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FILED
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U.S. DISTRICT COURT E.D.N.Y.

★ NOV 21 2019 ★

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SD:EMR
F. #2018R01222

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

LUIS TAVERAS,

Defendant.

----- X

SUPERSEDING
INDICTMENT

Cr. No. 19-180 (S-1) (RRM)
(T. 18, U.S.C., §§ 981(a)(1)(C),
1001(a)(2), 1512(a)(3)(A), 1512(k) and
3551 et seq.; T. 21, U.S.C., § 853(p);
T. 28, U.S.C., § 2461(c))

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Commit Obstruction of Justice Murder)

1. On or about June 21, 2016, within the Eastern District of New York and elsewhere, the defendant LUIS TAVERAS, together with others, did knowingly and intentionally conspire to kill another person, to wit: John Doe, an individual whose identity is known to the Grand Jury, with intent to prevent the communication by such person to a law enforcement officer of the United States of information relating to the commission and possible commission of one or more federal offenses, including, but not limited to, distribution of controlled substances in violation of Title 21, United States Code, Section 959(a), contrary to Title 18, United States Code, Section 1512(a)(1)(C).

(Title 18, United States Code, Sections 1512(k), 1512(a)(3)(A) and 3551 et seq.)

COUNT TWO
(Making False Statements)

2. On or about January 17, 2019, within the Eastern District of New York and elsewhere, the defendant LUIS TAVERAS did knowingly and intentionally make one or more materially false, fictitious and fraudulent statements and representations, in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit: the Drug Enforcement Administration (the "DEA"), in that the defendant falsely stated to DEA Special Agents that he had not witnessed the shooting of an individual at a restaurant in Cali, Colombia on or about June 21, 2016, when, in fact, as the defendant then and there well knew and believed, he had witnessed that shooting.

(Title 18, United States Code, Sections 1001(a)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT ONE

3. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

4. If any of the above-described forfeitable property, 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 intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))


FOREPERSON


RICHARD F. DONOHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2018R01222
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

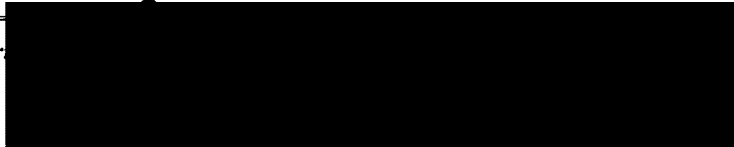
LUIS TAVERAS,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 981(a)(1)(C), 1001(a)(2), 1512(a)(3)(A), 1512(k) and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Erin Reid, Assistant U.S. Attorney (718) 254-6361