

FILED
SEP 10 2020
CLERK, U. S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:20 cr 270 T35 TGW

21 U.S.C. § 846

21 U.S.C. § 841

18 U.S.C. § 924

DIEGO PEREZ ORTIZ,
RAMON ALERS RAMOS,
CARLOS ACOSTA MARTINEZ,
ANDRES GARCIA QUINONES,
IZMAHOMY VALVERDI CARABALLO,
EDWIN RIVERA FONSECA,
ANTONIO RIVERA,
KRIS RALF SALVI, and
ELLERIC EDUARDO ALVERIO

SEALED

INDICTMENT

The Grand Jury charges:

COUNT ONE

SEALED

Beginning on an unknown date, but not later than in or around
November 2019 and continuing through on or about the date of this
indictment, in the Middle District of Florida, and elsewhere, the defendants,

DIEGO PEREZ ORTIZ,
RAMON ALERS RAMOS,
CARLOS ACOSTA MARTINEZ,
ANDRES GARCIA QUINONES,
IZMAHOMY VALVERDI CARABALLO,

1

EDWIN RIVERA FONSECA,
ANTONIO RIVERA,
KRIS RALF SALVI, and
ELLERIC EDUARDO ALVERIO

did knowingly and willfully conspire and agree with each other and other persons, both known and unknown to the Grand Jury to distribute and possess with intent to distribute a controlled substance.

With respect to DIEGO PEREZ ORTIZ, and RAMON ALERS RAMOS, the violation involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance and 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), a Schedule II controlled substance.

With respect to CARLOS ACOSTA MARTINEZ, the violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance and 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), a Schedule II controlled substance.

With respect to ANDRES GARCIA QUINONES and IZMAHONY VALVERDI CARABALLO, EDWIN RIVERA FONSECA, the violation

involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

With respect to ANTONIO RIVERA, the violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

With respect to KRIS RALF SALVI and ELLERIC EDUARDO ALVERIO, the violation involved a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), a Schedule II controlled substance.

All in violation of 21 U.S.C. §§ 846 and 841(b)(1)(A), (b)(1)(B) and (b)(1)(C).

COUNT TWO

On or about October 2, 2019, in the Middle District of Florida, the defendant,

DIEGO PEREZ ORTIZ,

did knowingly and intentionally distribute a controlled substance. The violation involved a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C).

COUNT THREE

On or about November 20, 2019, in the Middle District of Florida, the defendant,

DIEGO PEREZ ORTIZ,

did knowingly and intentionally distribute a controlled substance. The violation involved a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

On or about January 30, 2020, in the Middle District of Florida, the defendant,

DIEGO PEREZ ORTIZ,

did knowingly and intentionally distribute a controlled substance. The violation involved a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

On or about March 20, 2020, in the Middle District of Florida, the defendants,

DIEGO PEREZ ORTIZ
EDWIN RIVERA FONSECA, and
ANTONIO RIVERA,

aiding and abetting each other, did knowingly and intentionally possess with intent to distribute a controlled substance.

With respect to DIEGO PEREZ ORTIZ, EDWIN RIVERA FONSECA and ANTONIO RIVERA, the violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B), and 18 U.S.C. § 2.

COUNT SIX

On or about March 20, 2020, in the Middle District of Florida, the defendant,

ANTONIO RIVERA,

did knowingly possess a firearm in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a Court of the United States, specifically, possession of a controlled substance with the intent to distribute as

alleged in Count Five above; Count Five being incorporated by reference.

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

COUNT SEVEN

On or about May 1, 2020, in the Middle District of Florida, the
defendant,

DIEGO PEREZ ORTIZ,

did knowingly and intentionally distribute a controlled substance. The violation involved a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

On or about May 8, 2020, in the Middle District of Florida, the
defendant,

EDWIN RIVERA FONSECA,

did knowingly and intentionally possess with intent to distribute a controlled substance. The violation involved a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C).

COUNT NINE

On or about June 10, 2020, in the Middle District of Florida, the defendant,

DIEGO PEREZ ORTIZ and
ELLERIC EDUARDO ALVERIO

aiding and abetting each other, did knowingly and intentionally possess with intent to distribute a controlled substance.

With respect to DIEGO PEREZ ORTIZ, and ELLERIC EDUARDO ALVERIO, the violation involved a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide (Fentanyl), a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C).

FORFEITURE

1. The allegations contained in Counts One through Nine, are incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 924(d), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 21 U.S.C. §§ 846 and/or 841, the defendants,

DIEGO PEREZ ORTIZ,
RAMON ALERS RAMOS,
CARLOS ACOSTA MARTINEZ,
ANDRES GARCIA QUINONES,
IZMAHOMY VALVERDI CARABALLO,

EDWIN RIVERA FONSECA,
ANTONIO RIVERA,
KRIS RALF SALVI, and
ELLERIC EDUARDO ALVERIO

shall forfeit to the United States, pursuant to 21 U.S.C. §§ 853(a)(1) and (2), any property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

3. Upon conviction of a violation of 18 U.S.C. § 924(c), the defendant,

ANTONIO RIVERA,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved or used in the violation.

4. The property to be forfeited includes, but is not limited to, the following: Taurus 9mm handgun and assorted ammunition.

5. If any of the property described above, as a result of any acts or omissions 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), directly and as incorporated by 28 U.S.C.

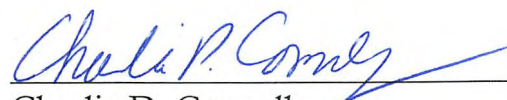
§ 2461(c).

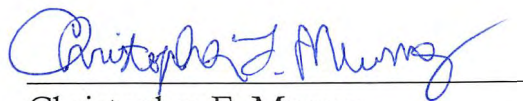
A TRUE BILL,



Foreperson

MARIA CHAPA LOPEZ
United States Attorney

By: 
Charlie D. Connally
Assistant United States Attorney

By: 
Christopher F. Murray
Assistant United States Attorney
Chief, Violent Crimes and Narcotics Section

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

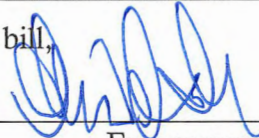
vs.

DIEGO PEREZ ORTIZ,
RAMON ALERS RAMOS,
CARLOS ACOSTA MARTINEZ,
ANDRES GARCIA QUINONES,
IZMAHONY VALVERDI CARABALLO,
EDWIN RIVERA FONSECA,
ANTONIO RIVERA,
KRIS RALF SALVI, and
ELLERIC EDUARDO ALVERIO

INDICTMENT

Violations: Title 21, United States Code, Section 846
Title 21, United States Code, Section 841
Title 18, United States Code, Section 924

A true bill,



Foreperson

Filed in open court this 10th day of September, 2020.

Clerk

Bail \$ _____
