

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
JAIME BONILLA HERNANDEZ	:	VIOLATIONS:
RONALD BARRIENTOS HEREDIA	:	21 U.S.C. § 846 (conspiracy and attempt to possess with intent to distribute 500 grams or more of cocaine - 2 counts)
	:	21 U.S.C. § 960 (importing 500 grams or more of cocaine - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From in or about June, 2008, through on or about July 9, 2008, in Coatesville, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JAIME BONILLA HERNANDEZ and
RONALD BARRIENTOS HEREDIA**

conspired and agreed, together and with others unknown to the grand jury, to knowingly and intentionally possess with intent to distribute 500 grams or more, that is, approximately one kilogram, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

MANNER AND MEANS

It was a part of the conspiracy that:

1. Defendant RONALD BARRIENTOS HEREDIA arranged for the shipment of cocaine to defendant JAIME BONILLA HERNANDEZ from a source in Guatemala unknown to the grand jury.

2. The source concealed the cocaine in a package addressed to defendant JAIME BONILLA HERNANDEZ, which was then sent to defendant BONILLA HERNANDEZ via a courier service.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants JAIME BONILLA HERNANDEZ and RONALD BARRIENTOS HEREDIA committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. In or about June or July, 2008, defendant RONALD BARRIENTOS HEREDIA contacted a source in Guatemala and arranged for the shipment of approximately one kilogram of cocaine, which was concealed inside two wooden plaques in a package sent to defendant JAIME BONILLA HERNANDEZ using a courier service.

2. On or about July 9, 2008, defendant JAIME BONILLA HERNANDEZ received and signed for the package.

3. On or about July 9, 2008, after receiving the package, defendant JAIME BONILLA HERNANDEZ contacted defendant RONALD BARRIENTOS HEREDIA to inform him that the package had arrived.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

In or about June or July, 2008, in Coatesville, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JAIME BONILLA HERNANDEZ and
RONALD BARRIENTOS HEREDIA**

knowingly and intentionally imported, and aided and abetted the importation of, 500 grams or more, that is, approximately one kilogram, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, into the United States from a place outside the United States, that is, Guatemala.

In violation of Title 21, United States Code, Sections 952(a) and 960(a)(1), (b)(2)(B), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 9, 2008, in Coatesville, in the Eastern District of Pennsylvania,
defendants

**JAIME BONILLA HERNANDEZ and
RONALD BARRIENTOS HEREDIA**

knowingly and intentionally attempted to possess with intent to distribute 500 grams or more,
that is, approximately one kilogram, of a mixture and substance containing a detectable amount
of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code,
Section 841(a)(1), (b)(1)(B).

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

A TRUE BILL:

GRAND JURY FOREPERSON

LAURIE MAGID
Acting United States Attorney