

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>08 - _____</u>
v.	:	DATE FILED: _____
DINOEL RODRIGUEZ-NUNEZ	:	VIOLATIONS:
HIRAM COIRA-SOTO,	:	21 U.S.C. § 841(a)(1) (possession with
a/k/a “Morrissette,” and	:	intent to distribute 100 grams or more of
DOMINGO MERCADO	:	heroin - 1 count)
	:	21 U.S.C. § 860 (possession with intent to
	:	distribute 100 grams or more of heroin
	:	within 1,000 feet of a school - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 14, 2008, in Philadelphia in the Eastern District of
Pennsylvania, defendants

**DINOEL RODRIGUEZ-NUNEZ,
HIRAM COIRA-SOTO,
 a/k/a “Morrissette,” and
DOMINGO MERCADO**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the
possession with intent to distribute, 100 grams or more, that is, approximately 230 grams, of a
mixture and substance containing a detectable amount of heroin, a Schedule I controlled
substance.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 14, 2008, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**DINOEL RODRIGUEZ-NUNEZ,
HIRAM COIRA-SOTO,
a/k/a “Morrissette,” and
DOMINGO MERCADO**

knowingly and intelligently possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 100 grams or more, that is, approximately 230 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1000 feet of the real property comprising John B. Stetson Middle School, a public middle school, located at 3200 B Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B) and 860, set forth in this indictment, defendants

**DINOEL RODRIGUEZ-NUNEZ,
HIRAM COIRA-SOTO
a/k/a/ "Morrissette," and
DOMINGO MERCADO**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including but not limited to:

1. One Ford Taurus automobile, vehicle identification number 1FAHP56SG127288, and

2. One GMC Envoy automobile, vehicle identification number 1GKDT13S932401720;

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses.

2. If any of the property 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, or deposited with, a third party;
- (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 divided
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 property of said defendants up to the value of the above forfeitable
property.

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

A TRUE BILL:

FOREPERSON

LAURIE MAGID
Acting United States Attorney