

COUNT ONE

(Conspiracy to Distribute Narcotics - Cocaine and Marijuana)

The Grand Jury charges:

1. From at least in or about late 2012 up to and including in or about December 2015, in the Southern District of New York and elsewhere, MARIO HERRERA, a/k/a "Mo," JOHN MIRANDA, JOEL CASADO, a/k/a "Cojo," CESAR DOMINGUEZ, JOEL QUEZADA, a/k/a "J-Buff," JONATHAN MORALES, a/k/a "Blood," and OLIVEROS VILLAREAL, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that MARIO HERRERA, a/k/a "Mo," JOHN MIRANDA, JOEL CASADO, a/k/a "Cojo," CESAR DOMINGUEZ, JOEL QUEZADA, a/k/a "J-Buff," JONATHAN MORALES, a/k/a "Blood," and OLIVEROS VILLAREAL, the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that MARIO HERRERA, a/k/a "Mo," JOHN MIRANDA, JOEL CASADO, a/k/a "Cojo," CESAR DOMINGUEZ, JOEL QUEZADA, a/k/a "J-Buff," JONATHAN MORALES, a/k/a "Blood," and OLIVEROS VILLAREAL, the defendants, conspired to distribute and possess with the intent to distribute were (i) five

kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (ii) mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

(Title 21, United States Code, Section 846.)

COUNT TWO

(Conspiracy to Distribute Narcotics - Oxycodone)

The Grand Jury further charges:

4. From at least in or about late 2012 up to and including in or about December 2015, in the Southern District of New York and elsewhere, MARIO HERRERA, a/k/a "Mo," JOHN MIRANDA, JOEL CASADO, a/k/a "Cojo," CESAR DOMINGUEZ, JOEL QUEZADA, a/k/a "J-Buff," THOMAS ABREU, a/k/a "TJ," JONATHAN GOLDEN, a/k/a "Johnny," CYNTHIA URRRA, DEBRA MONCHE, EZEQUIL NIN, a/k/a "Seki," ANDREW SEIBERT, a/k/a "Blue," CARLOS ALVAREZ-GONZALEZ, a/k/a "Pops," KEITH WOODARDS, ALEXANDER CARNO, and KEVIN SKEETE, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

5. It was a part and an object of the conspiracy that MARIO HERRERA, a/k/a "Mo," JOHN MIRANDA, JOEL CASADO, a/k/a "Cojo," CESAR DOMINGUEZ, JOEL QUEZADA, a/k/a "J-Buff," THOMAS

ABREU, a/k/a "TJ," JONATHAN GOLDEN, a/k/a "Johnny," CYNTHIA URRA, DEBRA MONCHE, EZEQUIL NIN, a/k/a "Seki," ANDREW SEIBERT, a/k/a "Blue," CARLOS ALVAREZ-GONZALEZ, a/k/a "Pops," KEITH WOODARDS, ALEXANDER CARNO, and KEVIN SKEETE, the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

6. The controlled substance that MARIO HERRERA, a/k/a "Mo," JOHN MIRANDA, JOEL CASADO, a/k/a "Cojo," CESAR DOMINGUEZ, JOEL QUEZADA, a/k/a "J-Buff," THOMAS ABREU, a/k/a "TJ," JONATHAN GOLDEN, a/k/a "Johnny," CYNTHIA URRA, DEBRA MONCHE, EZEQUIL NIN, a/k/a "Seki," ANDREW SEIBERT, a/k/a "Blue," CARLOS ALVAREZ-GONZALEZ, a/k/a "Pops," KEITH WOODARDS, ALEXANDER CARNO, and KEVIN SKEETE, the defendants, conspired to distribute and possess with the intent to distribute was quantities of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION WITH RESPECT TO COUNT ONE

7. As a result of committing the controlled substance offense alleged in Count One of this Indictment, MARIO HERRERA, a/k/a "Mo," JOHN MIRANDA, JOEL CASADO, a/k/a "Cojo," CESAR DOMINGUEZ, JOEL QUEZADA, a/k/a "J-Buff," JONATHAN MORALES, a/k/a "Blood," and OLIVEROS VILLAREAL, the defendants, shall forfeit

to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendants obtained directly or indirectly as a result of the violation alleged in Count One of this Indictment and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of the violation, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offense.

FORFEITURE ALLEGATION WITH RESPECT TO COUNT TWO

8. As a result of committing the controlled substance offense alleged in Count Two of this Indictment, MARIO HERRERA, a/k/a "Mo," JOHN MIRANDA, JOEL CASADO, a/k/a "Cojo," CESAR DOMINGUEZ, JOEL QUEZADA, a/k/a "J-Buff," THOMAS ABREU, a/k/a "TJ," JONATHAN GOLDEN, a/k/a "Johnny," CYNTHIA URRRA, DEBRA MONCHE, EZEQUIL NIN, a/k/a "Seki," ANDREW SEIBERT, a/k/a "Blue," CARLOS ALVAREZ-GONZALEZ, a/k/a "Pops," KEITH WOODARDS, ALEXANDER CARNO, and KEVIN SKEETE, the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendants obtained directly or indirectly as a result of the violation alleged in Count Two of this Indictment and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of the violation, including but not

limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offense.

Substitute Assets Provision

9. If any of the property described above as being subject to forfeiture, 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 person;
- 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 subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1) and 853.)


FOREPERSON


PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

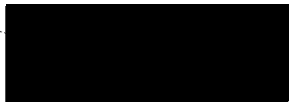
MARIO HERRERA, et al.,

Defendants.

SEALED INDICTMENT

16 Cr.

(21 U.S.C. §§ 846, 853)



Foreperson.

PREET BHARARA

United States Attorney.
