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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

AT 8:30 _____ M
WILLIAM T. WALSH CLERK

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|--------------------------|---|---|
| UNITED STATES OF AMERICA | : | Criminal No. 14-699 (JBS) |
| | : | |
| v. | : | 21 U.S.C. §§ 841(a)(1), 843(b), 846 and 853 |
| | : | 18 U.S.C. §§ 922(g)(1), 1956(h), and 982 |
| TOYE TUTIS, | : | |
| a/k/a "Ahmad," | : | |
| a/k/a "Mahd," | : | |
| a/k/a "Santana," | : | |
| IVAN CUELLAR NARANJO, | : | |
| a/k/a "Fatboy," | : | |
| a/k/a "Cirilo Ruiz," | : | |
| TOZINE TILLER, | : | |
| a/k/a "To," | : | |
| KABAKA ATIBA, and | : | |
| JAZMIN VEGA | : | |

SECOND SUPERSEDING INDICTMENT

COUNT 1 – Drug Trafficking Conspiracy
(21 U.S.C. § 846)

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

From in or about February 2010 through on or about December 10, 2014, in

Atlantic County, in the District of New Jersey, and elsewhere, defendants

TOYE TUTIS, a/k/a "Ahmad," a/k/a "Mahd," a/k/a "Santana,"
IVAN CUELLAR NARANJO, a/k/a "Fatboy," a/k/a "Cirilo Ruiz,"
TOZINE TILLER, a/k/a "To,"
KABAKA ATIBA, and
JAZMIN VEGA

did knowingly and intentionally conspire and agree with each other and others to distribute and to possess with intent to distribute: (1) five kilograms or more of a mixture and substance

containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A); (2) 280 grams or more of a mixture and substance containing a detectable amount of cocaine base, that is, crack cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A); and (3) 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).

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

COUNTS 2-9 – Drug Distribution and Possession with Intent to Distribute
(21 U.S.C. § 841(a)(1))

On or about the dates indicated below, in Atlantic County, in the District of New Jersey and elsewhere, the defendants listed below did knowingly and intentionally distribute and possess with intent to distribute (1) a mixture and substance containing a detectable amount of cocaine, and (2) a mixture and substance containing a detectable amount of cocaine base, that is, crack cocaine, as indicated below, both of which are Schedule II narcotic drug controlled substances:

| COUNT | DATE OF OFFENSE | CONTROLLED SUBSTANCE | DEFENDANT |
|--------------|------------------------|--|------------------|
| 2 | October 6, 2014 | an amount of cocaine (21 U.S.C. § 841(b)(1)(C)) | Kabaka Atiba |
| 3 | October 27, 2014 | an amount of cocaine (21 U.S.C. § 841(b)(1)(C)) | Kabaka Atiba |
| 4 | June 11, 2013 | approximately 27.6 grams of cocaine base, that is, crack cocaine (21 U.S.C. § 841(b)(1)(C)) | Tozine Tiller |
| 5 | July 2, 2013 | approximately 55.5 grams of cocaine base, that is, crack cocaine (21 U.S.C. § 841(b)(1)(B)) | Tozine Tiller |
| 6 | August 9, 2013 | approximately 28.0 grams of cocaine base, that is, crack cocaine (21 U.S.C. § 841(b)(1)(B)) | Tozine Tiller |
| 7 | October 1, 2014 | 500 grams or more of cocaine (21 U.S.C. § 841(b)(1)(B)) | Toye Tutis |
| 8 | November 17, 2014 | 500 grams or more of cocaine (21 U.S.C. § 841(b)(1)(B)) | Toye Tutis |
| 9 | November 26, 2014 | 500 grams or more of cocaine (21 U.S.C. § 841(b)(1)(B)) | Toye Tutis |

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and (b)(1)(C), as indicated.

COUNTS 10-12 – Drug Distribution and Possession with Intent to Distribute and Attempt to Distribute and Possess with Intent to Distribute
(21 U.S.C. §§ 841(a)(1) and 846)

On or about the dates indicated below, in Atlantic County, in the District of New Jersey and elsewhere, the defendants listed below did knowingly and intentionally distribute and possess with intent to distribute and attempt to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance:

| COUNT | DATE OF OFFENSE | CONTROLLED SUBSTANCE | DEFENDANT |
|--------------|------------------------|--|------------------|
| 10 | October 10, 2014 | an amount of cocaine (21 U.S.C. § 841(b)(1)(C)) | Kabaka Atiba |
| 11 | October 3, 2014 | an amount of cocaine (21 U.S.C. § 841(b)(1)(C)) | Tozine Tiller |
| 12 | October 11, 2014 | an amount of cocaine (21 U.S.C. § 841(b)(1)(C)) | Tozine Tiller |

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Section 846.

COUNT 13 – Money Laundering Conspiracy
(18 U.S.C. § 1956(h))

From in or about February 2010, through on or about December 10, 2014, in Atlantic County, in the District of New Jersey, and elsewhere, defendants

TOYE TUTIS, a/k/a “Ahmad,” a/k/a “Mahd,” a/k/a “Santana,” and
JAZMIN VEGA,

knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, namely, drug trafficking, and (A) with the intent to promote the carrying on of a specified unlawful activity, and (B) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, and (C) knowing that the transactions were designed in whole and in part to avoid a transaction reporting requirement under Federal law, that is, the currency transaction reporting (“CTR”) requirement, as set forth in Title 31, United States Code, Section 5313(a) and the regulations promulgated thereunder, did knowingly and intentionally conspire and agree with each other and others to conduct financial transactions affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, specifically, the transfer, delivery and other disposition of funds that were the proceeds of narcotics trafficking, including but not limited to the proceeds of the conspiracy to distribute and possess with intent to distribute heroin, cocaine and cocaine base, as charged in Count 1, contrary to Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(a)(1)(B)(ii).

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS 14 through 25 – Use of a Telephone to Further a Drug Offense
(21 U.S.C. § 843(b))

On or about the dates and at or about the times indicated below, in the District of New Jersey and elsewhere, the defendants listed below did knowingly and intentionally use, and cause to be used, a communication facility, that is, a telephone, in committing, causing and facilitating the commission of any act constituting a felony drug offense, including the conspiracy to distribute and possess with intent to distribute cocaine, cocaine base and heroin as charged in Count 1 of this Second Superseding Indictment; in attempting to possess cocaine, cocaine base and heroin with the intent to distribute; and the distribution and possession with intent to distribute cocaine, cocaine base and heroin, all of which are felony offenses under Title 21, United States Code, Sections 841(a)(1) and 846:

| COUNT | DATE OF OFFENSE | TIME | DEFENDANTS |
|--------------|------------------------|--|---|
| 14 | October 3, 2014 | 3:54 p.m. (Session 114 on 609-742-4645) | Tozine Tiller and an unindicted co-conspirator (hereinafter "CC-1") |
| 15 | October 10, 2014 | 4:25 p.m. (Session 8 on 609-742-5390) | Tozine Tiller and CC-1 |
| 16 | October 11, 2014 | 10:45 a.m. (Session 39 on 609-742-5390) | Tozine Tiller and CC-1 |
| 17 | October 6, 2014 | 4:03 p.m. (Session 262 on 609-742-4645) | Kabaka Atiba and CC-1 |
| 18 | October 6, 2014 | 8:14 p.m. (Session 303 on 609-742-4645) | Kabaka Atiba and CC-1 |
| 19 | October 10, 2014 | 5:29 p.m. (Session 16 on 609-742-5390) | Kabaka Atiba and CC-1 |
| 20 | October 28, 2014 | 3:15 p.m. (Session 52 on 609-742-9653) | Kabaka Atiba and CC-1 |
| 21 | September 27, 2014 | 12:49 p.m. (Session 9 on 424-646-1761) | Toye Tutis and Ivan Cuellar Naranjo |
| 22 | September 27, 2014 | 2:17 p.m. (Session 13 on 424-646-1761) | Toye Tutis and Kareem Taylor |

| COUNT | DATE OF OFFENSE | TIME | DEFENDANTS |
|--------------|------------------------|---|------------------------------|
| 23 | October 4, 2014 | 6:04 p.m. (Session 122 on 424-646-1761) | Toye Tutis and Kareem Taylor |
| 24 | October 30, 2014 | 11:42 a.m. (Session 459 on 267-928-6352) | Toye Tutis and Jazmin Vega |
| 25 | November 6, 2014 | 3:43 p.m. (Session 961 on 267-928-6352) | Toye Tutis and Jazmin Vega |

In violation of Title 21, United States Code, Section 843(b).

COUNT 26 – Unlawful Possession of Firearms
(18 U.S.C. § 922(g)(1))

On or about December 11, 2014, in Pleasantville, in Atlantic County, in the District of New Jersey, and elsewhere, defendant

TOYE TUTIS, a/k/a “Ahmad,” a/k/a “Mahd,” a/k/a “Santana,”

having been convicted of a crime punishable by a term of imprisonment exceeding one year in a court in the State of New Jersey, did knowingly possess in and affecting commerce firearms, namely, a .45 caliber Taurus semiautomatic pistol, Model PT24/7 Pro, Serial Number NZ109891, loaded with 12 rounds of .45 caliber ammunition, and a .45 caliber Stoeger Arms Llama semiautomatic pistol, Model Especial, serial number obliterated, loaded with seven rounds of .45 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT 27 – Unlawful Possession of a Firearm
(18 U.S.C. § 922(g)(1))

On or about December 11, 2014, in Atlantic City, in Atlantic County, in the District of New Jersey, and elsewhere, defendant

TOYE TUTIS, a/k/a “Ahmad,” a/k/a “Mahd,” a/k/a “Santana,”

having been convicted of a crime punishable by a term of imprisonment exceeding one year in a court in the State of New Jersey, did knowingly possess in and affecting commerce a firearm, namely, a .32 caliber Harrington & Richardson revolver, Model 733, Serial Number AT134652, loaded with six rounds of Brazilian Cartridge Company .32 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

FIRST FORFEITURE ALLEGATION

The Grand Jury realleges and incorporates by reference the allegations contained in this Second Superseding Indictment for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 982. As the result of committing the money laundering offense in violation of Title 18, United States Code, Section 1956, alleged in Count 13 of this Second Superseding Indictment, defendants TOYE TUTIS, a/k/a “Ahmad,” a/k/a “Mahd,” a/k/a “Santana,” and JAZMIN VEGA shall forfeit to the United States pursuant to Title 18, United States Code, Section 982, all property, real and personal, involved in the money laundering offense and all property traceable to such property, including but not limited to the following:

1. **MONEY JUDGMENT:** A sum of money equal to at least \$1,705,368.96 in United States Currency.
2. **BANK ACCOUNTS:**
 - a) All United States currency funds or other monetary instruments credited to account number XXXX-XXXX-3115 in the name of Ta’Ja Construction I, LLC, located at Bank of America;
 - b) All United States currency funds or other monetary instruments credited to account number XXXX-XXXX-3102 in the name of Ta’Ja Real Estate Investors LLC, located at Bank of America; and
 - c) All United States currency funds or other monetary instruments credited to account number XXXX-XXXX-3128 in the name of Integrity Heating and Cooling Inc., located at Bank of America.

3. **REAL PROPERTY:**

a) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 411 Montclair (a/k/a “Montclaire” and hereinafter referred to as “Montclair”) Drive, Pleasantville, New Jersey 08232, more particularly described as: Block 323, Lot 23 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

b) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 224 Linden Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 372, Lot 13 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

c) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 18 W. Park Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 360, Lot 4 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

d) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1929 Blaine Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 493, Lot 2 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

e) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 121 W. Floral Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 35, Lot 21, on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

f) All that lot or parcel of land, together with its buildings, appurtenances,

improvements, fixtures, attachments and easements, located at 606 Alpine Court, Mays Landing, New Jersey 08330, more particularly described as: Block 996, Lot 7-C-1006 on the tax map of the Town of Mays Landing, County of Atlantic, State of New Jersey;

g) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1011 Arctic Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 314, Lot 19 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

h) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 205 W. Adams Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 120, Lot 28 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

i) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 28 W. Thompson Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 195, Lot 22 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

j) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1430 Madison Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 684, Lot 2 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

k) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 101 W. Park Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 39, Lot 27 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

l) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 2121 W. Seybert Street, Philadelphia, Pennsylvania 19121, more particularly described as: Parcel ID No. 29-1-0664-00 on the tax map of the City of Philadelphia, County of Philadelphia, Commonwealth of Pennsylvania;

m) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1629 W. Toronto Street, Philadelphia, Pennsylvania 19132, more particularly described as: Parcel ID No. 111102400 on the tax map of the City of Philadelphia, County of Philadelphia, Commonwealth of Pennsylvania;

n) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 2722 W. Master Street, Philadelphia, Pennsylvania 19121, more particularly described as: Parcel ID No. 29-2-0422-00 on the tax map of the City of Philadelphia, County of Philadelphia, Commonwealth of Pennsylvania;

o) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 6464 Dehirsch Avenue, Mays Landing, New Jersey 08330, more particularly described as: Block 504, Lot 23 on the tax map of the Town of Mays Landing, County of Atlantic, State of New Jersey;

p) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 123 W. Mulberry Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 377, Lot 18 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

q) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1115 S. Main Street, Pleasantville, New Jersey 08232, more particularly described as: Block 42, Lot 26.01 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

r) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 11 W. Adams Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 126, Lot 21 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

s) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 511 Noahs Road, Pleasantville, New Jersey 08232, more particularly described as: Block 48, Lot 10 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

t) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 627 S. New Road, Pleasantville, New Jersey 08232, more particularly described as: Block 48, Lot 12 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

u) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 619 S. New Road, Pleasantville, New Jersey 08232, more particularly described as: Block 48, Lot 16 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

v) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 709 S. New Road, Pleasantville, New Jersey 08232, more particularly described as: Block 48, Lot 57 on the tax map of the City

of Pleasantville, County of Atlantic, State of New Jersey;

w) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 2217 N. 52nd Street, Philadelphia, Pennsylvania 19131, more particularly described as: Parcel ID No. 52-1-2984-00 on the tax map of the City of Philadelphia, County of Philadelphia, Commonwealth of Pennsylvania;

x) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1009 Arctic Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 314, Lot 18 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

y) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1015 Arctic Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 315, Lot 15 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

z) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1017 Arctic Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 315, Lot 16 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

aa) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1012 Harrison Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 24, Lot 14 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

bb) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 928 Arctic Avenue, Atlantic City,

New Jersey 08401, more particularly described as: Block 301, Lot 1 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

cc) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 308 N. Connecticut Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 429, Lot 8 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

dd) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 27-29 N Virginia Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 301, Lot 76 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey; and

ee) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 19 N. Virginia Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 301, Lot 72 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey.

4. **VEHICLES:**

a) one black 2011 Chevrolet Tahoe, VIN: 1GNSKBE04BR147046; and

b) one 2011 Porsche Panamera, VIN: WP0AA2A76BL010090.

5. **CURRENCY:** \$62,084.13 in United States currency seized from 411 Montclair Drive, Pleasantville, New Jersey.

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(1) cannot be located upon the exercise of due diligence;

- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section § 982(b), 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 982 and 1956.

SECOND FORFEITURE ALLEGATION

The Grand Jury realleges and incorporates by reference the allegations contained in this Second Superseding Indictment for the purpose of noticing forfeiture pursuant to Title 21, United States Code, Section 853. As a result of committing the controlled substance offense alleged in Count 1 of this Second Superseding Indictment, defendants TOYE TUTIS, a/k/a “Ahmad,” a/k/a “Mahd,” a/k/a “Santana,” and JAZMIN VEGA 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 said defendants obtained directly or indirectly as a result of the said violation 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 1 of this Second Superseding Indictment, including but not limited to the following:

1. **MONEY JUDGMENT:** A sum of money equal to at least \$6,830,000 in United States Currency.
2. **BANK ACCOUNTS:**
 - a) All United States currency funds or other monetary instruments credited to account number XXXX-XXXX-3115 in the name of Ta’Ja Construction I, LLC, located at Bank of America;
 - b) All United States currency funds or other monetary instruments credited to account number XXXX-XXXX-3102 in the name of Ta’Ja Real Estate Investors LLC, located at Bank of America; and
 - c) All United States currency funds or other monetary instruments credited to account number XXXX-XXXX-3128 in the name of Integrity Heating and Cooling Inc., located at Bank of America.

3. **REAL PROPERTY:**

a) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 411 Montclair Drive, Pleasantville, New Jersey 08232, more particularly described as: Block 323, Lot 23 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

b) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 224 Linden Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 372, Lot 13 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

c) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 18 W. Park Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 360, Lot 4 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

d) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1929 Blaine Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 493, Lot 2 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

e) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 121 W. Floral Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 35, Lot 21, on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

f) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1106 S. Main Street,

Pleasantville, New Jersey 08232, more particularly described as: Block 232, Lot 19 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

g) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 606 Alpine Court, Mays Landing, New Jersey 08330, more particularly described as: Block 996, Lot 7-C-1006 on the tax map of the Town of Mays Landing, County of Atlantic, State of New Jersey;

h) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1011 Arctic Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 314, Lot 19 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

i) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 205 W. Adams Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 120, Lot 28 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

j) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 28 W. Thompson Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 195, Lot 22 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

k) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1430 Madison Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 684, Lot 2 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

l) All that lot or parcel of land, together with its buildings, appurtenances,

improvements, fixtures, attachments and easements, located at 101 W. Park Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 39, Lot 27 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

m) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 2121 W. Seybert Street, Philadelphia, Pennsylvania 19121, more particularly described as: Parcel ID No. 29-1-0664-00 on the tax map of the City of Philadelphia, County of Philadelphia, Commonwealth of Pennsylvania;

n) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1629 W. Toronto Street, Philadelphia, Pennsylvania 19132, more particularly described as: Parcel ID No. 111102400 on the tax map of the City of Philadelphia, County of Philadelphia, Commonwealth of Pennsylvania;

o) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 2722 W. Master Street, Philadelphia, Pennsylvania 19121, more particularly described as: Parcel ID No. 29-2-0422-00 on the tax map of the City of Philadelphia, County of Philadelphia, Commonwealth of Pennsylvania;

p) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 6464 Dehirsch Avenue, Mays Landing, New Jersey 08330, more particularly described as: Block 504, Lot 23 on the tax map of the Town of Mays Landing, County of Atlantic, State of New Jersey;

q) All that lot or parcel of land, together with its buildings, appurtenances,

improvements, fixtures, attachments and easements, located at 123 W. Mulberry Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 377, Lot 18 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

r) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1115 S. Main Street, Pleasantville, New Jersey 08232, more particularly described as: Block 42, Lot 26.01 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

s) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 11 W. Adams Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 126, Lot 21 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

t) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 511 Noahs Road, Pleasantville, New Jersey 08232, more particularly described as: Block 48, Lot 10 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

u) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 627 S. New Road, Pleasantville, New Jersey 08232, more particularly described as: Block 48, Lot 12 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

v) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 619 S. New Road, Pleasantville, New Jersey 08232, more particularly described as: Block 48, Lot 16 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

w) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 709 S. New Road, Pleasantville, New Jersey 08232, more particularly described as: Block 48, Lot 57 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

x) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 2217 N. 52nd Street, Philadelphia, Pennsylvania 19131, more particularly described as: Parcel ID No. 52-1-2984-00 on the tax map of the City of Philadelphia, County of Philadelphia, Commonwealth of Pennsylvania;

y) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1009 Arctic Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 314, Lot 18 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

z) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1015 Arctic Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 315, Lot 15 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

aa) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1017 Arctic Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 315, Lot 16 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

bb) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1012 Harrison Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 24, Lot 14 on the tax

map of the City of Pleasantville, County of Atlantic, State of New Jersey;

cc) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 928 Arctic Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 301, Lot 1 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

dd) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 308 N. Connecticut Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 429, Lot 8 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;

ee) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 27-29 N Virginia Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 301, Lot 76 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey; and

ff) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 19 N. Virginia Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 301, Lot 72 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey.

4. **VEHICLES:** one black 2003 Chevrolet Avalanche, VIN: 3GNEK13T53G275110.

5. **CURRENCY:** \$62,084.13 in United States currency seized from 411 Montclair Drive, Pleasantville, New Jersey.

If any of the above-described forfeitable property, as a result of any act or omission of the


defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 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 846 and 853.

A TRUE BILL

~~FOREPERSON~~ 



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 14-699 (JBS)

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

UNITED STATES OF AMERICA

v.

**TOYE TUTIS, a/k/a “Ahmad,” a/k/a “Mahd,” a/k/a “Santana,”
IVAN CUELLAR NARANJO, a/k/a “Fatboy,” a/k/a “Cirilo Ruiz,”
TOZINE TILLER, a/k/a “To,”
KABAKA ATIBA, and
JAZMIN VEGA**

**SECOND SUPERSEDING INDICTMENT FOR
21 U.S.C. §§ 841(a)(1), 843(b), 846 & 853
18 U.S.C. §§ 922(g)(1), 982, and 1956(h)**

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

DIANA VONDRA CARRIG
*Assistant U.S. Attorney
Camden, New Jersey
(856) 757-5026*
