

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

[1] FRANCISCO RIVERA-RIVERA,
[2] SANTIAGO RAMIREZ,
[3] TEDDY VERGARA-LOPEZ,
[4] JONATHAN CASTRO-RIVERA,

Defendants.

INDICTMENT

CRIMINAL NO. 22-328(FAB)

VIOLATIONS:

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

(TWO COUNTS & FORFEITURE
ALLEGATION)

THE GRAND JURY CHARGES:

COUNT ONE

Conspiracy to Possess with Intent to Distribute Cocaine
21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(ii), and 846

Beginning on a date unknown, but not later than May, 2022, up to and until the return of the instant Indictment, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] FRANCISCO RIVERA-RIVERA,
[2] SANTIAGO RAMIREZ,
[3] TEDDY VERGARA-LOPEZ,
[4] JONATHAN CASTRO-RIVERA,

the defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other, and with other diverse persons known and unknown to the Grand Jury to commit an offense defined in Title 21, United States Code, Section 841(a)(1), namely, possession with intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable

amount of cocaine, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(ii), and 846.

Manners and Means

As part of the manners and means of the conspiracy, the members would package the cocaine inside cardboard boxes labeled as Clorox products.



Figure 1. Port Seizure



Figure 2 Ponce Seizure

COUNT TWO
Possession with Intent to Distribute Cocaine
21 U.S.C. §§ 841(a)(1) and (b)(1)(A)(ii)

On or about July 11, 2022, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] FRANCISCO RIVERA-RIVERA,
[2] SANTIAGO RAMIREZ,
[3] TEDDY VERGARA-LOPEZ,
[4] JONATHAN CASTRO-RIVERA,

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance. All in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A)(ii) and 18 U.S.C. § 2.

NARCOTICS FORFEITURE ALLEGATION
21 U.S.C. § 853

1. The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

2. Pursuant to 21 U.S.C. § 853, upon conviction of one or more of the controlled substances alleged in Counts One and Two of this Indictment,

[1] FRANCISCO RIVERA-RIVERA,
[2] SANTIAGO RAMIREZ,
[3] TEDDY VERGARA-LOPEZ,
[4] JONATHAN CASTRO-RIVERA,

the defendants herein, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses

and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations.

1. 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,

[Intentionally left blank]

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

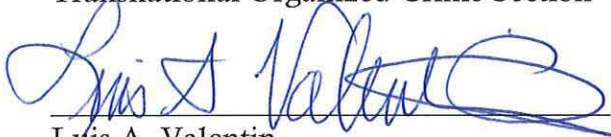
W. STEPHEN MULDROW
United States Attorney



Max Pérez-Bouret
Assistant United States Attorney, Chief
Transnational Organized Crime Section



P.O.R. Vanessa E. Bonhomme
Assistant United States Attorney, Deputy Chief
Transnational Organized Crime Section



Luis A. Valentin
Assistant United States Attorney

TRUE BILL

FOREPERSON

Date: July 20, 2022