

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
JUAN CARLOS FERMIN-MOREL : **VIOLATIONS:**
MODESTO MORILLO, : **21 U.S.C. § 846 (attempted**
a/k/a “Victor” : **possession of 5 kilograms or more**
: **of cocaine with intent to**
: **distribute - 1 count)**
: **18 U.S.C. § 2 (aiding and abetting)**
: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From on or about February 11, 2012, to on or about March 7, 2012, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JUAN CARLOS FERMIN-MOREL and
MODESTO MORILLO,
a/k/a “Victor,”**

knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the attempted possession with intent to distribute of, 5 kilograms or more, that is, approximately 5 kilograms, of a mixture or 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)(A).

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

1. As a result of the violation of Title 21, United States Code, Section 846, set forth in this indictment, defendants

**JUAN CARLOS FERMIN-MOREL and
MODESTO MORILLO,
a/k/a “Victor,”**

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 offense, including, but not limited to, \$65,120 in United States currency; and

(b) Any property constituting, or derived from, any proceeds obtained directly or indirectly from the commission of such offense, including the sum of \$65,120.

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;

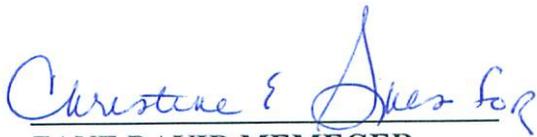
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable

property.

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

A TRUE BILL:

FOREPERSON


ZANE DAVID MEMEGER
United States Attorney