

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

UNITED STATES OF AMERICA	:	DATE FILED: _____
v.	:	CRIMINAL NO. _____
ALFREDO SIERRA LANDIS, a/k/a "King Posse," EDWIN RODRIGUEZ, a/k/a "Fresh," LAYANO SIERRA LANDIS WILSON VIGO MARIA VIGO	:	VIOLATIONS: 21 U.S.C. § 846 (conspiracy to distribute 50 grams of more of cocaine base ("crack") - 1 count) 21 U.S.C. § 841(a)(1) (distribution of cocaine base ("crack") - 23 counts) 21 U.S.C. § 841(a)(1) (distribution of cocaine - 1 count) 21 U.S.C. § 841(a)(1) (distribution of marijuana - 6 counts) 21 U.S.C. § 860(a) (distribution of a controlled substance within 1000 feet of a school - 30 counts) 18 U.S.C. § 924(c)(1) (possession of a firearm in furtherance of drug trafficking crime - 2 counts) 21 U.S.C. § 856 (maintaining a residence to distribute and store controlled substances - 1 count) 18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about July 9, 2009, to on or about April 28, 2010, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ALFREDO SIERRA LANDIS,
a/k/a "King Posse,"
EDWIN RODRIGUEZ,
a/k/a "Fresh,"**

**LAYANO SIERRA LANDIS,
WILSON VIGO, and
MARIA VIGO**

conspired and agreed, together and with persons known and unknown to the grand jury, to knowingly and intentionally distribute controlled substances, namely 50 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack” and “crack cocaine”), a Schedule II controlled substance; a mixture and substance containing a detectable amount of cocaine (cocaine and “powder cocaine”), a Schedule II controlled substance; and a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), (b)(1)(C), and (b)(1)(D).

MANNER AND MEANS

It was part of the conspiracy that:

3. Defendant ALFREDO SIERRA LANDIS established an illegal drug trafficking operation, based from a house located at 807 North Eighth Street in Allentown, Pennsylvania. As part of this illegal drug trafficking operation, defendant LANDIS obtained crack cocaine, powder cocaine, and marijuana from suppliers for resale to his customers.

4. Defendant ALFREDO SIERRA LANDIS, with the assistance of defendants EDWIN RODRIGUEZ, LAYANO SIERRA LANDIS, WILSON VIGO, and MARIA VIGO, and others known and unknown to the grand jury, delivered crack cocaine, powder cocaine, and marijuana to Person #1 known to the grand jury (Person #1), and others unknown to the grand jury, in exchange for U.S. currency in the form of cash.

_____ 5. On various occasions, including, but not limited to drug transactions, the defendants ALFREDO SIERRA LANDIS, EDWIN RODRIGUEZ, and LAYANO SIERRA LANDIS possessed firearms to protect their drug trafficking operation.

_____ 6. Defendants ALFREDO SIERRA LANDIS, EDWIN RODRIGUEZ, LAYANO SIERRA LANDIS, WILSON VIGO, and MARIA VIGO, and others known and unknown to the grand jury, routinely sold illegal controlled substances, including crack cocaine, powder cocaine, and marijuana at locations within 1,000 feet of the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania.

7. Defendants ALFREDO SIERRA LANDIS, EDWIN RODRIGUEZ, LAYANO SIERRA LANDIS, WILSON VIGO, and MARIA VIGO, communicated with each other and with others known and unknown to the grand jury, including customers to arrange drug transactions and deliveries of illegal controlled substances.

8. From at least in or about July 2009 to in or about August 2009, defendants WILSON VIGO and MARIA VIGO were residents and lessees of the house, located at 807 North Eighth Street in Allentown, Pennsylvania. They permitted defendants ALFREDO SIERRA LANDIS, EDWIN RODRIGUEZ, and LAYANO SIERRA LANDIS to use the house as the base of drug trafficking operations and, on occasion, assisted the other defendants in the drug trafficking operation.

9. Beginning in or about August 2009, defendant ALFREDO SIERRA LANDIS took over the control of the house at 807 North 8th Street in Allentown and continued to use it as the base of his drug operation. Defendant LANDIS caused the installation of a video

surveillance system to detect the presence of law enforcement, customers, and potential threats to their drug trafficking operation.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants ALFREDO SIERRA LANDIS, EDWIN RODRIGUEZ, LAYANO SIERRA LANDIS, WILSON VIGO, and MARIA VIGO, 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 July 9, 2009 Sale of Crack Cocaine

_____ On or about July 9, 2009:

1. Defendant ALFREDO SIERRA LANDIS agreed to arrange the sale of crack cocaine to Person #1 at 807 North Eighth Street in Allentown, Pennsylvania, and informed Person #1 that defendant WILSON VIGO would provide the crack cocaine to Person #1.

2. Later that same day, at 807 North Eighth Street, defendant WILSON VIGO delivered approximately 1.3 grams of crack cocaine to Person #1, in exchange for cash.

The July 18, 2009 Sale of Crack Cocaine

On or about July 18, 2009:

3. Defendant ALFREDO SIERRA LANDIS met Person #1 at 807 North Eighth Street in Allentown and agreed to sell Person #1 crack cocaine. At the direction of defendant LANDIS, defendant WILSON VIGO retrieved approximately 1.8 grams crack cocaine and gave it to defendant LANDIS, who then sold to Person #1, in exchange for cash.

The July 21, 2009 Sale of Crack Cocaine

On or about July 21, 2009:

4. Defendant ALFREDO SIERRA LANDIS met Person #1 at 807 North Eighth Street in Allentown and agreed to sell Person #1 crack cocaine. At the direction of defendant LANDIS, defendants WILSON VIGO and MARIA VIGO retrieved two bags of crack cocaine to be sold to Person #1.

5. Meanwhile, defendant ALFREDO SIERRA LANDIS and Person # 2 known to the grand jury separately drove two vehicles, a Plymouth Neon with Pennsylvania Registration Number GJC-0418, and a Chrysler 300M with Pennsylvania Registration Number HGJ-8808, to a garage located at 739 Cedar Street in Allentown, and then returned to 807 North Eighth Street with additional crack cocaine to be sold to Person #1.

6. Once he returned to 807 North Eighth Street, defendant ALFREDO SIERRA LANDIS sold approximately 6.31 grams of crack cocaine to Person #1, in exchange for cash.

The July 23, 2009 Sale of Crack Cocaine

On or about July 23, 2009:

7. Defendant ALFREDO SIERRA LANDIS met Person #1 at 807 North Eighth Street in Allentown and agreed to sell Person #1 crack cocaine.

8. Defendant ALFREDO SIERRA LANDIS left 807 North Eighth Street and drove the Plymouth Neon vehicle, Pennsylvania Registration No. GJC-0418, to the garage at 739 Cedar Street where he retrieved crack cocaine.

9. Defendant ALFREDO SIERRA LANDIS then returned to 807 North Eighth Street, and at that location, sold approximately 9.5 grams of crack cocaine to Person #1, in exchange for cash.

The July 28, 2009 Sale of Crack Cocaine

On or about July 28, 2009:

10. Defendant ALFREDO SIERRA LANDIS met Person #1 at 807 North Eighth Street and agreed to sell Person #1 crack cocaine. Defendant LANDIS, using a razor provided by defendant EDWIN RODRIGUEZ, cut an amount of crack cocaine for sale to Person #1, and then sold Person #1 approximately 2.1 grams of crack cocaine, in exchange for cash.

The July 29, 2009 Sale of Crack Cocaine

11. On or about July 29, 2009, defendant ALFREDO SIERRA LANDIS sold approximately 10.4 grams of crack cocaine to Person #1 at 807 North Eighth Street, in exchange for cash.

The August 6, 2009 Sale of Crack Cocaine

12. On or about August 6, 2009, defendant ALFREDO SIERRA LANDIS sold approximately 4.8 grams of crack cocaine to Person #1 at 807 North Eighth Street, in exchange for cash.

The August 7, 2009 Relocation of Crack Cocaine and Marijuana

13. On or about August 7, 2009, defendants ALFREDO SIERRA LANDIS and EDWIN RODRIGUEZ used the Plymouth Neon vehicle, Pennsylvania Registration No. GJC-0418, to transport crack cocaine and marijuana from 807 North Eighth Street in Allentown to the garage located at 739 Cedar Street in Allentown, Pennsylvania.

The August 10, 2009 Sale of Crack Cocaine and Marijuana

On or about August 10, 2009:

14. Defendant ALFREDO SIERRA LANDIS met Person #1 at 807 North Eighth Street in Allentown and agreed to sell Person #1 crack cocaine.

15. At the direction of defendant ALFREDO SIERRA LANDIS, defendant EDWIN RODRIGUEZ drove to the garage, located at 739 Cedar Street in Allentown, and returned to 807 North Eighth Street with approximately 0.91 grams crack cocaine, which he gave to defendant ALFREDO SIERRA LANDIS. Defendant LANDIS then sold the crack cocaine to Person #1 at 807 North Eighth Street, in exchange for cash.

16. Defendant EDWIN RODRIGUEZ also sold approximately 1.7 grams of marijuana to Person #1 at 807 North Eighth Street, in exchange for cash.

The August 14, 2009 Sales of Crack Cocaine and Marijuana

On or about August 14, 2009, defendant ALFREDO SIERRA LANDIS participated in the following three sales of illegal controlled substances:

17. Defendant ALFREDO SIERRA LANDIS met Person #1 at 807 North Eighth Street in Allentown and sold Person #1 approximately 5.4 grams of crack cocaine, in exchange for cash.

18. A short time later the same day, Person #1 returned to 807 North Eighth Street and asked defendant ALFREDO SIERRA LANDIS for additional crack cocaine, as well as marijuana.

19. At the direction of defendant ALFREDO SIERRA LANDIS, defendant LAYANO SIERRA LANDIS retrieved crack cocaine from inside the house at 807 North Eighth

Street, cut up the crack cocaine, and provided approximately 0.36 grams of crack cocaine to defendant LANDIS. Defendant LANDIS then sold the crack cocaine to Person #1 at 807 North Eighth Street, in exchange for cash.

20. Meanwhile, Person # 2 known to the grand jury retrieved approximately 1.7 grams of marijuana from a shed, located in the back yard of 807 North Eighth Street, and provided it to defendant ALFREDO SIERRA LANDIS, who then sold the marijuana to Person #1, in exchange for cash.

The August 19, 2009 Sale of Crack Cocaine

21. On or about August 19, 2009, defendant ALFREDO SIERRA LANDIS sold approximately 5.6 grams of crack cocaine to Person #1 at 807 North Eighth Street in Allentown, in exchange for cash.

The August 28, 2009 Sale of Marijuana and Crack Cocaine

On or about August 28, 2009:

22. Defendant ALFREDO SIERRA LANDIS arranged to sell crack cocaine to Person #1. When Person #1 went to 807 North Eighth Street in Allentown to purchase crack cocaine from defendant LANDIS, LANDIS was not there.

23. Instead, at the same location, defendant EDWIN RODRIGUEZ sold Person #1 approximately 3.3 grams of marijuana, in exchange for cash.

24. A short time later, ALFREDO SIERRA LANDIS arrived at 807 North Eighth Street and, in the presence of defendant EDWIN RODRIGUEZ, sold Person #1 approximately 5.4 grams of crack cocaine, in exchange for cash.

The September 3, 2009 Sale of Powder Cocaine and Marijuana

On or about September 3, 2009:

25. Defendant ALFREDO SIERRA LANDIS met Person #1 at 807 North Eighth Street in Allentown, and agreed to sell Person #1 powder cocaine.

26. At the direction of defendant ALFREDO SIERRA LANDIS, defendant EDWIN RODRIGUEZ retrieved powder cocaine from the garage, located at 739 Cedar Street in Allentown, and then returned to 807 North Eighth Street and provided the powder cocaine to defendant LANDIS.

27. Defendant ALFREDO SIERRA LANDIS then sold approximately 0.90 grams of powder cocaine and approximately 1.2 grams of marijuana to Person #1 at 807 North Eighth Street, in exchange for cash. During the transaction, defendants LANDIS and EDWIN RODRIGUEZ both possessed shotguns.

The September 25, 2009 Sale of Crack Cocaine and Marijuana

28. On or about September 25, 2009, defendant ALFREDO SIERRA LANDIS sold approximately 0.86 grams of crack cocaine and approximately 0.46 grams of marijuana to Person #1 at 807 North Eighth Street, in exchange for cash.

The January 26, 2010 Sale of Crack Cocaine

On or about January 26, 2010:

29. Defendant ALFREDO SIERRA LANDIS agreed to sell Person #1 powder cocaine.

30. Later that same day, Person #1 went to 807 North Eighth Street in Allentown, and was met by a male unknown to the grand jury. This unknown individual

informed Person #1 that he had been sent by defendant ALFREDO SIERRA LANDIS, and he delivered approximately 1.9 grams of crack cocaine to Person #1, in exchange for cash.

The February 16, 2010 Sale of Crack Cocaine

On or about February 16, 2010:

31. Defendant ALFREDO SIERRA LANDIS agreed to sell Person #1 crack cocaine at 807 North Eighth Street in Allentown.

32. When Person #1 went to 807 North Eighth Street, Person #1 was met by defendant EDWIN RODRIGUEZ, who sold approximately 9.3 grams of crack cocaine to Person #1, in exchange for cash.

The February 19, 2010 Sale of Crack Cocaine

On or about February 19, 2010:

33. Defendant ALFREDO SIERRA LANDIS arranged to sell crack cocaine to Person #1 at 807 North Eighth Street.

34. Later that same day, Person #1 went to 807 North Eighth Street and was met there by defendant ALFREDO SIERRA LANDIS, who sold approximately 10.5 grams of crack cocaine to Person #1 in exchange for cash. During the transaction, defendant LAYANO SIERRA LANDIS stood next to defendant ALFREDO SIERRA LANDIS and brandished a handgun in the presence of Person #1.

The February 23, 2010 Sale of Crack Cocaine

35. On or about February 23, 2010, defendant ALFREDO SIERRA LANDIS sold approximately 3.2 grams of crack cocaine to Person #1 at 807 North Eighth Street in Allentown, in exchange for cash.

The February 25, 2010 Sale of Crack Cocaine and Marijuana

On or about February 25, 2010:

36. Defendant ALFREDO SIERRA LANDIS agreed to sell crack cocaine to Person #1 at 807 North Eighth Street.

37. Later that same day, Person #1 met defendant ALFREDO SIERRA LANDIS at 807 North Eighth Street and asked to buy marijuana in addition to crack cocaine. At the direction of defendant LANDIS, defendant EDWIN RODRIGUEZ subsequently retrieved crack cocaine and marijuana and gave it to defendant LANDIS, who sold approximately 12.8 grams of crack cocaine and approximately 1.2 grams of marijuana to Person #1, in exchange for cash.

The March 9, 2010 Sale of Crack Cocaine

On or about March 9, 2010:

38. Defendant ALFREDO SIERRA LANDIS agreed to sell crack cocaine to Person #1 at 807 North Eighth Street.

39. Later that same day, Person #1 went to 807 North Eighth Street and met defendant EDWIN RODRIGUEZ, who sold approximately 7.2 grams of crack cocaine to Person #1, in exchange for cash.

The March 17, 2010 Sale of Crack Cocaine

On or about March 17, 2010:

40. Defendant ALFREDO SIERRA LANDIS met Person #1 at 807 North Eighth Street in Allentown and agreed to sell Person #1 crack cocaine. At the direction of defendant LANDIS, defendant EDWIN RODRIGUEZ retrieved crack cocaine and provided it to

defendant LANDIS, who then sold approximately 3.6 grams of crack cocaine to Person #1, in exchange for cash.

Storage of Firearms at New Street Garage

On or about March 25, 2010:

41. In the presence of Person #1, defendant ALFREDO SIERRA LANDIS displayed firearms, including a machine gun and a handgun, and ammunition, that he stored inside the trunk of a Nissan Altima parked inside the garage, located in the 800 block of New Street in Allentown.

The March 26, 2010 Sale of Crack Cocaine

On or about March 26, 2010:

42. Defendant ALFREDO SIERRA LANDIS met Person #1 behind 807 North Eighth Street and agreed to sell Person #1 crack cocaine. At the direction of defendant LANDIS, defendant EDWIN RODRIGUEZ retrieved crack cocaine and provided it to defendant LANDIS, who then sold approximately 0.18 grams of crack cocaine to Person #1, in exchange for cash.

43. During the transaction, defendant ALFREDO SIERRA LANDIS stated that one of the firearms that he had previously shown to Person #1 at the garage on New Street was an “AK.”

The April 27, 2010 Sale of Crack Cocaine

On or about April 27, 2010:

44. Defendant ALFREDO SIERRA LANDIS agreed to sell crack cocaine to Person #1 at 807 North Eighth Street in Allentown.

45. When Person #1 went to 807 North Eighth Street, he met by defendant EDWIN RODRIGUEZ, who sold approximately 1.7 grams of crack cocaine to Person #1, in exchange for cash.

The April 28, 2010 Sale of Crack Cocaine

On or about April 28, 2010:

46. Defendant ALFREDO SIERRA LANDIS agreed to sell Person #1 crack cocaine at 807 North Eighth Street in Allentown. At the direction of defendant LANDIS, defendant EDWIN RODRIGUEZ retrieved crack cocaine and provided it to defendant LANDIS, who then sold approximately 5.6 grams of crack cocaine to Person #1, in exchange for cash.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 9, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
WILSON VIGO**

knowingly and intentionally distributed, and aided and abetted and willfully caused the
distribution 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)(C), and
Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 9, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
WILSON VIGO**

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 18, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
WILSON VIGO**

knowingly and intentionally distributed, and aided and abetted the distribution 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)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 18, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
WILSON VIGO**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2, and Title 18, United States Code, Section 2.

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 21, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”
WILSON VIGO, and
MARIA VIGO**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 6.31 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:

On or about July 21, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”
WILSON VIGO, and
MARIA VIGO**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 6.31 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

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

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 23, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed 5 grams or more, that is, approximately 9.5 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 NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 23, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed 5 grams or more, that is, approximately 9.5 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, 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).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 28, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution 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)(C), and Title 18, United States Code, Section 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 28, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

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

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 29, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed 5 grams or more, that is, approximately 10.4 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).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 29, 2009, in Allentown, in the Eastern District of Pennsylvania,
defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed 5 grams or more, that is, approximately 10.4 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, 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).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 6, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed 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)(C).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 6, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

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

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 10, 2009, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution 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)(C), and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 10, 2009, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

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

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 10, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed for remuneration a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

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

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 10, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed for remuneration a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

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

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

Transaction #1

On or about August 14, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed 5 grams or more, that is, approximately 5.4 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).

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

Transaction #1

On or about August 14, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse”**

knowingly and intentionally distributed 5 grams or more, that is, approximately 5.4 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, 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).

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

Transaction # 2

On or about August 14, 2009, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
LAYANO SIERRA LANDIS**

knowingly and intentionally distributed, and aided and abetted the distribution 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)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

Transaction # 2

On or about August 14, 2009, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
LAYANO SIERRA LANDIS**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

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

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

Transaction # 3

On or about August 14, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed, and aided and abetted the distribution for remuneration of, a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

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

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

Transaction # 3

On or about August 14, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed, and aided and abetted the distribution for remuneration of, a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

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

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 19, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed 5 grams or more, that is, approximately 5.6 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).

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 19, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed 5 grams or more, that is, approximately 5.6 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, 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).

COUNT TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 28, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**EDWIN RODRIGUEZ,
a/k/a “Fresh”**

knowingly and intentionally distributed for remuneration a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

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

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 28, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed for remuneration a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

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

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 28, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed 5 grams or more, that is, approximately 5.4 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).

COUNT THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 28, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed 5 grams or more, that is, approximately 5.4 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, 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).

COUNT THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 3, 2009, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution 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)(C), and Title 18, United States Code, Section 2.

COUNT THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 3, 2009, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

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

COUNT THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 3, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed for remuneration a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

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

COUNT THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 3, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed for remuneration a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

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

COUNT THIRTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 3, 2009, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly possessed, and aided and abetted the possession of, a firearm in furtherance of a drug trafficking crime for which they 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, and distribution of a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

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

COUNT THIRTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 25, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed for remuneration a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

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

COUNT THIRTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 25, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed for remuneration a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

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

COUNT THIRTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 25, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed 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)(C).

COUNT FORTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 25, 2009, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

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

COUNT FORTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 26, 2010, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution 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)(C), and Title 18, United States Code, Section 2.

COUNT FORTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 26, 2010, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

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

COUNT FORTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2010, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of, 5 grams or more, that is, approximately 9.3 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 FORTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2010, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of, 5 grams or more, that is, approximately 9.3 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

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

COUNT FORTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 19, 2010, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
LAYANO SIERRA LANDIS**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 10.5 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), and Title 18, United States Code, Section 2.

COUNT FORTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 19, 2010, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
LAYANO SIERRA LANDIS**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 10.5 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

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

COUNT FORTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 19, 2010, in Allentown, in the Eastern District of Pennsylvania, defendant

LAYANO SIERRA LANDIS

knowingly possessed a firearm 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, and distribution of a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

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

COUNT FORTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 23, 2010, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed 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)(C).

COUNT FORTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 23, 2010, in Allentown, in the Eastern District of Pennsylvania, defendant

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

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

COUNT FIFTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 25, 2010, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 12.8 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 FIFTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 25, 2010, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 12.8 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

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

COUNT FIFTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 25, 2010, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, for remuneration a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

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

COUNT FIFTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 25, 2010, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, for remuneration a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D), and Title 18, United States Code, Section 2.

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

COUNT FIFTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 9, 2010, in Allentown, in the Eastern District of Pennsylvania,
defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of, 5 grams or more, that is, approximately 7.2 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 FIFTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 9, 2010, in Allentown, in the Eastern District of Pennsylvania,
defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of, 5 grams or more, that is, approximately 7.2 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

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

COUNT FIFTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 17, 2010, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution 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)(C), and Title 18, United States Code, Section 2.

COUNT FIFTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 17, 2010, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

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

COUNT FIFTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 26, 2010, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution 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)(C), and Title 18, United States Code, Section 2.

COUNT FIFTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 26, 2010, in Allentown, in the Eastern District of Pennsylvania, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

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

COUNT SIXTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 27, 2010, in Allentown, in the Eastern District of Pennsylvania,
defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution 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)(C), and Title 18, United States Code, Section 2.

COUNT SIXTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 27, 2010, in Allentown, in the Eastern District of Pennsylvania,
defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

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

COUNT SIXTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 28, 2010, in Allentown, in the Eastern District of Pennsylvania,
defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 5.6 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 SIXTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 28, 2010, in Allentown, in the Eastern District of Pennsylvania,
defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,” and
EDWIN RODRIGUEZ,
a/k/a “Fresh,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 grams or more, that is, approximately 5.6 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Washington Elementary School, a public elementary school, located at 837 North Ninth Street in Allentown, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

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

COUNT SIXTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

From at least in or about July 2009, to in or about August 2009, in Allentown, in the Eastern District of Pennsylvania, defendants

**WILSON VIGO and
MARIA VIGO**

managed and controlled the residence located at 807 North Eighth Street in Allentown, Pennsylvania, as lessees, and knowingly and intentionally made available for use this residence for the purpose of unlawfully storing and distributing a controlled substance, that is, cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 856(a)(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), 846, and 860, set forth in this indictment, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”
EDWIN RODRIGUEZ,
a/k/a “Fresh,”
LAYANO SIERRA LANDIS,
WILSON VIGO, and
MARIA VIGO**

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,

(i) a Plymouth Neon with Pennsylvania Registration Number GJC-0418; and

(ii) a Chrysler 300M with Pennsylvania Registration Number HGJ-8808; 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 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 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 intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

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

3. As a result of the violations of Title 18, United States Code, Section 924(c), set forth in this indictment, defendants

**ALFREDO SIERRA LANDIS,
a/k/a “King Posse,”
EDWIN RODRIGUEZ,
a/k/a “Fresh,” and
LAYANO SIERRA LANDIS,**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of such offense, including, but not limited to:

- (a) a machine gun;
- (b) a handgun;
- (c) shotguns; and
- (c) ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,
United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney