

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

- (1) MICHAEL SPINOLA,
- (2) CURLY KELLY,
- (3) JESUS CASTILLO,
- (4) MARCOS ROSA,
- and
- (5) RUSSELL WATKINS,

Defendants

) Criminal No. 19-10279
)
) Violations:
)
) Count One: Conspiracy to Distribute and to
) Possess with Intent to Distribute Oxycodone
) (21 U.S.C. § 846)
)
) Count Two: Conspiracy to Distribute and to
) Possess with Intent to Distribute a Controlled
) Substance
) (21 U.S.C. § 846)
)
) Count Three: Conspiracy to Distribute and to
) Possess with Intent to Distribute Marijuana
) (21 U.S.C. § 846)
)
) Forfeiture Allegation:
) (21 U.S.C. § 853)

INDICTMENT

COUNT ONE

Conspiracy to Distribute and to Possess with Intent to Distribute
Oxycodone
(21 U.S.C. § 846)

The Grand Jury charges:

From in or about April 2018 through on or about June 23, 2018, in Boston, Cambridge,
Medford, and Somerville, in the District of Massachusetts, and elsewhere, the defendants,

- (1) MICHAEL SPINOLA,
- (2) CURLY KELLY,
- and
- (3) JESUS CASTILLO,

conspired with each other and with other persons known and unknown to the Grand Jury, to
knowingly and intentionally distribute and possess with intent to distribute oxycodone, a Schedule

SEALED

II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

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

COUNT TWO

Conspiracy to Distribute and to Possess with Intent to Distribute
A Controlled Substance (21 U.S.C. § 846)

The Grand Jury further charges:

From in or about April 2018 through in or about May 2018, in Southbridge and Boston,
in the District of Massachusetts, the District of Connecticut, and elsewhere, the defendants,

(1) MICHAEL SPINOLA,
(2) CURLY KELLY,
and
(4) MARCOS ROSA,

conspired with each other and with other persons known and unknown to the Grand Jury, to
knowingly and intentionally distribute and possess with intent to distribute a controlled substance,
in violation of Title 21, United States Code, Section 841(a)(1).

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

COUNT THREE

Conspiracy to Distribute and to Possess with Intent to Distribute
Marijuana
(21 U.S.C. § 846)

The Grand Jury further charges:

From in or about April 2018 through in or about June 2018, in Stoughton and Brockton,
in the District of Massachusetts, and elsewhere, the defendants,

(1) MICHAEL SPINOLA
and
(5) RUSSELL WATKINS,

conspired with each other and with other persons known and unknown to the Grand Jury, to
knowingly and intentionally distribute and possess with intent to distribute marijuana, a Schedule
I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

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

DRUG FORFEITURE ALLEGATION
(21 U.S.C. § 853)

1. Upon conviction of one or more of the offenses in violation of Title 21, United States Code, Section 846, set forth in Counts One through Three of this Indictment, the defendants,

- (1) MICHAEL SPINOLA,
- (2) CURLY KELLY,
- (3) JESUS CASTILLO,
- (4) MARCOS ROSA,
- and
- (5) RUSSELL WATKINS,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a 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, such offenses.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendant --

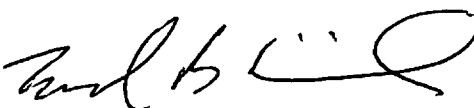
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.


All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL


FOREPERSON


THEODORE B. HEINRICH
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: August ____, 2019
Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK
HAROLD G. PUTNAM
8/7/2019 @ 12:38 pm