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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

WELLINGTON LUNA DE LA CRUZ,
a/k/a "Orlando Luna Cruz,"
a/k/a "Luis Echevarria,"
a/k/a "El Mofle"

: Hon. *Claire C. Cecchi*
:
: Crim. No. 16- *352*
:
: 21 U.S.C. § 841
: 21 U.S.C. § 846
: 18 U.S.C. § 2
:
: Under Seal

INDICTMENT

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

Count One
(Conspiracy to Distribute Heroin)

From in or around January 2015 through in or around November 2015,
in Passaic and Bergen Counties, in the District of New Jersey and elsewhere,
the defendant,

WELLINGTON LUNA DE LA CRUZ,
a/k/a "Orlando Luna Cruz,"
a/k/a "Luis Echevarria,"
a/k/a "El Mofle,"

did knowingly and intentionally conspire with others to distribute and possess
with intent to distribute one kilogram or more of a mixture and substance
containing a detectable amount of heroin, a Schedule I controlled substance,
contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(i).

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

I HEREBY CERTIFY that the above and
foregoing is a true and correct copy of
the original on file in my office.

ATTEST *11/28/16*

WILLIAM T. WALSH, Clerk
United States District Court
District of New Jersey

M. Drayton
Deputy Clerk

Count Two
(Distribution and Possession with Intent to Distribute Heroin)

On or about November 28, 2015, in Bergen County, in the District of New Jersey, and elsewhere, the defendant,

WELLINGTON LUNA DE LA CRUZ,
a/k/a "Orlando Luna Cruz,"
a/k/a "Luis Echevarria,"
a/k/a "El Mofle,"

did knowingly and intentionally distribute and possess with intent to distribute one (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, Sections 841(a)(1) and (b)(1)(A)(i), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

1. The allegations set forth in Counts One and Two of 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. As a result of committing the controlled substance offenses alleged in Counts One and Two of this Indictment, the defendant,

WELLINGTON LUNA DE LA CRUZ,
a/k/a "Orlando Luna Cruz,"
a/k/a "Luis Echevarria,"
a/k/a "El Mofle,"

shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the violations alleged in Counts One and Two of this Indictment, 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 violation alleged in Count One of this Indictment.


3. If, by any act or omission of the defendant, any of the property subject to forfeiture described above:

- 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 21 U.S.C. § 853(p), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

A TRUE BILL,

FOREPERSON



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 16-352(CCC)

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

WELLINGTON LUNA DE LA CRUZ, a/k/a "Orlando Luna Cruz,"
a/k/a "Luis Echevarria," a/k/a "El Mofle"

INDICTMENT FOR

21 U.S.C. § 841
21 U.S.C. § 846
18 U.S.C. § 2

A True Bill,

Foreperson

PAUL J. FISHMAN
U.S. ATTORNEY
NEWARK, NEW JERSEY

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(973) 297-2074

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