

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
UNITED STATES OF AMERICA :
- v. - :
RAMON SOLLA, :
a/k/a "Ray," :
a/k/a "RB," :
Defendant. :
----- X

SEALED INDICTMENT

19 Cr. ()

19 CRIM 740

COUNT ONE

The Grand Jury charges:

1. On or about March 3, 1995, in the Southern District of New York and elsewhere, RAMON SOLLA, a/k/a "Ray," a/k/a "RB," the defendant, willfully and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, a conspiracy to distribute heroin, did use and carry a firearm, and, in furtherance of such drug trafficking crime, did possess a firearm, and in the course of that drug trafficking crime did, through the use of a firearm, cause the death of Ricky Santiago on a rooftop in the vicinity of 250 East 105th Street in Manhattan, which killing was murder as defined in Title 18, United States Code, Section 1111(a), and did aid and abet the same.

(Title 18, United States Code, Sections 924(j) and 2.)

COUNT TWO

The Grand Jury further charges:

2. On or about March 3, 1995, in the Southern District of New York and elsewhere, RAMON SOLLA, a/k/a "Ray," a/k/a "RB," the defendant, willfully and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, a conspiracy to distribute heroin, did use and carry a firearm, and, in furtherance of such drug trafficking crime, did possess a firearm, and in the course of that drug trafficking crime did, through the use of a firearm, cause the death of Christopher Torro a/k/a "Christopher Rossy," on a rooftop in the vicinity of 250 East 105th Street in Manhattan, which killing was murder as defined in Title 18, United States Code, Section 1111(a), and did aid and abet the same.

(Title 18, United States Code, Sections 924(j) and 2.)

COUNT THREE

The Grand Jury further charges:

3. On or about March 3, 1995, in the Southern District of New York, while engaged in an offense punishable under Section 841(b)(1)(A) of Title 21, United States Code, namely a conspiracy to distribute one kilogram and more of heroin, RAMON SOLLA, a/k/a "Ray," a/k/a "RB," the defendant, and others known and unknown, intentionally and knowingly killed and counseled,

commanded, induced, procured, and caused the intentional killing of Ricky Santiago and such killing resulted, to wit, SOLLA shot and killed Santiago on a rooftop in the vicinity of 250 East 105th Street in Manhattan.

(Title 21, United States Code, Section 848(e)(1)(A); Title 18, United States Code, Section 2.)

COUNT FOUR

The Grand Jury further charges:

4. On or about March 3, 1995, in the Southern District of New York, while engaged in an offense punishable under Section 841(b)(1)(A) of Title 21, United States Code, namely a conspiracy to distribute one kilogram and more of heroin, RAMON SOLLA, a/k/a "Ray," a/k/a "RB," the defendant, and others known and unknown, intentionally and knowingly killed and counseled, commanded, induced, procured, and caused the intentional killing of Christopher Torro a/k/a "Christopher Rossy," and such killing resulted, to wit, SOLLA shot and killed Torro on a rooftop in the vicinity of 250 East 105th Street in Manhattan.

(Title 21, United States Code, Section 848(e)(1)(A); Title 18, United States Code, Section 2.)

SPECIAL FINDINGS

5. Counts One and Three of this Indictment are realleged and incorporated by reference as though fully set forth herein. As to Counts One and Three, alleging the murder of Ricky Santiago, the defendant RAMON SOLLA, a/k/a "Ray," a/k/a "RB":

a. was 18 years of age or older at the time of the offense;

b. intentionally killed the victim (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of the victim (Title 18, United States Code, Section 3591(a)(2)(B)); and

d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)).

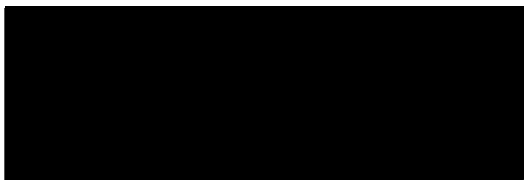
6. Counts Two and Four of this Indictment are realleged and incorporated by reference as though fully set forth herein. As to Counts Two and Four, alleging the murder of Christopher Torro, a/k/a "Christopher Rossy," the defendant RAMON SOLLA, a/k/a "Ray," a/k/a "RB":

a. was 18 years of age or older at the time of the offense;

b. intentionally killed the victim (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of the victim (Title 18, United States Code, Section 3591(a)(2)(B)); and

d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)).



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(21 U.S.C. § 848(e),
18 U.S.C. §§ 924(j) and 2.)

GEOFFREY S. BERMAN

FORPELSON
