

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-v.-

JOSE SERGIO MARTINEZ-AGUILAR,
a/k/a "Orejon,"
a/k/a "Andy,"
a/k/a "Pa,"

VLADIMIR PULSTILINKOV,
a/k/a "The Russian,"

MIGUEL LOVOS,

SEBASTIAN RAMOS,
a/k/a "Nimo,"

RICARDO RUIZ-SALINAS,

Defendants.
----- X

SEALED INDICTMENT

20 CRIM-333

COUNT ONE

(Narcotics Conspiracy - Cocaine)

1. From at least in or about June 2019, up to and including in or about June 2020, in the Southern District of New York and elsewhere, JOSE SERGIO MARTINEZ-AGUILAR, a/k/a "Orejon," a/k/a "Andy," a/k/a "Pa," VLADIMIR PULSTILINKOV, a/k/a "The Russian," MIGUEL LOVOS, SEBASTIAN RAMOS, a/k/a "Nimo," and RICARDO RUIZ-SALINAS, 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 JOSE SERGIO MARTINEZ-AGUILAR, a/k/a "Orejon," a/k/a "Andy," a/k/a "Pa," VLADIMIR PULSTILINKOV, a/k/a "The Russian," MIGUEL LOVOS, SEBASTIAN RAMOS, a/k/a "Nimo," and RICARDO RUIZ-SALINAS, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that JOSE SERGIO MARTINEZ-AGUILAR, a/k/a "Orejon," a/k/a "Andy," a/k/a "Pa," VLADIMIR PULSTILINKOV, a/k/a "The Russian," MIGUEL LOVOS, SEBASTIAN RAMOS, a/k/a "Nimo," and RICARDO RUIZ-SALINAS, the defendants, conspired to distribute and possess with intent to distribute was 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).

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

COUNT TWO

(Narcotics Conspiracy - Fentanyl and Heroin)

4. From at least in or about April 2020, up to and including in or about June 2020, in the Southern District of New York and elsewhere, JOSE SERGIO MARTINEZ-AGUILAR, a/k/a "Orejon," a/k/a "Andy," a/k/a "Pa," and MIGUEL LOVOS, 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 JOSE SERGIO MARTÍNEZ-AGUILAR, a/k/a "Orejon," a/k/a "Andy," a/k/a "Pa," and MIGUEL LOVOS, 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).

6. The controlled substances that JOSE SERGIO MARTINEZ-AGUILAR, a/k/a "Orejon," a/k/a "Andy," a/k/a "Pa," and MIGUEL LOVOS, the defendants, conspired to distribute and possess with intent to distribute were: (i) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (ii) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section §46.)

COUNT THREE

(Narcotics Conspiracy - Methamphetamine)

7. From at least in or about April 2020, up to and including in or about June 2020, in the Southern District of New York and elsewhere, JOSE SERGIO MARTINEZ-AGUILAR, a/k/a "Orejon," a/k/a "Andy," a/k/a "Pa," VLADIMIR PULSTILINKOV, a/k/a "The Russian,"

and MIGUEL LOVOS, 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.

8. It was a part and an object of the conspiracy that JOSE SERGIO MARTINEZ-AGUILAR, a/k/a "Orejon," a/k/a "Andy," a/k/a "Pa," VLADIMIR PULSTILINKOV, a/k/a "The Russian," and MIGUEL LOVOS, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

9. The controlled substance that JOSE SERGIO MARTINEZ-AGUILAR, a/k/a "Orejon," a/k/a "Andy," a/k/a "Pa," VLADIMIR PULSTILINKOV, a/k/a "The Russian," and MIGUEL LOVOS, the defendants, conspired to distribute and possess with intent to distribute was 500 grams and more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

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

COUNT FOUR

(Firearms Offense)

10. From at least in or about June 2019, up to and including in or about June 2020, in the Southern District of New York and elsewhere, JOSE SERGIO MARTINEZ-AGUILAR, a/k/a "Orejon," a/k/a

"Andy," a/k/a "Pa," and MIGUEL LOVOS, the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracies charged in Counts One, Two, and Three of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying and possession of a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT FIVE

(Firearms Offense)

11. From at least in or about June 2019, up to and including in or about June 2020, in the Southern District of New York and elsewhere, VLADIMIR PULSTILINKOV, a/k/a "The Russian," the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics conspiracies charged in Counts One and Three of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying and possession of a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

FORFEITURE ALLEGATION

12. As a result of committing the offense alleged in Count One of this Indictment, JOSE SERGIO MARTINEZ-AGUILAR, a/k/a "Orejon," a/k/a "Andy," a/k/a "Pa," VLADIMIR PULSTILINKOV, a/k/a

"The Russian," MIGUEL LOVOS, SEBASTIAN RAMOS, a/k/a "Nimo," and RICARDO RUIZ-SALINAS, 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 any proceeds traceable to the commission of said offense.

13. As a result of committing the offense alleged in Count Two of this Indictment, JOSE SERGIO MARTINEZ-AGUILAR, a/k/a "Gregon," a/k/a "Andy," a/k/a "Pa," and MIGUEL LOVOS, 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 any proceeds traceable to the commission of said offense.

14. As a result of committing the offense alleged in Count Three of this Indictment, JOSE SERGIO MARTINEZ-AGUILAR, a/k/a

"Orejon," a/k/a "Andy," a/k/a "Pa," VLADIMIR PULSTILINKOV, a/k/a "The Russian," and MIGUEL LOVOS, 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 any proceeds traceable to the commission of said offense.

SUBSTITUTE ASSETS PROVISION

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

- 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.)

[REDACTED]

FOREPERSON

Audrey Strauss
AUDREY STRAUSS
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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RICARDO RUIZ-SALINAS,

Defendant.

SEALED INDICTMENT

20 Cr. ____

(21 U.S.C. § 846; 18 U.S.C. §§ 924(c)
and 2.)

AUDREY STRAUSS
Acting United States Attorney


Foreperson
