

ALB:CPK  
F. #2018R02155

FILED  
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U.S. DISTRICT COURT, N.Y.

★ DEC 19 2018

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

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UNITED STATES OF AMERICA

INDICTMENT

- against -

**CR 18 678**  
Cr. No.

ALEXIS LAGUERRA,  
RAYMOND SOTO,  
also known as "Rambo," and  
RAYMOND SOTO,  
also known as "Razor,"

(T. 18, U.S.C., §§ 981(a)(1)(C),  
1512(k), 2113(b), 2 and 3551 et seq.;  
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,  
§ 2461(c))

Defendants.

**FEUERSTEIN, J.**

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**SHIELDS, M.J.**

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

1. The defendant ALEXIS LAGUERRA was a resident of Brooklyn, New York and an employee of Gardaworld ("Garda"), a corporation that operated armored cars carrying cash and other valuables from one location to another.
2. The defendant RAYMOND SOTO, also known as "Rambo," was a resident of Queens, New York.
3. The defendant RAYMOND SOTO, also known as "Razor," was a resident of Queens, New York. The defendant RAYMOND SOTO, also known as "Razor," was the father of the defendant RAYMOND SOTO, also known as "Rambo."

COUNT ONE  
(Bank Larceny)

4. On or about November 2, 2018, within the Eastern District of New York, the defendants ALEXIS LAGUERRA, RAYMOND SOTO, also known as “Rambo,” and RAYMOND SOTO, also known as “Razor,” together with others, did knowingly and intentionally take and carry away, with intent to steal and purloin, money exceeding \$1,000 belonging to and in the care, custody, control, management and possession of HSBC Bank USA, N.A., the deposits of which were insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Sections 2113(b), 2 and 3551 et seq.)

COUNT TWO  
(Conspiracy to Obstruct Justice)

5. On or about November 2, 2018, within the Eastern District of New York, the defendants ALEXIS LAGUERRA and RAYMOND SOTO, also known as “Rambo,” together with others, did knowingly, intentionally and corruptly conspire to alter, destroy, mutilate and conceal a record, document and other object, to wit: an iPhone 5s and the records contained therein, with the intent to impair the object’s integrity and availability for use in an official proceeding, contrary to Title 18, United States Code, Section 1512(c)(1).

(Title 18, United States Code, Sections 1512(k) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT ONE

6. The United States hereby gives notice to the defendants charged in Count One that, upon their conviction of such offense, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit

any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of to such offense.

7. If any of the above-described forfeitable property, 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 forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

  
RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

ALEXIS LAGUERRA, RAYMOND SOTO, JR. AND RAYMOND  
SOTO, SR.,

Defendants.

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**INDICTMENT**

(T. 18, U.S.C., §§ 981(a)(1)(C), 1512(k), 2113(b), 2 and 3551 et seq.; T.  
21, U.S.C § 853(p); T. 28, U.S.C. § 2461(c))

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*A true bill.*

\_\_\_\_\_  
*Foreperson*

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*Filed in open court this* \_\_\_\_\_ *day,*

*of* \_\_\_\_\_ *A.D. 20* \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

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*Bail, \$* \_\_\_\_\_

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*Charles P. Kelly, Assistant U.S. Attorney (631) 715-7866*