

RECEIVED
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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Julien Xavier Neals
	:	
v.	:	Criminal No. 23- 496 (JXN)
	:	
ROQUE RAFAEL MARTINEZ CUBAS,	:	21 U.S.C. § 963
a/k/a "Ever Arteaga,"	:	
SALVADOR LLEMPEN MEDINA,	:	
a/k/a "Viejo," and	:	
ALADINO GUEVARA SAAVEDRA,	:	
a/k/a "Alex"	:	



INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNT ONE

(Conspiracy to Distribute a Controlled Substance for Unlawful Importation)

From in or around May 2022, through in or around April 2023, in the District of New Jersey, and elsewhere, the defendants,

ROQUE RAFAEL MARTINEZ CUBAS,
a/k/a "Ever Arteaga,"
SALVADOR LLEMPEN MEDINA,
a/k/a "Viejo," and
ALADINO GUEVARA SAAVEDRA,
a/k/a "Alex,"

did knowingly and intentionally conspire and agree with each other and with others to manufacture and distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters

within a distance of 12 miles of the coast of the United States from a place outside thereof, contrary to Title 21, United States Code, Sections 959(a), 960(a)(3), and 960(b)(1)(B).

In violation of Title 21, United States Code, Section 963.

COUNT TWO

(Attempt to Distribute a Controlled Substance for Unlawful Importation)

From in or around May 2022, through in or around April 2023, in the District of New Jersey, and elsewhere, the defendants,

ROQUE RAFAEL MARTINEZ CUBAS,
a/k/a “Ever Arteaga,”
SALVADOR LLEMPEN MEDINA,
a/k/a “Viejo,” and
ALADINO GUEVARA SAAVEDRA,
a/k/a “Alex,”

did knowingly and intentionally attempt to manufacture and distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States from a place outside thereof, contrary to Title 21, United States Code, Sections 959(a), 960(a)(3), and 960(b)(1)(B).

In violation of Title 21, United States Code, Section 963.

FORFEITURE ALLEGATIONS

1. The allegations set forth in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Sections 853 and 973, upon conviction of the controlled substance offenses alleged in this Indictment, the defendants,

ROQUE RAFAEL MARTINEZ CUBAS,
a/k/a "Ever Arteaga,"
SALVADOR LLEMPEN MEDINA,
a/k/a "Viejo," and
ALADINO GUEVARA SAAVEDRA,
a/k/a "Alex,"

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 violating Title 21, United States Code, Sections 963, 959(a), 960(a)(3), and 960(b)(1)(B), and any property used or intended to be used in any manner or part to commit and to facilitate the commission of such violations as charged in this Indictment.

SUBSTITUTE ASSETS PROVISION

3. If any of the property described 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 divided without difficulty,

the United States shall be entitled, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c), to forfeiture of any other property of the defendants up to the value of the above-described forfeitable property.

A TRUE BILL,


FOREPERSON 


PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: 23- 496 (JXN)

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

**ROQUE RAFAEL MARTINEZ CUBAS,
a/k/a “Ever Arteaga,”
SALVADOR LLEMPEN MEDINA,
a/k/a “Viejo,” and
ALADINO GUEVARA SAAVEDRA,
a/k/a “Alex”**

INDICTMENT FOR

21 U.S.C. § 963

A True Bill



PHILIP R. SELLINGER
UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

JENNY CHUNG AND CLARA KIM
ASSISTANT U.S. ATTORNEYS
973-645-2909 / 973-645-2753
