

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA  
2018 JUN -1 P 1:21  
WILLIAM W. BLEVINS  
CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**SECOND SUPERSEDING INDICTMENT FOR VIOLATIONS OF THE FEDERAL  
CONTROLLED SUBSTANCES ACT AND THE FEDERAL GUN CONTROL ACT**

UNITED STATES OF AMERICA	*	CRIMINAL NO. 18-051
v.	*	SECTION: "R"
JUAN CARLOS MOSQUERA-AMARI	*	VIOLATION: 21 U.S.C. § 846
a/k/a "Papi"		21 U.S.C. § 841(a)(1)
a/k/a "Mike"	*	21 U.S.C. § 841(b)(1)(A)
ALEXANDER MURIEL-DIAZ	*	21 U.S.C. § 841(b)(1)(C)
a/k/a "Licho"	*	18 U.S.C. § 922(g)(1)
LUIS RAMOS-GRAVEDEPERALTA	*	18 U.S.C. § 924(a)(2)
a/k/a "Cubano"	*	18 U.S.C. § 924(c)(1)(A)(i)
a/k/a "Luis Ramos-Peralta"		
CARLOS ALBERTO GONZALEZ	*	
VALENCIA		
STEVEN DUNCAN	*	
a/k/a "Guppy"		
JOSE ANTONIO VALVERDE-	*	
CHACON		
JOHN JONES	*	
a/k/a "Rookie"		
HARVEY VICTORIA-CUELLAR	*	
RODNEY ROBINSON	*	
a/k/a "Sugar Man"		
JAVIER CONTRERAS-CASTILLO	*	
GERARD HARRISON	*	

\* \* \*

The Grand Jury charges that:

\_\_\_ Fee \_\_\_\_\_  
 \_\_\_ Process \_\_\_\_\_  
 [X] Dktd \_\_\_\_\_  
 \_\_\_ CtRmDep \_\_\_\_\_  
 \_\_\_ Doc. No. \_\_\_\_\_

**COUNT 1**

**(Conspiracy to Distribute and Possess with Intent to Distribute One Kilogram or More of Heroin)**

Beginning on a date unknown, but sometime prior to July 19, 2017, and continuing to on or about June 1, 2018, in the Eastern District of Louisiana and elsewhere, the defendants, **JUAN CARLOS MOSQUERA-AMARI a/k/a “Papi” a/k/a “Mike,” ALEXANDER MURIEL-DIAZ a/k/a “Licho,” LUIS RAMOS-GRAVEDEPERALTA a/k/a “Cubano” a/k/a “Luis Ramos-Peralta,” CARLOS ALBERTO GONZALEZ VALENCIA, STEPHEN DUNCAN a/k/a “Guppy,” JOSE ANTONIO VALVERDE-CHACON, JOHN JONES a/k/a “Rookie,” HARVEY VICTORIA-CUELLAR, RODNEY ROBINSON a/k/a “Sugar Man,” JAVIER CONTRERAS-CASTILLO, and GERARD HARRISON**, did knowingly and intentionally combine, conspire, confederate and agree with each other and other persons known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute one kilogram or more of heroin, a Schedule I drug controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846.

**COUNT 2**

**(Distribution of Heroin)**

On or about July 19, 2017, in the Eastern District of Louisiana, the defendant, **RODNEY ROBINSON a/k/a “Sugar Man,”** did knowingly and intentionally distribute a quantity of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

**COUNT 3**

**(Felon in Possession of a Firearm)**

On or about April 5, 2018, in the Eastern District of Louisiana, the defendant, **JOHN JONES a/k/a “Rookie,”** having been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on May 8, 2002, in the United States District Court for the Eastern District of Louisiana, under Case No. 00-368 “K,” for conspiracy to possess with the intent to distribute 50 grams or more of cocaine base, in violation of 21 U.S.C. § 846, did knowingly possess in and affecting commerce, firearms, to wit: a Glock 27 .40 caliber semiautomatic firearm, serial number BAKK656; a Ruger P89 9mm firearm, serial number 304-72772; and a Ruger SR22 .22 caliber firearm, serial number 363-08855, said firearms having been shipped in interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT 4**

**(Possession of a Firearm During and in Relation to a Drug Trafficking Crime)**

On or about May 23, 2018, in the Eastern District of Louisiana, the defendant, **GERARD HARRISON,** did knowingly carry and use firearms, to wit: an Anderson Manufacturing AM-15 rifle, bearing serial number 16095457, and a Glock 22 .40 caliber firearm, bearing serial number BFFN126, during and in relation to a drug trafficking crime, to wit: conspiracy to distribute and to possess with the intent to distribute one kilogram or more of heroin, as alleged in Count 1 of this Second Superseding Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**NOTICE OF DRUG FORFEITURE**

1. The allegations of Counts 1 and 2 of this Second Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of the offenses charged in Counts 1 and 2 of this Second Superseding Indictment, the defendants, **JUAN CARLOS MOSQUERA-AMARI a/k/a “Papi” a/k/a “Mike,” ALEXANDER MURIEL-DIAZ a/k/a “Licho,” LUIS RAMOS-GRAVEDEPERALTA a/k/a “Cubano” a/k/a “Luis Ramos-Peralta,” CARLOS ALBERTO GONZALEZ VALENCIA, STEPHEN DUNCAN a/k/a “Guppy,” JOSE ANTONIO VALVERDE-CHACON, JOHN JONES a/k/a “Rookie,” HARVEY VICTORIA-CUELLAR, RODNEY ROBINSON a/k/a “Sugar Man,” JAVIER CONTRERAS-CASTILLO, and GERARD HARRISON, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts 1 and 2 of this Second Superseding Indictment.**

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, 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 person;
- 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 intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

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

### **NOTICE OF GUN FORFEITURE**

1. The allegations of Counts 3 and 4 of this Second Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 3 and 4 of this Second Superseding Indictment, the defendants, **JOHN JONES a/k/a "Rookie"** and **GERARD HARRISON** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461, any firearm or ammunition, which was involved in or used in knowing violation of Title 18, United States Code, Sections 922(g)(1) and 924(c), as alleged in Counts 3 and 4 of this Second Superseding Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, 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 person;
- 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 intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 922(g)(1), 924(c) and 924(d)(1).

A TRUE BILL:

F

DUANE A. EVANS  
UNITED STATES ATTORNEY



MARIA M. CARBONI  
JONATHAN L. SHIH  
Assistant United States Attorneys

New Orleans, Louisiana  
June 1, 2018

No. 18-051 "R"

**UNITED STATES DISTRICT COURT**  
Eastern            District of            Louisiana  
Criminal            Division           

**THE UNITED STATES OF AMERICA**

vs.

JUAN CARLOS MOSQUERA-AMARI, a/k/a "Papi," a/k/a "Mike,"  
ALEXANDER MURIEL-DIAZ, a/k/a "Licho," LUIS  
RAMOS-GRAVEDEPERALTA, a/k/a "Cubano," a/k/a "Luis  
Ramos-Peralta," CARLOS ALBERTO GONZALEZ VALENCIA,  
STEVEN DUNCAN, a/k/a "Guppy," JOSE ANTONIO  
VALVERDE-CHACON, JOHN DUNCAN, a/k/a "Rookie," HARVEY  
VICTORIA-CUELLAR, RODNEY ROBINSON, a/k/a "Sugar Man,"  
JAVIER CONTRERAS-CASTILLO, GERARD HARRISON

**INDICTMENT**

**INDICTMENT FOR VIOLATIONS OF THE  
FEDERAL GUN CONTROL ACT, AND THE FEDERAL  
CONTROLLED SUBSTANCES ACT**

**VIOLATIONS:** 21 U.S.C. § 846, 21 U.S.C. § 841(a)(1),  
21 U.S.C. § 841(b)(1)(A), 18 U.S.C. § 922(g)(1),  
18 U.S.C. § 924(a)(2), 21 U.S.C. § 841(b)(1)(C)

*A true bill.*



*Foreperson*

Filed in open court this            day of             
           A.D. 2018.

*Clerk*

Bail \$           



Maria M. Carboni, Assistant United States Attorney