand Jury further charges:

127. From at least in or about 2005, up to and including in or about 2010, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel

Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," and JESUS SANCHEZ, the defendants, and others known and unknown, knowingly did travel in interstate and foreign commerce, and did use and cause to be used facilities in interstate commerce, with the intent to distribute the proceeds of an unlawful activity, namely, narcotics trafficking, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely, money laundering, in violation of Title 18, United States Code, Sections 1956 and 1957, and narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846, and thereafter did perform and attempt to perform an act, and aid and abet the performance of said act, to distribute the proceeds of an unlawful activity, namely, narcotics trafficking, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activities, namely, narcotics trafficking and money laundering, to wit, RODRIGUEZ-PEREZ and RODRIGUEZ sent cash narcotics proceeds with couriers who traveled from New York to Florida, via the Southern District of New York, to deliver the proceeds to SANCHEZ to facilitate narcotics trafficking and money laundering.

(Title 18, United States Code, Sections 1952 and 2.)

COUNT THIRTY-FOUR  
(Obstruction of Justice)

The Grand Jury further charges:

128. In or about 2010, in the Southern District of New York and elsewhere, JOSE MANUEL ESPINAL, the defendant, did corruptly alter, destroy, mutilate, and conceal a record, document, and other object, and attempt to do so, with the intent to impair the object's integrity and availability for use in an official proceeding, and did corruptly obstruct, influence, and impede an official proceeding, and attempt to do so, to wit, ESPINAL caused an individual not named as a defendant herein to submit in response to a grand jury subpoena false documents concerning expenses paid and owed by ESPINAL and by MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant.

(Title 18, United States Code, Sections 1512(c)(1),  
1512(c)(2), and 2.)

COUNT THIRTY-FIVE  
(Conspiracy to Obstruct Justice)

The Grand Jury further charges:

129. In or about 2010, in the Southern District of New York and elsewhere, JOSE MANUEL ESPINAL, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Sections

1512(c)(1) and 1512(c)(2).

130. It was a part and object of the conspiracy that JOSE MANUEL ESPINAL, the defendant, and others known and unknown, would and did corruptly alter, destroy, mutilate, and conceal a record, document, and other object, to wit, documents reflecting expenses paid and owed by ESPINAL and by MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, with the intent to impair the object's integrity and availability for use in an official proceeding.

131. It was a further part and object of the conspiracy that JOSE MANUEL ESPINAL, the defendant, and others known and unknown, would and did corruptly obstruct, influence, and impede an official proceeding, to wit, a grand jury proceeding.

(Title 18, United States Code, Section 1512(k).)

**COUNT THIRTY-SIX**  
**(Obstruction of Justice)**

132. In or about January 2011, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, did use physical force and the threat of physical force against a person, and did attempt to use force and the threat of physical force against a person, and did knowingly use intimidation, threats, and corrupt persuasion of another person, and did attempt to use

intimidation, threats, and corrupt persuasion, with the intent to: influence, delay, and prevent the testimony of a person in an official proceeding; cause and induce a person to withhold testimony, and withhold a record, document, and other object from an official proceeding, and be absent from an official proceeding to which that person has been summoned by legal process; and hinder, delay, and prevent the communication to a law enforcement officer and a judge of the United States of information relating to the commission and possible commission of a Federal offense, to wit, RODRIGUEZ-PEREZ threatened CC-3 with violence if CC-3 cooperated with the investigation of RODRIGUEZ-PEREZ and of ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," the defendant.

(Title 18, United States Code, Sections 1512(a)(2),  
1512(a)(3)(C), 1512(b), and 2.)

**COUNT THIRTY-SEVEN**  
**(Obstruction of Justice)**

The Grand Jury further charges:

133. In or about November 2011, in the Southern District of New York and elsewhere, JOSE MANUEL ESPINAL, the defendant, did corruptly obstruct, influence, and impede an official proceeding, and attempt to do so, to wit, ESPINAL caused an individual not named as a defendant herein to submit in response to a grand jury subpoena a false document concerning payments made in connection with property purchased by an entity

jointly owned by ESPINAL and by MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant.

(Title 18, United States Code, Sections 1512(c)(2) and 2.)

**COUNT THIRTY-EIGHT**  
**(Conspiracy to Obstruct Justice)**

The Grand Jury further charges:

134. In or about November 2011, in the Southern District of New York and elsewhere, JOSE MANUEL ESPINAL, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1512(c)(2).

135. It was a part and an object of the conspiracy that JOSE MANUEL ESPINAL, the defendant, and others known and unknown, would and did corruptly obstruct, influence, and impede an official proceeding, to wit, by causing the submission in response to a grand jury subpoena of a false document concerning payments made in connection with property purchased by an entity jointly owned by ESPINAL and by MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant.

(Title 18, United States Code, Section 1512(k).)

COUNT THIRTY-NINE  
(False Statement)

The Grand Jury further charges:

136. From in or about December 2009, up to and including in or about 2010, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully did falsify, conceal, and cover up by trick, scheme, and device a material fact and did make materially false, fictitious, and fraudulent statements and representations, and did use a false writing and document knowing the same to contain materially false, fictitious, and fraudulent statements and entries, to wit, RODRIGUEZ-PEREZ submitted, and caused co-conspirators not charged in this Indictment ("CC-5" and "CC-6") to submit, false sworn documents to U.S. Customs and Border Protection officials falsely claiming that funds seized from RODRIGUEZ-PEREZ on or about December 3, 2009, belonged to a restaurant owned by CC-5 and CC-6.

(Title 18, United States Code, Sections 1001 and 2.)

COUNT FORTY

(Use, Carrying, and Possession of Firearms in During and in  
Relation to and in Furtherance of Racketeering)

The Grand Jury further charges:

137. From at least in or about 1996, up to and including in or about October 2010, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," and JESUS SANCHEZ, the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the racketeering enterprise charged in Count One of this Indictment and the racketeering conspiracy charged in Count Two of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crimes, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, some of which were discharged.

(Title 18, United States Code, Sections  
924(c)(1)(A)(iii), and 2.)

SPECIAL FINDINGS AS TO MANUEL GEOVANNY RODRIGUEZ-PEREZ

138. Counts Four, Five, Six, Seven, Eight, Nine, Ten, Eleven, Thirteen, Fourteen, Fifteen, Sixteen, Seventeen, Eighteen, Nineteen, Twenty, Twenty-One, and Twenty-Two of this

Indictment are re-alleged and incorporated by reference as though fully set forth herein. As to: (1) Counts Four, Five, and Six, alleging the murder of Francisco Perez, a/k/a "Francisco Rodriguez," a/k/a "Frank Diaz," a/k/a "Francie," in aid of racketeering (Count Four), while engaging in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A) (Count Five), and during and in relation to any crime of violence or drug trafficking crime (Count Six); (2) Counts Seven, Eight, and Nine, alleging the murder of Antonio Kasse, a/k/a "Antonio Kasse Checo," a/k/a "Antonio Casse," a/k/a "Rafael Alveraz," a/k/a "Toasty," a/k/a "Tony," in aid of racketeering (Count Seven), while engaging in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A) (Count Eight), and during and in relation to any crime of violence or drug trafficking crime (Count Nine); (3) Counts Ten and Eleven, alleging the murder of FNU LNU, a/k/a "Carlos Valentin," a/k/a "Campesino," a/k/a "Campi," in aid of racketeering (Count Ten), while engaging in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A) (Count Eleven); (4) Counts Thirteen, Fourteen, Fifteen, Sixteen, and Seventeen, alleging the murder of Wilfredo Molina, a/k/a "Willie," in aid of racketeering (Count Thirteen), for hire (Counts Fourteen and Fifteen), while engaging in an offense punishable under Title 21, United States Code, Section

841(b)(1)(A) (Count Sixteen), and during and in relation to any crime of violence or drug trafficking crime (Count Seventeen); and (5) Counts Eighteen, Nineteen, Twenty, Twenty-One, and Twenty-Two, alleging the murder of Richard Cabrera, a/k/a "Bori," in aid of racketeering (Count Eighteen), for hire (Counts Nineteen and Twenty), while engaging in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A) (Count Twenty-One), and during and in relation to any crime of violence or drug trafficking crime (Count Twenty-Two), the defendant MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro":

a. was 18 years of age or older at the time of the offenses;

b. intentionally killed "Carlos Valentin," (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally participated in acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and Francisco Perez, Antonio Kasse, "Carlos Valentin," Wilfredo Molina, and Richard Cabrera died as a direct result of the acts (Title 18, United States Code, Section 3591(a)(2)(C));

d. created a grave risk of death to one or more

persons in addition to the victim of the offense which resulted in the death of Antonio Kasse (Title 18, United States Code, Section 3592(c)(5));

e. committed the offense that resulted in the death of "Carlos Valentin" in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to the victim (Title 18, United States Code, Section 3592(c)(6));

f. procured the commission of the offense which resulted in the deaths of Francisco Perez, Antonio Kasse, Wilfredo Molina, and Richard Cabrera by payment, or promise of payment, of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(7));

g. committed the offense after substantial planning and premeditation to cause the deaths of Francisco Perez, Antonio Kasse, "Carlos Valentin," Wilfredo Molina, and Richard Cabrera (Title 18, United States Code, Section 3592(c)(9));

h. committed the offense which resulted in the deaths of Francisco Perez, Antonio Kasse, "Carlos Valentin," Wilfredo Molina, and Richard Cabrera in the course of engaging in a continuing criminal enterprise in violation of section 408(c) of the Controlled Substances Act (21 U.S.C. § 848(c)), and that violation involved the distribution of drugs to persons under the

age of 21 in violation of section 418 of that Act (21 U.S.C. § 859) (Title 18, United States Code, Section 3592(c)(13)).

SPECIAL FINDINGS AS TO FELIPE CANTRES-SANJURJO

139. Counts Thirteen, Fourteen, Fifteen, Sixteen, Seventeen, Eighteen, Nineteen, Twenty, Twenty-One, and Twenty-Two of this Indictment are re-alleged and incorporated by reference as though fully set forth herein. As to: (1) Counts Thirteen, Fourteen, Fifteen, Sixteen, and Seventeen, alleging the murder of Wilfredo Molina, a/k/a "Willie," in aid of racketeering (Count Thirteen), for hire (Counts Fourteen and Fifteen), while engaging in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A) (Count Sixteen), and during and in relation to any crime of violence or drug trafficking crime (Count Seventeen); and (2) Counts Eighteen, Nineteen, Twenty, Twenty-One, and Twenty-Two, alleging the murder of Richard Cabrera, a/k/a "Bori," in aid of racketeering (Count Eighteen), for hire (Counts Nineteen and Twenty), while engaging in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A) (Count Twenty-One), and during and in relation to any crime of violence or drug trafficking crime (Count Twenty-Two), the defendant FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres":

a. was 18 years of age or older at the time of the offenses;

b. intentionally killed Wilfredo Molina and Richard Cabrera (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of Wilfredo Molina and Richard Cabrera (Title 18, United States Code, Section 3591(a)(2)(B));

d. intentionally participated in acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and Wilfredo Molina and Richard Cabrera died as a direct result of the acts (Title 18, United States Code, Section 3591(a)(2)(C));

e. had previously been convicted of a federal or state offense punishable by a term of imprisonment of more than one year involving the use or attempted or threatened use of a firearm against another person (Title 18, United States Code, Section 3592(c)(2));

f. had previously been convicted of two or more federal or state offenses, punishable by a term of imprisonment of more than one year, committed on different occasions, involving the infliction of, or attempted infliction of, serious bodily injury or death upon another person (Title 18, United States Code, Section 3592(c)(4));

g. committed the offense which resulted in the deaths of Wilfredo Molina and Richard Cabrera as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(8)); and

h. committed the offense after substantial planning and premeditation to cause the death of Wilfredo Molina and Richard Cabrera (Title 18, United States Code, Section 3592(c)(9)).

SPECIAL FINDINGS AS TO MIGUEL CANTRES-SANJURJO

140. Counts Twelve, Thirteen, Fourteen, Fifteen, Sixteen, Seventeen, Eighteen, Nineteen, Twenty, Twenty-One, and Twenty-Two of this Indictment are re-alleged and incorporated by reference as though fully set forth herein. As to: (1) Count Twelve, alleging the murder of Jose Caba, a/k/a "Curly," during and in relation to any crime of violence or drug trafficking crime; and (2) Counts Thirteen, Fourteen, Fifteen, Sixteen, and Seventeen, alleging the murder of Wilfredo Molina, a/k/a "Willie," in aid of racketeering (Count Thirteen), for hire (Counts Fourteen and Fifteen), while engaging in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A) (Count Sixteen), and during and in relation to any crime of violence or drug trafficking crime (Count Seventeen), the defendant MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres,"

a/k/a "Bimbo":

a. was 18 years of age or older at the time of the offenses;

b. intentionally killed Jose Caba (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of Jose Caba (Title 18, United States Code, Section 3591(a)(2)(B));

d. intentionally participated in acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and Jose Caba and Wilfredo Molina died as a direct result of the acts (Title 18, United States Code, Section 3591(a)(2)(C));

e. had previously been convicted of a federal or state offense punishable by a term of imprisonment of more than one year involving the use or attempted or threatened use of a firearm against another person (Title 18, United States Code, Section 3592(c)(2));

f. committed the offense which resulted in the death of Wilfredo Molina as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(8)); and

g. committed the offense after substantial planning and premeditation to cause the death of Jose Caba and Wilfredo Molina (Title 18, United States Code, Section 3592(c)(9)).

**FORFEITURE ALLEGATION**  
**(Counts One and Two: RICO Offenses)**

141. The allegations contained in Counts One and Two of this Indictment are hereby repeated, realleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1963. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963 in the event of conviction under Counts One and/or Two of this Indictment.

142. MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," JOSE MANUEL ESPINAL, THEODORE JONES, a/k/a "Derrick Miles," a/k/a "Theo," a/k/a "Tito," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," OSCAR RODRIGUEZ, a/k/a

"Elias Rodriguez," a/k/a "Chang," a/k/a "Chan," and JESUS SANCHEZ, the defendants, each:

a. have acquired and maintained interests in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);

b. have an interest in, security of, claim against, and property and contractual rights which afford a source of influence over the enterprise named and described herein which each defendant established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(2); and/or

c. have property constituting and derived from proceeds obtained, directly and indirectly, from the aforesaid racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3).

143. The interests of the defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a) include, but are not limited to,

(i) at least \$25 million, which constitutes the approximate amount of gross proceeds received by the defendants derived from racketeering activities as alleged in Counts One and Two of this Indictment, and (ii) the following specific properties:

a. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 62 East 131 Street, New York, New York, 10037;

b. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 5051-5055 Broadway, New York, New York, 10034;

c. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1830 South Ocean Drive, #2302 Hallandale Beach, Florida, 33009;

d. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 8100 Geneva Court, Apartment 239, Doral, Florida 33166;

e. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 220 Northwest 129th Avenue, Miami, Florida 33182;

f. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 10045 Bay State Drive, Port Charlotte, Florida 33981;

g. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 2457 McKaig Street, Port Charlotte, Florida 33953;

h. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 8217 Portal Street, Port Charlotte, Florida 33981;

i. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 2373 Drennon Street, Port Charlotte, FL 33953;

j. approximately \$25,000 in United States currency seized on or about December 3, 2009, from MANUEL RODRIGUEZ in New York, New York;

k. approximately \$105,156 in United States currency seized on or about October 15, 2010, from 5400 Fieldston Road, Apartment 31E, Bronx, New York 10471;

l. approximately \$12,000 in United States currency seized on or about October 15, 2010, from 3206 Fairfield

Avenue, Apartment 3B, Bronx, New York 10463;

m. approximately \$2,404 in United States currency, 6 pieces of jewelry, a monogrammed Louis Vuitton shoulder bag, and 3 rifles seized on or about October 15, 2010, from MANUEL GEOVANNY RODRIGUEZ-PEREZ at 3 Brookridge Road, Unit 3, New Rochelle, New York 10804;

n. approximately \$60,001 in United States currency and ten pieces of gold jewelry seized on or about October 21, 2010, from safe deposit box number 90061-100-1941, registered to Belkis Rodriguez and Maria Rodriguez, at Banco Popular, 2852 Broadway, New York, New York 11207;

o. approximately \$54,790 in United States currency and twenty pieces of gold jewelry seized on or about October 21, 2010, from safe deposit box number 90061-100-1963, registered to Estela D. Rodriguez and Maria Rodriguez, at Banco Popular, 2852 Broadway, New York, New York 11207;

p. approximately \$298,109 in United States currency seized on or about October 15, 2010, from 220 Northwest 129th Avenue, Miami, Florida 33182;

q. approximately \$10,000 in United States currency and two pieces of jewelry seized on or about October 26, 2010, from safe deposit box number 277, registered to Maira Sanchez and Alexander Sanchez, at JPMorgan Chase Bank, International Mall Branch, 10495 Northwest 12th Street, Miami,

Florida 33172; and

r. approximately 16 pieces of jewelry seized on or about October 26, 2010, from safe deposit box number 210, registered in the names Maira Sanchez and Jesus Sanchez, at JPMorgan Chase Bank, International Mall Branch, 10495 Northwest 12th Street, Miami, Florida 33172.

Substitute Assets Provision

144. 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 18, United States Code, Section 1963(m), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 1963.)

**FORFEITURE ALLEGATION**  
**(Count Three: Narcotics Conspiracy)**

145. As a result of committing the controlled substance offense alleged in Count Three of this Indictment, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," FELIPE CANTRES-SANJURJO, a/k/a "Felipe Cantres," MIGUEL CANTRES-SANJURJO, a/k/a "Miguel Cantres," a/k/a "Manuel Cantres," a/k/a "Bimbo," THEODORE JONES, a/k/a "Derrick Miles," a/k/a "Theo," a/k/a "Tito," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," OSCAR RODRIGUEZ, a/k/a "Elias Rodriguez," a/k/a "Chang," a/k/a "Chan," and JESUS SANCHEZ, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, all property constituting and derived from any proceeds the defendants obtained, directly and indirectly, as the result of the offense, and any property used and intended to be used in any manner and part to commit and to facilitate the commission of the offense alleged in Count Three, including, but not limited to, (i) a sum in United States currency representing the amount of all proceeds obtained as a result of the controlled substance offense alleged in Count Three of the Indictment; and (ii) the properties identified in Paragraph 143 of this Indictment.

Substitute Assets Provision

146. If any of the property described in Paragraph 145 above as being subject to forfeiture, 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 intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

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

FORFEITURE ALLEGATION

(Counts Twenty-Six, Twenty-Eight, and Twenty-Nine: Money Laundering Conspiracies)

147. As a result of committing the offense of conspiracy to launder money, as alleged in Counts Twenty-Six, Twenty-Eight, and Twenty-Nine of this Indictment, MANUEL GEOVANNY

RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE MANUEL ESPINAL, JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," ORLANDO RODRIGUEZ, a/k/a "Ramon A. Perez," a/k/a "Luca," a/k/a "Lucas," and JESUS SANCHEZ, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1)(A), all property, real and personal, involved in the offense and all property traceable to such property, including, but not limited to, the properties identified in Paragraph 143 of this Indictment.

Substitute Assets Provision

148. If any of the property described in Paragraph 147 above as being subject to forfeiture, as a result of any act or omission of the defendant:

- 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 intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982.)

**FORFEITURE ALLEGATION**

**(Count Twenty-Seven: Bank Fraud Conspiracy)**

149. As a result of committing the offense of conspiracy to commit bank fraud, as alleged in Count Twenty-Seven of this Indictment, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," and JESUS SANCHEZ, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982, any property constituting or derived from proceeds obtained directly or indirectly as a result of the conspiracy to commit bank fraud offense alleged in Count Twenty-Seven of this Indictment, including, but not limited to, the properties identified in Paragraph 143(c) and (e) of this Indictment.

**Substitute Assets Provision**

150. If any of the property described in Paragraph 149 above as being subject to forfeiture, 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 intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982.)

**FORFEITURE ALLEGATION**

**(Counts Thirty through Thirty-Three: Travel in Interstate and Foreign Commerce in Aid of Racketeering)**

151. As a result of committing the offense of interstate transportation in aid of racketeering, as alleged in Counts Thirty through Thirty-Three of this Indictment, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manuel Rodriguez," a/k/a "Andres Garcia," a/k/a "Manny," a/k/a "Shorty," a/k/a "El Monstro," JOSE A. RODRIGUEZ, a/k/a "Viejo," a/k/a "Danielo," a/k/a "Daniel," a/k/a "Tio," a/k/a "Loco Loco," ORLANDO RODRIGUEZ, a/k/a "Ramon

A. Perez," a/k/a "Luca," a/k/a "Lucas," and JESUS SANCHEZ, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, constituting or derived from proceeds traceable to the commission of the offense.

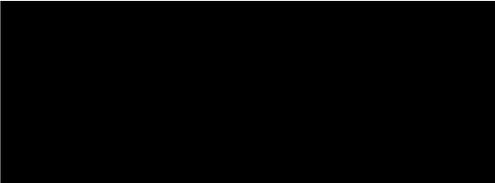
Substitute Assets Provision

152. If any of the property described in Paragraph 151 above as being subject to forfeiture, 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 intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982.)



*Preet Bharara*

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PREET BHARARA  
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. -

MANUEL GEOVANNY RODRIGUEZ-PEREZ,  
a/k/a "Manuel Rodriguez," a/k/a "Andres  
Garcia," a/k/a "Manny," a/k/a "Shorty,"  
a/k/a "El Monstro,"  
FELIPE CANTRES-SANJURJO,  
a/k/a "Felipe Cantres,"  
MIGUEL CANTRES-SANJURJO,  
a/k/a "Miguel Cantres," a/k/a "Manuel  
Cantres," a/k/a "Bimbo,"  
JOSE MANUEL ESPINAL,  
THEODORE JONES, a/k/a "Derrick Miles,"  
a/k/a "Theo," a/k/a "Tito,"  
JOSE A. RODRIGUEZ,  
a/k/a "Viejo," a/k/a "Danielo," a/k/a  
"Daniel," a/k/a "Tio," a/k/a "Loco Loco,"  
ORLANDO RODRIGUEZ,  
a/k/a "Ramon A. Perez," a/k/a "Luca,"  
a/k/a "Lucas,"  
OSCAR RODRIGUEZ,  
a/k/a "Chang," a/k/a "Chan," and  
JESUS SANCHEZ,

Defendants.

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SEALED  
SUPERSEDING INDICTMENT

S31 10 Cr. 905 (LTS)

(18 U.S.C. §§ 2, 924(c), 924(j), 1001,  
1344, 1349, 1512, 1952, 1956, 1957,  
1958, 1959, 1961, 1962;  
and 21 U.S.C. §§ 846, 848(e).)

PREET BHARARA

United States Attorney.

A TRUE BILL

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