

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ROBERTO SANCHEZ and  
JULIO ABREU,

Defendants.

SEALED INDICTMENT

19 Cr.

**19 CRIM 820**

COUNT ONE

The Grand Jury charges:

1. From at least in or about January 2019, up to and including in or about November 2019, in the Southern District of New York and elsewhere, ROBERTO SANCHEZ and JULIO ABREU, 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 ROBERTO SANCHEZ and JULIO ABREU, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that ROBERTO SANCHEZ and JULIO ABREU, the defendants, conspired to distribute and possess

with intent to distribute were: (i) mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C); (ii) mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (iii) 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.)

#### **FORFEITURE ALLEGATION**

4. As a result of committing the offense charged in Count One of this Indictment, ROBERTO SANCHEZ and JULIO ABREU, 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 that the defendants personally obtained.

#### **Substitute Assets Provision**

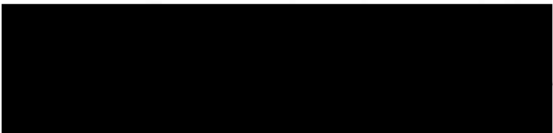
5. If any of the property described above as subject to forfeiture, as a result of any act or omission of the above-

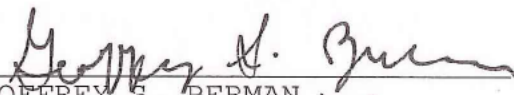
named defendants:

- 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 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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(21 U.S.C. § 846.)

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GEOFFREY S. BERMAN  
United States Attorney.

A TRUE BILL

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Foreperson.

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