

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
WILLIAM DELORBE ALVAREZ, a/k/a William Alvarez Delorbe, a/k/a Israel Maldonado, a/k/a Julio Felix Silvestre, a/k/a Mario Acosta	: : : :	VIOLATIONS: 18 U.S.C. § 1951 (attempted robbery which interferes with interstate commerce – 1 count) 18 U.S.C. § 924(c) (possession of a firearm in furtherance of a crime of violence – 1 count) 18 U.S.C. § 2 (aiding and abetting)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. The illegal distribution, possession with intent to distribute, importation, manufacture, possession, and use of illegal narcotics and controlled substances affects interstate and foreign commerce as follows:

- a. It has a substantial and detrimental effect on the health and general welfare of the American people;
- b. A major portion of the traffic in illegal narcotics and controlled substances flows through interstate and foreign commerce. Incidents of the traffic which are not an integral part of the interstate or foreign flow, such as manufacture, local distribution, and possession, nonetheless have a substantial and direct effect upon interstate commerce because many illegal narcotics and controlled substances: (i) after manufacture, these substances are transported in interstate commerce; (ii) such substances that are distributed locally usually have

been transported in interstate commerce immediately before their distribution; and (iii) immediately prior to the possession of such substances, they commonly flow through interstate commerce.

c. Local distribution and possession of illegal narcotics and controlled substances contribute to swelling the interstate traffic in such substances.

d. Illegal narcotics and controlled substances manufactured and distributed intrastate cannot be differentiated from controlled substances manufactured and distributed interstate.

All as set forth in Title 21, United States Code, Section 801.

2. In or about July 2002, in the Southern District of New York and elsewhere, defendant

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a/k/a Julio Felix Silvestre,
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and others known and unknown to the United States Attorney, obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant DELORBE ALVAREZ unlawfully attempted to take and obtain, and aided and abetted the unlawful attempted taking and obtaining of, drugs and drug proceeds from the person or in the presence of another and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their person and property in their possession, that is, defendant DELORBE ALVAREZ supplied information to members of the Manzueta robbery organization, knowing that members of that organization would use that

information to follow members of the William drug organization to take by force cocaine and proceeds from the distribution of cocaine.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

In or about July 2002, in the Southern District of New York and elsewhere,
defendant

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knowingly possessed, and aided and abetted the possession, of a firearm in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is, attempted robbery which interferes with interstate commerce in violation of Title 18, United States Code, Section 1951(a), as charged in Count One of this Information.

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

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**