

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b>
<b>v.</b>	:	<b>DATE FILED: June 12, 2013</b>
<b>JESUS ESTABAN REYNOSO,</b> a/k/a "El Vi," a/k/a Esteban Ayarza	:	<b>VIOLATIONS:</b> <b>21 U.S.C. § 963 (conspiracy to import</b> <b>1 kilogram or more of heroin – 1</b> <b>count)</b>
<b>JOSE FRANCISCO GERMAN-VALLEJO,</b> a/k/a Jibrahan Davila-Maldonado, a/k/a "Chini"	:	<b>21 U.S.C. § 846 (conspiracy to</b> <b>distribute 1 kilogram or more of</b> <b>heroin – 1 count)</b> <b>21 U.S.C. § 846 (attempted possession</b> <b>with intent to distribute 1 kilogram or</b> <b>more of heroin – 1 count)</b> <b>18 U.S.C. § 2 (aiding and abetting)</b> <b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From at least the summer of 2009 through on or about April 19, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JESUS ESTABAN REYNOSO,**  
a/k/a "El Vi,"  
a/k/a Esteban Ayarza, and  
**JOSE FRANCISCO GERMAN-VALLEJO,**  
a/k/a Jibrahan Davila-Maldonado,  
a/k/a "Chini"

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally import one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, into the United States from a place outside thereof, that is, Panama, in violation of Title 21, United States Code, Section

952(a), 960(b)(1)(A).

### **MANNER AND MEANS**

It was part of the conspiracy that:

2. Defendant JESUS ESTABAN REYNOSO had a contact in Panama who was able to obtain kilogram quantities of heroin for shipment to the United States for distribution in Philadelphia and elsewhere.

3. Defendants JESUS ESTABAN REYNOSO and JOSE FRANCISCO GERMAN-VALLEJO recruited individuals to provide addresses where packages could be received from the United States Postal Service or other commercial shipping service.

4. Once an address was identified, co-conspirators in Panama concealed heroin inside of stereo speakers, and then shipped the stereo speakers to the address provided by defendant JESUS ESTABAN REYNOSO.

### **OVERT ACTS**

In furtherance of the conspiracy, and to accomplish its object, defendants JESUS ESTABAN REYNOSO and JOSE FRANCISCO GERMAN-VALLEJO committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

#### **A. The D.C. Packages**

In or about summer 2009:

1. Defendant JOSE FRANCISCO GERMAN-VALLEJO recruited D.C., known to the grand jury, to provide addresses for parcels containing controlled substances to be delivered.

2. After D.C. provided defendant JOSE FRANCISCO GERMAN-VALLEJO with an address in Philadelphia, Pennsylvania, defendant JESUS ESTABAN REYNOSO

arranged for a parcel to be delivered to that address via an international parcel service.

3. D.C. picked up the parcel and delivered it to defendant JOSE FRANCISCO GERMAN-VALLEJO, and defendant GERMAN-VALLEJO paid him for the package.

4. After D.C. provided a second address, in Lindenwold, New Jersey, defendant JESUS ESTABAN REYNOSO arranged for a parcel to be delivered to that address via an international parcel service.

5. D.C. picked up the second parcel and delivered it to defendant JESUS ESTABAN REYNOSO.

6. Defendant JESUS ESTABAN REYNOSO paid D.C. for the second parcel.

**B. The J.V. Packages**

7. In or about the summer of 2009, defendant JESUS ESTABAN REYNOSO arranged for the delivery of a parcel containing controlled substances to be delivered to the residence of J.V., on Westfield Street, in Camden, N.J.

8. Defendant JESUS ESTABAN REYNOSO picked up the Westfield parcel from J.V.

9. In or about January 2010, defendant JESUS ESTABAN REYNOSO arranged for the delivery of an additional parcel containing approximately 2 kilograms of heroin to be delivered to Westfield Street in Camden, N.J. through the United States mail, tracking number EE100040458PA (the second Westfield package).

On or about January 15, 2010:

10. Defendant JESUS ESTABAN REYNOSO conducted a tracking inquiry

on the second Westfield package.

11. Defendants JESUS ESTABAN REYNOSO and JOSE FRANCISCO GERMAN-VALLEJO drove to the Westfield Street location in order to pick up the second Westfield package.

12. Defendants JESUS ESTABAN REYNOSO and JOSE FRANCISCO GERMAN-VALLEJO left the Westfield area when they spotted law enforcement vehicles near the Westfield Street address.

**C. The M.H. Package**

13. In or about January 2010, defendant JESUS ESTABAN REYNOSO arranged for the delivery of an additional parcel containing approximately one kilogram of heroin to be delivered to an address on East Hunting Park Avenue, in Philadelphia, PA, through the United States mail, tracking number EE100076894PA (the Hunting Park package).

14. On or about January 23, 2010, defendant JESUS ESTABAN REYNOSO asked M.H., known to the grand jury, to accept delivery of the Hunting Park package.

15. On or about February 1, 2010, defendant JESUS ESTABAN REYNOSO drove to East Hunting Park Avenue and spoke to M.H. about the Hunting Park package.

All in violation of Title 21, United States Code, Section 963.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. From at least summer 2009 through on or about April 19, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JESUS ESTABAN REYNOSO,  
a/k/a “El Vi,”  
a/k/a Esteban Ayarza, and  
JOSE FRANCISCO GERMAN-VALLEJO,  
a/k/a Jibrahan Davila-Maldonado,  
a/k/a “Chini”**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

**MANNER AND MEANS**

It was part of the conspiracy that:

2. Defendant JESUS ESTABAN REYNOSO had a contact in Panama who was able to obtain kilogram quantities of heroin for shipment to the United States for distribution in Philadelphia and elsewhere.

3. Defendants JESUS ESTABAN REYNOSO and JOSE FRANCISCO GERMAN-VALLEJO recruited individuals to provide addresses where packages could be received from the United States Postal Service or other commercial shipping service.

4. Once an address was identified, co-conspirators in Panama concealed heroin inside of stereo speakers, and then shipped the stereo speakers to the address provided by defendant JESUS ESTABAN REYNOSO.

## **OVERT ACTS**

In furtherance of the conspiracy, and to accomplish its object, defendants JESUS ESTABAN REYNOSO and JOSE FRANCISCO GERMAN-VALLEJO committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

### **A. The D.C. Packages**

In or about summer 2009:

1. Defendant JOSE FRANCISCO GERMAN-VALLEJO recruited D.C., known to the grand jury, to provide addresses for parcels containing controlled substances to be delivered.
2. After D.C. provided defendant JOSE FRANCISCO GERMAN-VALLEJO with an address in Philadelphia, Pennsylvania, defendant JESUS ESTABAN REYNOSO arranged for a parcel to be delivered to that address via an international parcel service.
3. D.C. picked up the parcel and delivered it to defendant JOSE FRANCISCO GERMAN-VALLEJO, and defendant GERMAN-VALLEJO paid him for the package.
4. After D.C. provided a second address, in Lindenwold, New Jersey, defendant JESUS ESTABAN REYNOSO arranged for a parcel to be delivered to that address via an international parcel service.
5. D.C. picked up the second parcel and delivered it to defendant JESUS ESTABAN REYNOSO.
6. Defendant JESUS ESTABAN REYNOSO paid D.C. for the second parcel.

**B. The J.V. Packages**

7. In or about summer 2009, defendant JESUS ESTABAN REYNOSO arranged for the delivery of a parcel containing controlled substances to be delivered to the residence of J.V., on Westfield Street in Camden, N.J.

8. Defendant JESUS ESTABAN REYNOSO picked up the Westfield parcel from J.V.

9. In or about January 2010, defendant JESUS ESTABAN REYNOSO arranged for the delivery of an additional parcel containing approximately 2 kilograms of heroin to be delivered to Westfield Street in Camden, N.J. through the United States mail, tracking number EE100040458PA (the second Westfield package).

On or about January 15, 2010:

10. Defendant JESUS ESTABAN REYNOSO conducted a tracking inquiry on the second Westfield package.

11. Defendants JESUS ESTABAN REYNOSO and JOSE FRANCISCO GERMAN-VALLEJO drove to the Westfield Street location in order to pick up the second Westfield package.

12. Defendants JESUS ESTABAN REYNOSO and JOSE FRANCISCO GERMAN-VALLEJO left the Westfield area when they spotted law enforcement vehicles near the Westfield Street address.

**C. The M.H. Package**

13. In or about January 2010, defendant JESUS ESTABAN REYNOSO arranged for the delivery of an additional parcel containing approximately one kilogram of heroin to be delivered to an address on East Hunting Park Avenue, in Philadelphia, PA, through

the United States mail, tracking number EE100076894PA (the Hunting Park package).

14. On or about January 23, 2010, defendant JESUS ESTABAN REYNOSO asked M.H., known to the grand jury, to accept delivery of the Hunting Park package.

15. On or about February 1, 2010, defendant JESUS ESTABAN REYNOSO drove to East Hunting Park Avenue and spoke to M.H. about the Hunting Park package.

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

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 1, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JESUS ESTABAN REYNOSO,  
a/k/a “El Vi,”  
a/k/a Esteban Ayarza, and  
JOSE FRANCISCO GERMAN-VALLEJO,  
a/k/a Jibrahan Davila-Maldonado,  
a/k/a “Chini”**

knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the attempted possession with intent to distribute of, 1 kilogram or more, that is, approximately 1,066 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

**NOTICE OF FORFEITURE**  
**(21 U.S.C. § 853)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the offenses alleged in this Indictment, defendants

**JESUS ESTABAN REYNOSO,**  
**a/k/a “El Vi,”**  
**a/k/a Esteban Ayarza, and**  
**JOSE FRANCISCO GERMAN-VALLEJO,**  
**a/k/a Jibrahan Davila-Maldonado,**  
**a/k/a “Chini”**

shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violations.

2. If any of the property described in paragraph 1, 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 subdivided 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 defendants up to the value of the property described in paragraph 1.

All in violation of Title 21, United States Code, Section 853.

**A TRUE BILL:**

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**FOREPERSON**

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**ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY**