UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA ORLANDO DIVISION

UNITED STATES OF AMERICA

v.

Case No. 6:22-cr-120-cem - DAB 21 U.S.C. § 846

Filed Under Seal:

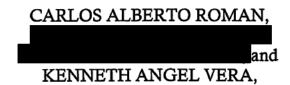


INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning on an unknown date, but not later than on or about March 21, 2021 and continuing through on or about August 3, 2022, in the Middle District of Florida, and elsewhere, the defendants,



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

With respect to Defendants ROMAN and the violation involved 40 grams or more of a mixture and substance containing a detectible amount of

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fentanyl, a schedule II controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1)(B).

With respect to Defendant the violation involved a mixture and substance containing a detectable amount of fentanyl and cocaine, both schedule II controlled substances, and is therefore punished under 21 U.S.C. § 841(b)(1)(C).

With respect to Defendant VERA, the violation involved a mixture and substance containing a detectable amount of cocaine, a schedule II controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1)(C).

All in violation of 21 U.S.C. §§ 841(a)(1), 846.

FORFEITURE

- 1. The allegations contained in Count One are incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 21 U.S.C. § 853.
- 2. Upon conviction of a violation of 21 U.S.C. § 846, the defendants 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. 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 shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).



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By:

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Assistant United States Attorney

By:

Michael P. Felicetta

Assistant United States Attorney

Chief, Orlando Division

UNITED STATES DISTRICT COURT

Middle District of Florida Orlando Division

THE UNITED STATES OF AMERICA

VS.

CARLOS ALBERTO ROMAN



INDICTMENT

Violations: 21 U.S.C. § 846

Filed in open court this 3rd day of August, 2022.

Clerk

Bail \$_____