

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

8:18-cr-232-T-17JSS
CASE NO.

21 U.S.C. § 846

21 U.S.C. § 841

JEFFREY LUIS RODRIGUEZ,
also known as "Twinkie"

INDICTMENT

The Grand Jury charges:

COUNT ONE

(Conspiracy to Distribute Heroin and Fentanyl)

I. Introduction

At times relevant to this indictment:

1. Heroin and fentanyl were opioids. Opioids generally worked by binding to the human body's opioid receptors, which were found in areas of the brain that controlled pain and emotions. When opioid drugs bound to these receptors, they increased dopamine levels in the brain's reward areas, which produced a state of euphoria and relaxation. However, that relaxation came at a cost: opioids had a depressive effect on the respiratory system.

2. Too much of an opioid caused serious bodily injury in the form of an overdose event, which could have included stupor, changes in eye pupil

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size, cold and clammy skin, cyanosis (bluing of extremities), coma, and respiratory failure leading to death.

3. If a first responder or other person equipped with naloxone hydrochloride (e.g., Narcan) was able to find an overdose victim in time, it was sometimes possible to save the life of the person who had overdosed by administering a sufficient dosage of naloxone hydrochloride.

4. Heroin was an opioid processed from morphine, a naturally occurring substance extracted from the seed pod of certain varieties of poppy plants. Heroin came in a white or brownish powder or even as a black sticky substance. It was often "cut," that is, mixed, with other substances or drugs, including fentanyl.

5. Fentanyl was a synthetic opioid analgesic, that is, it was a manufactured drug that was used to relieve pain. Fentanyl was approximately 30-50 times more potent than heroin and 50-100 times more potent than morphine. Two milligrams of fentanyl - equivalent to a few grains of table salt - was considered to be a deadly dose for most of the American public. Fentanyl was often used by drug dealers as a substitute for or mixed with heroin.

6. Because of the dangers associated with these opioids, both heroin and fentanyl are controlled substances. Heroin was a Schedule I controlled substance and fentanyl was a Schedule II controlled substance.

II. The Conspiracy

7. From at least as early as March 2017 and continuing through in or about April 2018, in the Middle District of Florida, and elsewhere, the defendant,

JEFFREY LUIS RODRIGUEZ,
also known as "Twinkie,"

did knowingly, willfully, and intentionally conspire with Donald Calvin Hatch and other persons, both known and unknown to the Grand Jury, to distribute controlled substances, specifically, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, the use of said controlled substances resulting in serious bodily injury and is therefore punished under 21 U.S.C. § 841(b)(1)(C).

All in violation of 21 U.S.C. § 846.

COUNT TWO
(Distribution of Heroin)

8. On or about December 9, 2017, in the Middle District of Florida, and elsewhere, the defendant,

JEFFREY LUIS RODRIGUEZ,
also known as "Twinkie,"

did knowingly and intentionally distribute a controlled substance, which violation involved a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, resulting in serious bodily injury to Donald Calvin Hatch from the use of such substance and is therefore punished under 21 U.S.C. § 841(b)(1)(C).

In violation of 21 U.S.C. § 841(a)(1).

COUNT THREE
(Distribution of Fentanyl)

9. On or about February 1, 2018, in the Middle District of Florida, and elsewhere, the defendant,

JEFFREY LUIS RODRIGUEZ,
also known as "Twinkie,"

did knowingly and intentionally distribute a controlled substance, which violation involved a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1)(C).

In violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT FOUR
(Distribution of Heroin)

10. On or about February 5, 2018, in the Middle District of Florida,
and elsewhere, the defendant,

JEFFREY LUIS RODRIGUEZ,
also known as “Twinkie,”

did knowingly and intentionally distribute a controlled substance, which
violation involved a mixture and substance containing a detectable amount of
heroin, a Schedule I controlled substance, and is therefore punished under 21
U.S.C. § 841(b)(1)(C).

In violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT FIVE
(Distribution of Heroin)

11. On or about February 12, 2018, in the Middle District of Florida,
and elsewhere, the defendant,

JEFFREY LUIS RODRIGUEZ,
also known as “Twinkie,”

did knowingly and intentionally distribute a controlled substance, which
violation involved a mixture and substance containing a detectable amount of
heroin, a Schedule I controlled substance, and is therefore punished under 21
U.S.C. § 841(b)(1)(C).

In violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT SIX

(Distribution of Heroin and Fentanyl)

12. On or about February 13, 2018, in the Middle District of Florida, and elsewhere, the defendant,

JEFFREY LUIS RODRIGUEZ,
also known as “Twinkie,”

did knowingly and intentionally distribute a controlled substance, which violation involved a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1)(C).

In violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT SEVEN

(Distribution of Heroin and Fentanyl)

13. On or about February 14, 2018, in the Middle District of Florida, and elsewhere, the defendant,

JEFFREY LUIS RODRIGUEZ,
also known as “Twinkie,”

did knowingly and intentionally distribute a controlled substance, which violation involved a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II

controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1)(C).

In violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

FORFEITURE

1. The allegations contained in Counts One through Seven are incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 21 U.S.C. § 853.

2. Upon conviction of a violation of 21 U.S.C. § 846 or 841, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a)(1) and (2), any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

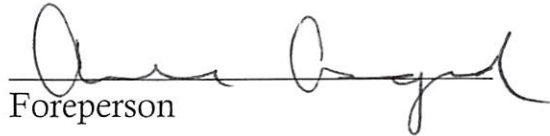
3. If any of the property described above, as a result of any acts or omissions of the defendant:

- 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

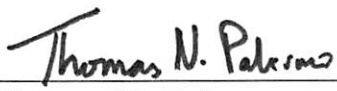
- e. has been commingled with other property, which cannot be divided without difficulty,

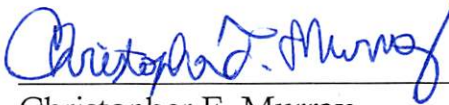
the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

A TRUE BILL,


Foreperson

MARIA CHAPA LOPEZ
United States Attorney

By: 
Thomas N. Palermo
Assistant United States Attorney

By: 
Christopher F. Murray
Assistant United States Attorney
Chief, Violent Crimes and Narcotics Section

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

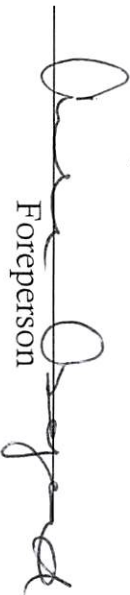
vs.

JEFFREY LUIS RODRIGUEZ
a/k/a "Twinkie"

INDICTMENT

Violations: 21 U.S.C. § 846
21 U.S.C. § 841

A true bill,


Foreperson

Filed in open court this 22nd day
of May 2018.

Clerk

Bail \$ _____

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