

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
ARNALDO RODRIGUEZ	:	VIOLATIONS:
FERNANDO GARCIA	:	21 U.S.C. § 846 (conspiracy to distribute
ALFONSO VALLEJO-GARCIA	:	5 kilograms or more of cocaine - 1 count)
JHON TORRES	:	21 U.S.C. § 841(a)(1) (possession with
JAIRO NUNEZ-DEJESUS	:	intent to distribute 5 kilograms or more
ANTONIO FERREIRA-REYES	:	of cocaine - 1 count)
	:	18 U.S.C. § 924(c) (possession of a firearm
	:	in furtherance of a drug trafficking crime
	:	- 1 count)
	:	18 U.S.C. § 2 (aiding & abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about January 29, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ARNALDO RODRIGUEZ,
FERNANDO GARCIA,
ALFONSO VALLEJO-GARCIA,
JHON TORRES,
JAIRO NUNEZ-DEJESUS,
and
ANTONIO FERREIRA-REYES**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 5 kilograms or more, that is, approximately 19 kilograms, 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)(A).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant ARNALDO RODRIGUEZ arranged for defendant ALFONSO VALLEJO-GARCIA to deliver a bulk shipment of cocaine from Mexico to Bensalem, in the Eastern District of Pennsylvania.

3. Defendant ARNALDO RODRIGUEZ arranged for defendant FERNANDO GARCIA to provide access to a warehouse located in Bensalem in order to allow defendants RODRIGUEZ, ALFONSO VALLEJO-GARCIA, JHON TORRES, JAIRO NUNEZ-DEJESUS, ANTONIO FERREIRA-REYES, and others known and unknown to the grand jury to off-load the shipment of cocaine.

4. Defendant ARNALDO RODRIGUEZ paid defendant FERNANDO GARCIA for providing access to the warehouse.

5. Defendants ARNALDO RODRIGUEZ, FERNANDO GARCIA, ALFONSO VALLEJO-GARCIA, JHON TORRES, JAIRO NUNEZ-DEJESUS, ANTONIO FERREIRA-REYES, and others known and unknown to the grand jury transferred the shipment of cocaine from a tractor-trailer to another vehicle driven by defendant TORRES.

6. Defendants ARNALDO RODRIGUEZ, FERNANDO GARCIA, ALFONSO VALLEJO-GARCIA, JHON TORRES, JAIRO NUNEZ-DEJESUS, ANTONIO FERREIRA-REYES, and others known and unknown to the grand jury transferred a large amount of currency into the tractor-trailer.

7. Defendant JAIRO NUNEZ-DEJESUS possessed a firearm to protect the cocaine.

8. Defendants ARNALDO RODRIGUEZ, FERNANDO GARCIA, ALFONSO VALLEJO-GARCIA, JHON TORRES, JAIRO NUNEZ-DEJESUS, ANTONIO FERREIRA-REYES, and others known and unknown to the grand jury received and transferred the shipment of cocaine with the intent to distribute it.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants ARNALDO RODRIGUEZ, FERNANDO GARCIA, ALFONSO VALLEJO-GARCIA, JHON TORRES, JAIRO NUNEZ-DEJESUS, ANTONIO FERREIRA-REYES, and others known and unknown to the grand jury committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. Defendant ARNALDO RODRIGUEZ asked defendant FERNANDO GARCIA to provide after-hours access to a warehouse located at 798 Haunted Lane, in Bensalem, Pennsylvania. The warehouse was owned by Interstate Glass Company, where defendant GARCIA was an employee.

2. Defendant ARNALDO RODRIGUEZ explained to defendant FERNANDO GARCIA that he wanted to use the warehouse to off-load bulk shipments of cocaine, and that he would pay defendant GARCIA for access to the warehouse.

On or about January 29, 2012:

3. At approximately 4:00 pm, defendant FERNANDO GARCIA entered the warehouse owned by Interstate Glass Company.

4. At approximately 4:20 pm, defendant ARNALDO RODRIGUEZ arrived at the warehouse, driving a green 1999 Honda Accord. Defendant RODRIGUEZ entered the

warehouse, where he met with defendant FERNANDO GARCIA.

5. At approximately 4:44 pm, two Jeep Cherokee SUVs drove to the rear area of the warehouse, and then entered the warehouse.

6. Defendants ARNALDO RODRIGUEZ and FERNANDO GARCIA stood just inside of the warehouse loading dock area, and repeatedly looked out from the loading dock doors.

7. At approximately 5:30 pm, defendant ALFONSO VALLEJO-GARCIA arrived at the warehouse loading dock. Defendant VALLEJO-GARCIA was driving a white 2004 International tractor (truck), which towed a 1998 Waba trailer. Both the tractor and trailer had Texas license plates.

8. Defendants ARNALDO RODRIGUEZ, FERNANDO GARCIA, ALFONSO VALLEJO-GARCIA, JHON TORRES, JAIRO NUNEZ-DEJESUS, ANTONIO FERREIRA-REYES, and others known and unknown to the grand jury off-loaded 19 brick-like packages of cocaine from the tractor-trailer. The total weight of the cocaine was approximately 19 kilograms. The cocaine was originally stored in a hidden compartment behind the front wall of the trailer.

9. Defendants ARNALDO RODRIGUEZ, FERNANDO GARCIA, ALFONSO VALLEJO-GARCIA, JHON TORRES, JAIRO NUNEZ-DEJESUS, ANTONIO FERREIRA-REYES, and others known and unknown to the grand jury placed the cocaine in a hidden compartment inside of a gold 2006 Jeep Cherokee.

10. Defendants ARNALDO RODRIGUEZ, FERNANDO GARCIA, ALFONSO VALLEJO-GARCIA, JHON TORRES, JAIRO NUNEZ-DEJESUS, ANTONIO

FERREIRA-REYES, and others known and unknown to the grand jury transferred 39 brick-like packages of currency, totaling approximately \$829,951, to the tractor-trailer. The currency was secreted inside of the hidden compartment in the trailer.

11. Defendant ARNALDO RODRIGUEZ paid defendant FERNANDO GARCIA approximately \$4000 while they were inside of the trailer.

12. Defendant JAIRO NUNEZ-DEJESUS possessed a Smith and Wesson, 9mm pistol, model SW9VE, with serial number DTD3107, loaded with 15 live rounds.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 29, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ARNALDO RODRIGUEZ,
FERNANDO GARCIA,
ALFONSO VALLEJO-GARCIA,
JHON TORRES,
JAIRO NUNEZ-DEJESUS,
and
ANTONIO FERREIRA-REYES**

knowingly and intentionally possessed with the intent to distribute, and aided and abetted the possession with the intent to distribute of, 5 kilograms or more, that is, approximately 19 kilograms, 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)(A), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 8, and Overt Acts 1 through 12 of Count One of this indictment are incorporated here.

2. On or about January 29, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JAIRO NUNEZ-DEJESUS

knowingly possessed a firearm, that is, a Smith and Wesson, 9mm pistol, model SW9VE, with serial number DTD3107, loaded with 15 live rounds, 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 cocaine, in violation of Title 21, United States Code, Section 846; and possession with the intent to distribute cocaine, a Schedule II 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).

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) and 846, as set forth in this indictment, defendants

**ARNALDO RODRIGUEZ,
FERNANDO GARCIA,
ALFONSO VALLEJO-GARCIA,
JHON TORRES,
JAIRO NUNEZ-DEJESUS,
and
ANTONIO FERREIRA-REYES**

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:
1. a 2006 Gold Jeep Grand Cherokee, with Pennsylvania license plate HVD-1090 and VIN 1J4GR48K26C111281;
 2. a white 2004 International Tractor (Truck) Model 9400i, with Texas license plate RK9-C32 and VIN 3HSCNASR24N021727; and a white 1998 Waba trailer, with Texas license plate X87-913 and VIN 1JJV532W4WL521392;
 3. a green 1999 Honda Accord, with Pennsylvania license plate HRK-9236 and VIN 1HGCG2241XA000695;
 4. a 2009 Volkswagon Passat, with Pennsylvania license plate HMP-8209 and VIN WVWJK73C29P048598; and,
- B. any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

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.

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

JAIRO NUNEZ-DEJESUS

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 Smith and Wesson, 9mm pistol, model SW9VE, with serial number DTD3107, loaded with 15 live rounds.

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

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney