

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
GERMAN ZAMBRANO -MADRIGAL,	:	VIOLATIONS:
 a/k/a “Baltazar Jimenez-	:	21 U.S.C. § 841(a)(1) (distribution of
 Murillo,”	:	heroin - 2 counts)
JESSE RIVERA	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute one kilogram or
	:	more of heroin - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about April 22, 2010, in Shillington, in the Eastern District of Pennsylvania, and elsewhere, defendants

**GERMAN ZAMBRANO-MADRIGAL,
a/k/a “Baltazar Jimenez-Murillo,” and
JESSE RIVERA**

knowingly and intentionally distributed, and aided and abetted 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 TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 26, 2010, in Shillington, in the Eastern District of Pennsylvania, and elsewhere, defendants

**GERMAN ZAMBRANO-MADRIGAL,
a/k/a “Baltazar Jimenez-Murillo,” and
JESSE RIVERA**

knowingly and intentionally distributed, and aided and abetted 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:

On or about April 26, 2010, in Shillington, in the Eastern District of Pennsylvania, and elsewhere, defendants

**GERMAN ZAMBRANO-MADRIGAL,
a/k/a “Baltazar Jimenez-Murillo,” and
JESSE RIVERA**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, one kilogram or more, that is, approximately 1,400 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)(A), and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

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

**GERMAN ZAMBRANO-MADRIGAL,
a/k/a “Baltazar Jimenez-Murillo,” and
JESSE RIVERA**

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 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 defendants up to the value of the property subject to forfeiture.

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

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney