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CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, P.R.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

[1] IVETTE CARABALLO PEREZ a.k.a.
"Tita," "Tita Perco"

[2] STEVEN VELAZQUEZ PEREZ

Defendants.

INDICTMENT

CRIMINAL NO. 17-409 (ADC)

Violations:

(COUNT ONE)

Title 21, United States Code, § 841(a)(1), and
846

(COUNT TWO)

Title 21, United States Code, § 841(a)(1) and
Title 18, United States Code, § 2

(COUNT THREE)

Title 21, United States Code, § 841(a)(1) and
Title 18, United States Code, § 2

(COUNT FOUR)

Title 21, United States Code, § 841(a)(1) Title
18, United States Code, § 2

(COUNT FIVE)

Title 21, United States Code, § 841(a)(1) Title
18, United States Code, § 2

Narcotics Forfeiture Allegation

Title 21, United States Code, § 853 and
Federal Rules of Criminal Procedure, Rule
32.2(a)

(FIVE COUNTS)

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Possess with Intent to Distribute a Controlled Substance)

Beginning on a date unknown, but no later than September 2016, and continuing up to
and until December 16, 2016 in the Municipality of Ponce and other areas nearby, in the District

of Puerto Rico, and elsewhere within the jurisdiction of this Court,

[1] IVETTE CARABALLO PEREZ a.k.a. "Tita"
[2] STEVEN VELAZQUEZ PEREZ

the defendants herein, did knowingly and intentionally, combine, conspire, and agree with each other and with diverse other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and intentionally possess with the intent to distribute a controlled substance, that is, detectable amounts of Oxycodone (commonly known as Percocet), a Schedule II Controlled Substance. All in violation of Title 21, United States Code Sections 841(a)(1) and 846.

COUNT TWO

(Aiding and Abetting in the Possession with Intent to Distribute a Controlled Substance)

On or around September 6, 2016, in the Municipality of Ponce and other areas nearby, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

[1] IVETTE CARABALLO PEREZ a.k.a. "Tita"
[2] STEVEN VELAZQUEZ PEREZ

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute detectable amounts of Oxycodone (commonly known as Percocet), a Schedule II Controlled Substance. All in violation of Title 21, United States Code Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THREE

(Aiding and Abetting in the Possession with Intent to Distribute a Controlled Substance)

On or around September 15, 2016, in the Municipality of Ponce and other areas nearby, in

the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

[1] IVETTE CARABALLO PEREZ a.k.a. "Tita"
[2] STEVEN VELAZQUEZ PEREZ

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute detectable amounts of Oxycodone (commonly known as Percocet), a Schedule II Controlled Substance. All in violation of Title 21, United States Code Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FOUR

(Aiding and Abetting in the Possession with Intent to Distribute a Controlled Substance)

On or around October 3, 2016, in the Municipality of Ponce and other areas nearby, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

[1] IVETTE CARABALLO PEREZ a.k.a. "Tita"
[2] STEVEN VELAZQUEZ PEREZ

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute detectable amounts of Oxycodone (commonly known as Percocet), a Schedule II Controlled Substance. All in violation of Title 21, United States Code Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FIVE

(Aiding and Abetting in the Possession with Intent to Distribute a Controlled Substance)

On or around December 16, 2016, in the Municipality of Ponce and other areas nearby, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

[1] IVETTE CARABALLO PEREZ a.k.a. "Tita"
[2] STEVEN VELAZQUEZ PEREZ

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute detectable amounts of Oxycodone (commonly known as Percocet), a Schedule II Controlled Substance. All in violation of Title 21, United States Code Section 841(a)(1) and Title 18, United States Code, Section 2.

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Narcotics Forfeiture Allegation
(21 U.S.C. §§ 841, 846)

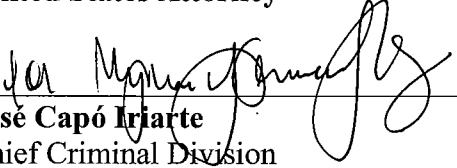
1. The allegations contained in Counts ONE through FIVE of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.
2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, the defendants, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:
 - a. A sum of money equal to the amount of proceeds obtained as a result of any of the offenses described in the instant Indictment.
3. If any of the property described above, 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).


21, United States Code, Section 853(p).

All in accordance with Title 21, United States Code, Section 853 and Rule 32.2(a) of the Federal Rules of Criminal Procedure.


ROSA EMILIA RODRIGUEZ-VELEZ
United States Attorney



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