

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
CHRISTIAN SERRANO, a/k/a "Wassa,"	:	VIOLATIONS:
EDWIN MEDINA, JR., a/k/a "June,"	:	21 U.S.C. § 846 (conspiracy to distribute 1 kilogram or more of heroin - 1 count)
DAVID GARCIA, a/k/a "Mike,"	:	21 U.S.C. § 841(a)(1) (possession with intent to distribute 100 grams or more of heroin - 2 counts)
DANIEL CRUZ-RIVERA, a/k/a "Joel,"	:	21 U.S.C. § 841(a)(1) (distribution of heroin - 2 counts)
RIGERBERTO CAMPUSANO, a/k/a "Driver"	:	21 U.S.C. § 843(b) (unlawful use of a communication facility - 16 counts)
	:	18 U.S.C. § 924 (c) (possession of a firearm in furtherance of drug trafficking - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notices of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about June 2008, to on or about July 21, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**CHRISTIAN SERRANO,
a/k/a "Wassa,"
EDWIN MEDINA, JR.,
a/k/a "June,"
DAVID GARCIA,
a/k/a "Mike,"
DANIEL CRUZ-RIVERA,
a/k/a "Joel," and
RIGERBERTO CAMPUSANO,
a/k/a "Driver,"**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 1 kilogram or more 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)(A).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant **CHRISTIAN SERRANO** sold and distributed pre-packaged, branded heroin in bundle quantities for a 10-block square area of street corners in Philadelphia, Pennsylvania, bounded by Clearfield Street on the north, Kensington Avenue on the east, Somerset Street on the south, and Front Street on the west and, to other heroin distributors, including defendant **EDWIN MEDINA, JR.**, at prices ranging from \$60 to \$70 per bundle, with each bundle containing 10-15 glassine packets of branded heroin.
3. Defendant **CHRISTIAN SERRANO** purchased heroin in ½ kilogram to 1 kilogram amounts on a bi-weekly basis from sources of supply in Philadelphia, Pennsylvania and elsewhere, and supplied the heroin to defendant **DANIEL LUIS CRUZ-RIVERA** for cutting, bagging and branding.
4. Defendant **CHRISTIAN SERRANO** hired defendant **DANIEL LUIS CRUZ-RIVERA** to organize and operate a heroin bagging operation for the SERRANO DTO, which at times was located in the basement of a residence at 515 East Westmoreland Street in Philadelphia, Pennsylvania.
5. At the direction of defendant **CHRISTIAN SERRANO**, defendant **DANIEL LUIS CRUZ-RIVERA**, used Xylazine, a horse tranquilizer, supplied by defendant

SERRANO, as a substance to “cut,” and as an additive to, the heroin in order to achieve an increase in the intoxicating effect of the heroin on heroin users who would purchase the heroin.

6. Defendant **DANIEL LUIS CRUZ-RIVERA** controlled the heroin bagging operation for the **SERRANO** DTO, working on a daily basis in eight-hour stretches to “cut,” prepare, brand and bag heroin, which was packaged in glassine packets bearing the brand names “Boost,” “Game Over,” “Drano Max,” “U2,” “On Fire” and “Nite Life.”

7. Defendant **RIGERBERTO CAMPUSANO, a/k/a “Driver,”** was a member of the Serrano DTO, who was directed by defendants **SERRANO** and **CRUZ-RIVERA**, to deliver the pre-packaged, branded heroin produced by the **SERRANO** DTO to various locations where the heroin was stored or distributed, and also to collect cash payments for the bundled and branded heroin sold by the DTO. Defendant **CAMPUSANO** was responsible for safeguarding and delivering cash proceeds of the heroin distribution operation obtained from the controllers and operators of various heroin distribution locations, including defendant **EDWIN MEDINA, JR.**, to defendants **SERRANO** and **CRUZ-RIVERA**.

8. Defendant **EDWIN MEDINA, JR., a/k/a “June,”** was the owner and controller of a heroin distribution corner located at Swanson and Somerset Streets, in Philadelphia, Pennsylvania, who on a daily basis, through the assistance of co-defendant **DAVID GARCIA, a/k/a “Mike,”** kept the corner supplied with pre-packaged “Nite Life” brand heroin obtained from members of the Serrano DTO, and paid “caseworkers” to carry out the sale and distribution of the pre-packaged heroin in bundled form to heroin customers on the street.

9. Defendant **CHRISTIAN SERRANO** sold and distributed and caused the sale and distribution of the Serrano DTO’s pre-packaged, branded heroin in bundle quantities in

amounts ranging from 50 to 100 bundles per selling location per day. Defendant **SERRANO** had the capability to produce for sale and distribution approximately seven hundred (700) to one thousand (1,000) bundles of pre-packaged heroin on a daily basis.

10. Defendants **CHRISTIAN SERRANO, EDWIN MEDINA, JR., DAVID GARCIA, DANIEL CRUZ-RIVERA, and RIGERBERTO CAMPUSANO** at various times, acquired, possessed, carried, stored and used firearms, including semi-automatic pistols and an assault rifle, to protect their drug operations, their residences, themselves and the substantial cash proceeds generated by the drug trafficking organizations' daily operations.

11. Defendants **CHRISTIAN SERRANO, EDWIN MEDINA, JR., DAVID GARCIA, DANIEL CRUZ-RIVERA, and RIGERBERTO CAMPUSANO** frequently used cellular telephones to communicate with one another to coordinate, arrange and carry out the drug trafficking organizations' daily operations, including the conduct of the heroin packaging operation, the delivery of bundled, branded heroin to heroin customers, the collection and safeguarding of proceeds of the organizations' operations, and the monitoring of law enforcement activity in the areas where the organizations operated; the defendants regularly replaced their personal cellular telephones in order to attempt to thwart detection of their drug trafficking activities by law enforcement.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 11 of Count One of this indictment are incorporated here.

2. On or about March 2, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CHRISTIAN SERRANO,
a/k/a "Wassa,"**

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 11 of Count One of this indictment are incorporated here.

2. On or about March 23, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CHRISTIAN SERRANO,
a/k/a "Wassa,"**

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 23, 2011, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CHRISTIAN SERRANO,
a/k/a "Wassa,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 26, 2011, at approximately 10:08 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendants

**CHRISTIAN SERRANO,
a/k/a "Wassa," and
EDWIN MEDINA,
a/k/a "June,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 3, 2011, at approximately 12:29 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendants

**CHRISTIAN SERRANO,
a/k/a "Wassa," and
DANIEL LUIS CRUZ-RIVERA,
a/k/a "Joel,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 3, 2011, at approximately 6:56 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendants

**CHRISTIAN SERRANO,
a/k/a "Wassa," and
DANIEL LUIS CRUZ-RIVERA,
a/k/a "Joel,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 20, 2011, at approximately 4:20 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendants

**EDWIN MEDINA,
a/k/a "June," and
DAVID GARCIA,
a/k/a "Mike,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 21, 2011, at approximately 3:04 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendants

**DANIEL LUIS CRUZ-RIVERA,
a/k/a "Joel," and
RIGERBERTO CAMPUSANO,
a/k/a "Driver,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 22, 2011, at approximately 4:24 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendant

**CHRISTIAN SERRANO,
a/k/a "Wassa,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 22, 2011, at approximately 10:18 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendant

**EDWIN MEDINA,
a/k/a "June," and
DAVID GARCIA, a/k/a "Mike,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 27, 2011, at approximately 12:49 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendant

**CHRISTIAN SERRANO,
a/k/a "Wassa,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 28, 2011, at approximately 9:01 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendants

**CHRISTIAN SERRANO,
a/k/a "Wassa,"
DANIEL LUIS CRUZ-RIVERA,
a/k/a "Joel,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 29, 2011, at approximately 1:57 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendants

**DANIEL LUIS CRUZ-RIVERA,
a/k/a "Joel," and
DAVID GARCIA,
a/k/a "Mike,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 29, 2011, at approximately 2:44 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendants

**DANIEL LUIS CRUZ-RIVERA,
a/k/a "Joel," and
DAVID GARCIA,
a/k/a "Mike,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 20, 2011, at approximately 4:20 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendants

**CHRISTIAN SERRANO,
a/k/a "Wassa," and
DANIEL LUIS CRUZ-RIVERA,
a/k/a "Joel,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 20, 2011, at approximately 10:46 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendants

**CHRISTIAN SERRANO,
a/k/a "Wassa," and
RIGERBERTO CAMPUSANO,
a/k/a "Driver,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 20, 2011, at approximately 10:49 p.m., in the Eastern District of Pennsylvania, and elsewhere, defendants

**CHRISTIAN SERRANO,
a/k/a "Wassa," and
EDWIN MEDINA, JR.,
a/k/a "June,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 21, 2011, at approximately 10:51 a.m., in the Eastern District of Pennsylvania, and elsewhere, defendants

**EDWIN MEDINA, JR.,
a/k/a "June," and
DAVID GARCIA,
a/k/a "Mike,"**

knowingly and intentionally used a communication facility, that is, a telephone, in committing and in causing and facilitating a felony, that is, conspiracy to distribute and possess with intent to distribute 1 kilogram or more 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 843(b).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 11 of Count One of this indictment are incorporated here.
2. On or about July 21, 2011, at 515 E. Westmoreland Street, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**CHRISTIAN SERRANO,
a/k/a "Wassa," and
DANIEL LUIS CRUZ-RIVERA,
a/k/a "Joel,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted and caused the possession with intent to distribute of, 100 grams or more, that is, approximately 868 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 TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 11 of Count One of this indictment are incorporated here.
2. On or about July 21, 2011, at 6451 Oxford Avenue, Apartment #C-105, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**CHRISTIAN SERRANO,
a/k/a "Wassa,"
DANIEL LUIS CRUZ-RIVERA,
a/k/a "Joel," and
RIGERBERTO CAMPUSANO,
a/k/a "Driver,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted and caused the possession with intent to distribute of, 100 grams or more, that is, approximately 172 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 TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

From on or about May 26, 2011 to on or about July 21, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**CHRISTIAN SERRANO,
a/k/a "Wassa,"
EDWIN MEDINA, JR.,
a/k/a "June,"
DAVID GARCIA,
a/k/a "Mike,"
DANIEL CRUZ-RIVERA,
a/k/a "Joel," and
RIGERBERTO CAMPUSANO,
a/k/a "Driver,"**

knowingly possessed, and aided and abetted the possession of, a firearm, that is: (1) one Taurus Millennium, Model PT140, .40 caliber semi-automatic pistol with empty magazine, serial number SAV24350; (2) one Smith/Wesson, Model MP9, 9mm semi-automatic pistol with loaded magazine, serial number DSJ9732; (3) one Diamondback Arms, Model DB 380, .380 caliber semi-automatic pistol with loaded magazine, serial number partially obliterated and unreadable; (4) one Bersa Thunder .380 caliber semi-automatic pistol with loaded magazine, serial number 548294; (5) one Glock 23, .40 caliber semi-automatic pistol with loaded magazine, serial number KHZ118, together with a 29 round extended magazine for the weapon; (6) one Taurus, 9mm semi-automatic pistol, serial number TD087480, together with a fully loaded magazine in the handgun; and (7) one Monico, Model MAK-90, 7.62 assault rifle, with empty magazine together with multiple live rounds, serial number 94141992, 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 heroin, in violation of Title 21, United States Code, Section 846.

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

NOTICE OF FORFEITURE

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

**CHRISTIAN SERRANO,
a/k/a "Wassa,"
EDWIN MEDINA, JR.,
a/k/a "June,"
DAVID GARCIA,
a/k/a "Mike,"
DANIEL CRUZ-RIVERA,
a/k/a "Joel," and
RIGERBERTO CAMPUSANO,
a/k/a "Driver,"**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of such offenses, that is:

1. one Taurus Millennium, Model PT140, .40 caliber semi-automatic pistol with empty magazine, serial number SAV24350;
2. one Smith/Wesson, Model MP9, 9mm semi-automatic pistol with loaded magazine, serial number DSJ9732;
3. one Diamondback Arms, Model DB 380, .380 caliber semi-automatic pistol with loaded magazine, serial number partially obliterated and unreadable;
4. one Bersa Thunder .380 caliber semi-automatic pistol with loaded magazine, serial number 548294;
5. one Glock 23, .40 caliber semi-automatic pistol with loaded magazine, serial number KHZ118, together with a 29 round extended magazine for the weapon;
6. one Taurus, 9mm semi-automatic pistol, serial number TD087480, together with a fully loaded magazine in the handgun; and

7. one Monico, Model MAK-90, 7.62 assault rifle, with empty magazine together with multiple live rounds, serial number 94141992.

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

NOTICE OF FORFEITURE

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

**CHRISTIAN SERRANO,
a/k/a "Wassa,"
EDWIN MEDINA, JR.,
a/k/a "June,"
DAVID GARCIA,
a/k/a "Mike,"
DANIEL CRUZ-RIVERA,
a/k/a "Joel," and
RIGERBERTO CAMPUSANO,
a/k/a "Driver,"**

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 violations, including, but not limited to, the premises located at 2931 N. Hurley Street, Philadelphia, Pennsylvania, 2913 Hurley Street, Philadelphia, Pennsylvania, 2930 Boudinot Street, Philadelphia, Pennsylvania, 2952 Hurley Street, Philadelphia, Pennsylvania, 1113 McKinley Street, Philadelphia, Pennsylvania, 26 Rutgers Drive, Delran, New Jersey, 2264 E. Monmouth Street, Philadelphia, Pennsylvania, 3746 N. 7th Street, Philadelphia, Pennsylvania, 3273 Joyce Street, Philadelphia, Pennsylvania, 538 E. Indiana Street, Philadelphia, Pennsylvania, 2914 N. D Street, Philadelphia, Pennsylvania; and

(b) Any property constituting, or derived from, any proceeds obtained directly or indirectly as a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), as charged in this indictment, including the sums of \$55,970 seized from the residence of defendant EDWIN MEDINA, JR., \$53,638, seized from the residence of defendant CHRISTIAN SERRANO, \$8,982 seized from the residence of defendant DAVID GARCIA and

\$5,130 seized from the residence of defendant RIGERBERTO CAMPUSANO, representing proceeds obtained from the commission of such violations.

2. If any of the property described above as being subject to forfeiture, as a result of any act of omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other 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



ZANE DAVID MEMEGER
United States Attorney