

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
STEVEN J. SANTANA, JR., a/k/a "Tec,"	:	VIOLATIONS:
LAMEEK STATON, a/k/a "Carter,"	:	21 U.S.C. § 846 (conspiracy to distribute 50 grams or more of cocaine base
SAMUEL VALLES, a/k/a "TS,"	:	("crack") and heroin - 1 count)
LUIS BERRIOS, a/k/a "Big Lou,"	:	21 U.S.C. § 841(a)(1) (distribution of 50 grams or more of cocaine base ("crack")
JOSE OLMEDA, a/k/a "Chuckie,"	:	- 1 count)
CORI DEVAULT, a/k/a "Red,"	:	21 U.S.C. § 841(a)(1) (distribution of 5 grams or more of cocaine base
DESHANTE LEWIS, a/k/a "Face,"	:	("crack") - 10 counts)
ELVIN PEREZ, a/k/a "JB,"	:	21 U.S.C. § 841(a)(1) (distribution of heroin - 1 count)
OMAR SHIVERS-SPENCER, a/k/a "O"	:	18 U.S.C. § 924(c) (possession of a firearm in furtherance of a drug
	:	trafficking crime - 1 count)
	:	18 U.S.C. § 922(d)(1) (selling a firearm to a convicted felon - 1 count)
	:	18 U.S.C. § 922(g)(1) (possession of a firearm and ammunition by a convicted
	:	felon - 3 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about February 2009, to in or about the present, in Reading, in the Eastern District of Pennsylvania, and elsewhere, defendants

**STEVEN J. SANTANA, JR.,
a/k/a "Tec,"
LAMEEK STATON,
a/k/a "Carter,"
SAMUEL VALLES,
a/k/a "TS,"
LUIS BERRIOS,
a/k/a "Big Lou,"
JOSE OLMEDA,
a/k/a "Chuckie,"
CORI DEVAULT,
a/k/a "Red,"
DESHANTE LEWIS,
a/k/a "Face,"and
ELVIN PEREZ,
a/k/a "JB,"**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 50 grams or more, that is, at least 300 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), (b)(1)(C).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant STEVEN J. SANTANA, JR. was the organizer, supervisor, and manager of a drug trafficking organization, referred to here as the SANTANA DRUG TRAFFICKING ORGANIZATION (SDTO), which purchased and sold illegal controlled substances, including crack cocaine and heroin, in the city of Reading and elsewhere. Defendant SANTANA obtained illegal controlled substances, including crack cocaine and heroin, from suppliers, in New York City, New York and elsewhere, which were processed, packaged, and sold by or at the direction of defendant SANTANA. On occasion, defendant SANTANA personally sold and delivered crack cocaine and heroin to others, and also employed workers, known and unknown to the grand jury, to process, package and sell crack cocaine and heroin as part of the SDTO. Defendant SANTANA also possessed firearms to use to protect the SDTO from rival drug traffickers.

3. Defendant STEVEN J. SANTANA, JR. stored or caused others to store crack cocaine and heroin in various locations referred to as "labs" in Reading and in other locations in Berks County, Pennsylvania.

4. Defendant LAMEEK STATON was a member of the SDTO, who assisted defendant STEVEN J. SANTANA, JR. in obtaining drugs from suppliers. Defendant STATON also processed and packaged drugs for further distribution by SANTANA and other conspirators, in addition to having a separate drug distribution business.

5. Defendants STEVEN J. SANTANA, JR., SAMUEL VALLES, and LAMEEK STATON regularly drove from the Eastern District of Pennsylvania to various

locations in New York City to buy or pick up cocaine and heroin, and drove back to the Reading area with supplies of drugs.

6. In Reading, defendant LUIS BERRIOS was a member of the SDTO and was involved in processing drugs for the SDTO for further sale, including "cooking" cocaine into crack cocaine, and packaging heroin and crack cocaine for sale to SDTO customers,

7. Defendant SAMUEL VALLES was a member of the SDTO and performed various tasks for the SDTO at the direction of defendant STEVEN J. SANTANA, JR., including delivering controlled substances to customers and collecting proceeds from drug sales.

8. Defendants CORI DEVAULT and DESHANTE LEWIS were members of the SDTO and obtained controlled substances, including heroin, for sale to customers in various quantities, including user quantities.

9. Defendants JOSE OLMEDA and ELVIN PEREZ were members of the SDTO, who sold controlled substances at the direction of defendant STEVEN J. SANTANA, JR., accompanied defendant SANTANA to drug deliveries, processed controlled substances for further distribution, and at times acted as drivers for SANTANA.

10. Defendants STEVEN J. SANTANA, JR., SAMUEL VALLES, LUIS BERRIOS, JOSE OLMEDA, CORI DEVAULT, DESHANTE LEWIS, ELVIN PEREZ, and others known and unknown to the grand jury, met with each other and with drug customers to arrange the delivery of crack cocaine and heroin in various quantities.

11. Members of the SDTO routinely used cellular telephones to arrange meeting locations for distributing controlled substances to one another and others known and

unknown to the grand jury, and for other purposes, such as negotiating prices or making payment arrangements.

12. Members of the SDTO regularly used coded language when speaking with each other over the telephone, and when completing drug transactions with customers, engaged in counter-surveillance actions, and carried out transactions inside vehicles, private homes, and other difficult to surveill locations in order to thwart detection of their unlawful activities by law enforcement.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants STEVEN J. SANTANA, JR., LAMEEK STATON, SAMUEL VALLES, LUIS BERRIOS, JOSE OLMEDA, CORI DEVAULT, DESHANTE LEWIS, and ELVIN PEREZ, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

The March 4, 2009 Sale of Approximately 11.2 Grams of Crack Cocaine

On or about March 4, 2009:

1. Defendant JOSE OLMEDA called Person #1 known to the grand jury (Person #1) to return a message Person #1 had left for defendant STEVEN J. SANTANA, JR. Defendant OLMEDA and Person #1 discussed defendant SANTANA's whereabouts for the purposes of purchasing drugs.
2. Defendant STEVEN J. SANTANA, JR. and Person #1 subsequently spoke by cellphone during which they discussed the sale by SANTANA of "ballies" (3.5 grams of "crack") to Person #1. Defendant SANTANA arranged to meet with Person #1 at a specified location in Reading.
3. Later the same day, defendant STEVEN J. SANTANA, JR. drove to the agreed upon location carrying a firearm. Person #1 entered defendant SANTANA's vehicle and SANTANA handed Person #1 four clear plastic baggies containing approximately 11.2 grams of crack cocaine, and was paid approximately \$280 in cash.

The April 14, 2009 Sale of Approximately 10.0 Grams of Crack Cocaine

On or about April 14, 2009:

4. When defendant STEVEN J. SANTANA, JR. received a call on his cell phone from Person #1, who was interested in purchasing crack cocaine, defendant SANTANA agreed to meet Person #1 at a specified location in Wyomissing, Pennsylvania.

5. After defendant STEVEN J. SANTANA, JR. drove to the agreed upon location in Wyomissing, Person #1 entered defendant SANTANA's vehicle and SANTANA handed Person #1 three plastic baggies containing approximately 10.0 grams of crack cocaine and was paid approximately \$420 in cash.

The June 2, 2009 Sale of Approximately 13.4 Grams of Crack Cocaine

On or about June 2, 2009:

6. When defendant STEVEN J. SANTANA, JR. received a call on his cell phone from Person #1, who was interested in purchasing crack cocaine, defendant SANTANA agreed to meet Person #1 at a specified location in Reading.

7. Later the same day, defendant ELVIN PEREZ drove defendant STEVEN J. SANTANA, JR. to the agreed upon location, where Person #1 got into the car with them.

8. Defendant STEVEN J. SANTANA, JR. agreed to sell one-half ounce of crack cocaine to Person #1 and defendant SANTANA handed Person #1 a plastic bag containing approximately 13.4 grams of crack cocaine and was paid approximately \$540 in cash.

The September 9, 2009 Sale of Approximately 9.6 Grams of Crack Cocaine

On or about September 9, 2009:

9. Defendant STEVEN J. SANTANA, JR. spoke with Person #2 known to the grand jury (Person #2) on his cell and agreed to sell Person #2 crack cocaine at a specified location in Reading, Pennsylvania.

10. Later the same day, defendant SAMUEL VALLES drove defendant STEVEN J. SANTANA, JR. to the agreed-upon location, where defendant SANTANA got into Person #2's car, handed a plastic bag containing approximately 9.6 grams of crack cocaine to Person #2, and was paid approximately \$400 in cash.

The September 16, 2009 Sale of Approximately 26.8 Grams of Crack Cocaine

On or about September 16, 2009:

11. Defendant STEVEN J. SANTANA, JR. and Person #2 spoke by cellphone and arranged the sale of crack cocaine at a specified location in Reading, Pennsylvania.

12. Defendant SAMUEL VALLES drove defendant STEVEN J. SANTANA, JR. and an unidentified woman, to the agreed-upon location, where defendant SANTANA entered Person #2's car, handed Person #2 a clear plastic bag containing approximately 26.8 grams of crack cocaine, and was paid approximately \$1,100.

The September 29, 2009 Sale of Approximately 26.5 Grams of Crack Cocaine

On or about September 29, 2009:

13. Defendant STEVEN J. SANTANA, JR. and Person #2 spoke by cellphone and arranged the sale of crack cocaine at a specified location in Reading, Pennsylvania in five minutes.

14. When defendant STEVEN J. SANTANA, JR. arrived at the agreed-upon location, Person #2 got into his car, where defendant SANTANA delivered a plastic bag containing approximately 26.5 grams of "crack" cocaine in exchange for \$1,100.

15. During the drug transaction, defendant STEVEN J. SANTANA, JR. showed a firearm to Person #2 and stated that it was his personal firearm.

The November 10, 2009 Sale of Approximately 54.2 Grams of Crack Cocaine

On November 10, 2009:

16. Defendant STEVEN J. SANTANA, JR. and Person #2 spoke by cellphone and discussed the sale of approximately two ounces of crack cocaine at a specified location in Reading, Pennsylvania in five minutes.

17. Shortly thereafter, at 9th and Spring Streets, defendant STEVEN J. SANTANA, JR. drove to the agreed-upon location in his minivan. Defendant SANTANA introduced Person #2 to defendants SAMUEL VALLES and ELVIN PEREZ, then handed Person #2 a plastic bag containing two baggies of "crack" cocaine, with a combined weight of approximately 54.2 grams, and was paid approximately \$2,200 in cash. Defendant SANTANA told Person #2 that the crack cocaine had been cooked recently and might be a little soft.

The December 1, 2009 Sale of Approximately 26.1 Grams of Crack Cocaine

On December 1, 2009:

18. Defendant STEVEN J. SANTANA, JR. and Person #2 spoke by cellphone and discussed the sale of approximately of crack cocaine at a specified location in Reading, Pennsylvania.

19. Defendant STEVEN J. SANTANA, JR. drove to the agreed-upon location, where Person #2 got into defendant SANTANA's vehicle and discussed heroin and firearms. During the conversation, defendant SANTANA handed Person #2 a plastic bag containing approximately 26.1 grams of crack cocaine and was paid approximately \$1,100 in cash.

The January 20, 2010 Sale of Approximately 27 Grams of Crack Cocaine

On or about January 20, 2010:

20. Defendant STEVEN J. SANTANA, JR. and Person #2 spoke by cellphone and discussed the sale of approximately of crack cocaine at a specified location in Reading, Pennsylvania in 15 minutes.

21. Defendant STEVEN J. SANTANA, JR. and Person #3 known to the grand jury (Person #3) drove to the agreed-upon location. When Person #2 got into defendant SANTANA's minivan, defendant SANTANA supplied Person #2 with approximately 27 grams of crack cocaine and was paid approximately \$1,100 in cash.

The February 15, 2010 Sale of Approximately 12.2 Grams of Heroin

On February 15, 2010:

22. Defendant STEVEN J. SANTANA, JR. called Person #2 and arranged to meet at a specified location in Reading, Pennsylvania, in five minutes to sell heroin.

23. After defendant STEVEN J. SANTANA, JR. drove to the agreed-upon location, he handed Person #2 a plastic bag containing approximately 12.2 grams of heroin and was paid approximately \$700 in cash.

The March 5, 2010 Sale of Approximately 26.9 Grams of Crack Cocaine

On or about March 5, 2010:

24. Defendant STEVEN J. SANTANA, JR. and Person #2 arranged to meet at a specified location in Reading, Pennsylvania.

25. When defendant STEVEN J. SANTANA, JR. and Person #4 unknown to the grand jury drove to the agreed-upon location, Person #2 got into the car, and defendant SANTANA handed approximately 26.9 grams of crack cocaine and was paid approximately \$1,100 in cash.

The May 11, 2010 Sale of Approximately 28 Grams of Crack Cocaine

On or about May 11, 2010:

26. When Person #2 called defendant STEVEN J. SANTANA, JR. to arrange the purchase of crack cocaine, defendant SANTANA referred Person #2 to defendant JOSE OLMEDA.

27. Defendant JOSE OLMEDA subsequently agreed to meet at a specified location in Reading.

28. Defendant JOSE OLMEDA drove to the agreed-upon location in defendant SANTANA's minivan, and entered Person #2's vehicle, where defendant OLMEDA handed Person #2 a plastic bag containing approximately 27.2 grams of crack cocaine and was paid approximately \$1,100 in cash.

29. On or about March 19, 2010, defendant SAMUEL VALLES picked up a quantity of heroin from defendant STEVEN J. SANTANA, JR. and delivered it to defendant CORI DEVAULT at a location in the 900 block of Hill Avenue in Reading, Pennsylvania.

30. On or about March 31, 2010, defendant LUIS BERRIOS met with defendant LAMEEK STATON in the 800 block of Oley Street in Reading, Pennsylvania, to pick up money owed from drug transactions.

31. On or about April 1, 2010, defendant LAMEEK STATON arranged a meeting between defendant STEVEN J. SANTANA, JR. and Person #5 known to the grand jury. At the meeting, defendant SANTANA delivered a quantity of controlled substance to Person #5.

32. On or about April 12, 2010, at the direction of defendant STEVEN J. SANTANA, JR., defendant SAMUEL VALLES delivered packaging material to defendant LUIS BERRIOS.

33. On or about May 12, 2010, defendant STEVEN J. SANTANA, JR. sent defendant SAMUEL VALLES to New York City to meet with defendant LAMEEK STATON to pick up a quantity of heroin and to deliver money.

34. On or about May 22, 2010, defendant DESHANTE LEWIS drove defendant STEVEN J. SANTANA, JR. to a location on 5th Street in Reading, Pennsylvania, to meet with a customer of the SDTO.

35. On or about May 29, 2010, defendants DESHANTE LEWIS and STEVEN J. SANTANA, JR. drove to Harrisburg and York, Pennsylvania in furtherance of the drug distribution business.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 12, and Overt Acts 1 through 3 of Count One of this indictment are incorporated here.

2. On or about March 4, 2009, in Berks County, in the Eastern District of Pennsylvania, defendants

**STEVEN J. SANTANA, JR.,
a/k/a "Tec," and
JOSE OLMEDA,
a/k/a "Chuckie,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 11.2 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II 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 THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 12, and Overt Acts 4 and 5 of Count One of this indictment are incorporated here.

2. On or about April 14, 2009, in Berks County, in the Eastern District of Pennsylvania, defendant

**STEVEN J. SANTANA, JR.,
a/k/a "Tec,"**

knowingly and intentionally distributed 5 grams or more, that is, approximately 10 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 12, and Overt Acts 6 through 8 of Count One of this indictment are incorporated here.

2. On or about June 2, 2009, in Berks County, in the Eastern District of Pennsylvania, defendants

**STEVEN J. SANTANA, JR.,
a/k/a "Tec," and
ELVIN PEREZ,
a/k/a "JB,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 13.4 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II 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 FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 12, and Overt Acts 9 and 10 of Count One of this indictment are incorporated here.

2. On or about September 9, 2009, in Berks County, in the Eastern District of Pennsylvania, defendants

**STEVEN J. SANTANA, JR.,
a/k/a "Tec," and
SAMUEL VALLES,
a/k/a "TS,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 9.6 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II 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 SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 12, and Overt Acts 11 and 12 of Count One of this indictment are incorporated here.
2. On or about September 16, 2009, in Berks County, in the Eastern District of Pennsylvania, defendants

**STEVEN J. SANTANA, JR.,
a/k/a "Tec," and
SAMUEL VALLES,
a/k/a "TS,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 26.8 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II 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 SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 12, and Overt Acts 13 through 15 of Count One of this indictment are incorporated here.

2. On or about September 29, 2009, in Berks County, in the Eastern District of Pennsylvania, defendants

**STEVEN J. SANTANA, JR.,
a/k/a "Tec,"**

knowingly and intentionally distributed 5 grams or more, that is, approximately 26.5 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 12, and Overt Acts 16 and 17 of Count One of this indictment are incorporated here.

2. On or about November 10, 2009, in Berks County, in the Eastern District of Pennsylvania, defendants

**STEVEN J. SANTANA, JR.,
a/k/a "Tec,"
SAMUEL VALLES,
a/k/a "TS," and
ELVIN PEREZ,
a/k/a "JB,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 50 grams or more, that is, approximately 54.2 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 12, and Overt Acts 18 and 19 of Count One of this indictment are incorporated here.

2. On or about December 1, 2009, in Berks County, in the Eastern District of Pennsylvania, defendant

**STEVEN J. SANTANA, JR.,
a/k/a "Tec,"**

knowingly and intentionally distributed 5 grams or more, that is, approximately 26.1 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 12, and Overt Acts 20 and 21 of Count One of this indictment are incorporated here.

2. On or about January 20, 2010, in Berks County, in the Eastern District of Pennsylvania, defendants

**STEVEN J. SANTANA, JR.,
a/k/a "Tec,"**

knowingly and intentionally distributed 5 grams or more, that is, approximately 27 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 12, and Overt Acts 22 and 23 of Count One of this indictment are incorporated here.

2. On or about February 15, 2010, in Berks County, in the Eastern District of Pennsylvania, defendant

**STEVEN J. SANTANA, JR.,
a/k/a "Tec,"**

knowingly and intentionally distributed approximately 12.1 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)(C).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 12, and Overt Acts 24 and 25 of Count One of this indictment are incorporated here.

2. On or about March 5, 2010, in Berks County, in the Eastern District of Pennsylvania, defendants

**STEVEN J. SANTANA, JR.,
a/k/a "Tec,"**

knowingly and intentionally distributed 5 grams or more, that is, approximately 26.9 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

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

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 12, and Overt Acts 26 through 28 of Count One of this indictment are incorporated here.

2. On or about May 11, 2010, in Berks County, in the Eastern District of Pennsylvania, defendants

**STEVEN J. SANTANA, JR.,
a/k/a "Tec," and
JOSE OLMEDA,
a/k/a "Chuckie,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 27.2 grams, of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II 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 FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 12 of Count One of this indictment are incorporated here.

2. From in or about March 2009, in Berks County, in the Eastern District of Pennsylvania, and elsewhere, defendant

**STEVEN J. SANTANA, JR.,
a/k/a "Tec"**

knowingly possessed a firearm, that is, a chrome and black .45 caliber handgun, and a second .45 caliber handgun, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Section 846.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 19, 2009, in Berks County, in the Eastern District of Pennsylvania, defendants

**STEVEN J. SANTANA, JR.,
a/k/a "Tec," and
OMAR SHIVERS-SPENCER,
a/k/a "O"**

sold and otherwise disposed of, and aided and abetted the sale and disposal of, a firearm, that is, a Hopkins and Allen .32 caliber revolver with no serial number visible on its surface, to Person #1 known to the grand jury, knowing and having reasonable cause to believe that Person #1 had previously been convicted of a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Sections 922(d)(1), 924(a)(2), and 2.

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 19, 2009, in Berks County, in the Eastern District of Pennsylvania, defendant

**STEVEN J. SANTANA, JR.,
a/k/a "Tec," and
OMAR SHIVERS-SPENCER,
a/k/a "O,"**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, and aided and abetted the possession of, in and affecting interstate and foreign commerce a firearm, that is, a Hopkins and Allen .32 caliber revolver, with no serial number visible on its surface.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 22, 2009, in Berks County, in the Eastern District of Pennsylvania, defendant

**STEVEN J. SANTANA, JR.,
a/k/a "Tec,"**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Colt Cobra .38 Special revolver, serial number F84295, loaded with six live rounds.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 3, 2010, in Hamburg, in the Eastern District of Pennsylvania, defendant

**STEVEN J. SANTANA, JR.,
a/k/a "Tec,"**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce ammunition, that is, a box of Winchester .45 caliber rounds.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

(21 U.S.C. § 853)

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), set forth in this indictment, defendants

**STEVEN J. SANTANA, JR.,
a/k/a "Tec,"
LAMEEK STATON,
a/k/a "Carter,"
SAMUEL VALLES,
a/k/a "TS,"
LUIS BERRIOS,
a/k/a "Big Lou,"
JOSE OLMEDA,
a/k/a "Chuckie,"
CORI DEVAULT,
a/k/a "Red,"
DESHANTE LEWIS,
a/k/a "Face,"and
ELVIN PEREZ,
a/k/a "JB,"**

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; and

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

2. If any of the property, 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 to, sold to, or deposited with a third party;

(c) has been placed beyond the jurisdiction of this 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 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property.

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

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney