

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
JHOAN ADAMES, :
a/k/a "Chelo," :
ROLANDO NIEVES, :
a/k/a "Rolo," :
JASON NIEVES-PINO, :
JOSE NIEVES-HERRERA, :
JOSE RUBERT, :
PERVIS MARCUS, :
JUSTIN FABRICANT, :
ANICASIO HERNANDEZ, :
a/k/a "Nick," :
OSVALDO MANGUALBONET, and :
FRANK VELEZ, :
a/k/a "Frankie," :
:
Defendants. :
:
- - - - - X

SEALED INDICTMENT
18 Cr. 776)

COUNT ONE

(Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about 2017 up to and including at least in or about August 2018, in the Southern District of New York and elsewhere, JHOAN ADAMES, a/k/a "Chelo," ROLANDO NIEVES, a/k/a "Rolo," JASON NIEVES-PINO, JOSE NIEVES-HERRERA, JOSE RUBERT, PERVIS MARCUS, JUSTIN FABRICANT, ANICASIO HERNANDEZ, a/k/a "Nick," OSVALDO MANGUALBONET, FRANK VELEZ, a/k/a "Frankie," 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 JHOAN ADAMES, a/k/a "Chelo," ROLANDO NIEVES, a/k/a "Rolo," JASON NIEVES-PINO, JOSE NIEVES-HERRERA, JOSE RUBERT, PERVIS MARCUS, JUSTIN FABRICANT, ANICASIO HERNANDEZ, a/k/a "Nick," OSVALDO MANGUALBONET, FRANK VELEZ, a/k/a "Frankie," 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 ROLANDO NIEVES, a/k/a "Rolo," JASON NIEVES-PINO, JOSE NIEVES-HERRERA, JOSE RUBERT, and PERVIS MARCUS, the defendants, conspired to distribute and to possess with the intent to distribute were: (a) 280 grams and more of mixtures and substances containing a detectable amount of crack cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (b) 500 grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

4. The controlled substance that JHOAN ADAMES, a/k/a "Chelo," and FRANK VELEZ, a/k/a "Frankie," the defendants, conspired to distribute and to possess with the intent to distribute was 280 grams and more of mixtures and substances

containing a detectable amount of crack cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

5. The controlled substance that JUSTIN FABRICANT, ANICASIO HERNANDEZ, a/k/a "Nick," and OSVALDO MANGUALBONET, the defendants, conspired to distribute and to possess with the intent to distribute was 500 grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

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

FORFEITURE ALLEGATION

6. As a result of committing the offense alleged in Count One of this Indictment, JHOAN ADAMES, a/k/a "Chelo," ROLANDO NIEVES, a/k/a "Rolo," JASON NIEVES-PINO, JOSE NIEVES-HERRERA, JOSE RUBERT, PERVIS MARCUS, JUSTIN FABRICANT, ANICASIO HERNANDEZ, a/k/a "Nick," OSVALDO MANGUALBONET, FRANK VELEZ, a/k/a "Frankie," the defendants, 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 obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

SUBSTITUTE ASSET PROVISION

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

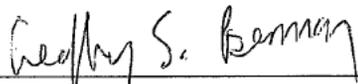
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be divided without difficulty;

it is the intent 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, Section 853.)



FOREPERSON



GEOFFREY S. BERMAN
United States Attorney

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PINO, JOSE NIEVES-HERRERA, JOSE RUBERT,
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ANICASIO HERNANDEZ, a/k/a "Nick,"
OSVALDO MANGUALBONET, FRANK VELEZ,
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(21 U.S.C. § 846.)

GEOFFREY S. BERMAN
United States Attorney


Foreperson
