

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- v. -

SEALED
SUPERSEDING INDICTMENT

ALEXANDER FRANCISCO,
a/k/a "Javy,"
ARISTIDES RAMIREZ,
a/k/a "AR,"
DAVID GLOVER,
ALVIN EUSEBIO,
a/k/a "Goo,"
ALEX GARCIA,
a/k/a "AG,"
ANEUDY ALVARADO,
a/k/a "Smiley,"
EDWARD RODRIGUEZ,
JERIEL ABREU,
a/k/a "Jerry Gunz,"
RAY EDUARDO,
LAZARETH PAULINO,
a/k/a "Laz,"
JONATHAN RODRIGUEZ,
a/k/a "JR,"
JAWAN MILLS,
a/k/a "JD,"
JOAN MERCEDES,
a/k/a "Saul,"
EDDY CAMINERO,
a/k/a "Malibu,"
ENMANUEL LIRIANO,
a/k/a "Chubster,"
a/k/a "Eman," and
CHRISTOPHER SANTOS,
a/k/a "Casper,"

S1 22 Cr. 522 (GHW)

Defendants.

----- X

COUNT ONE
(Narcotics Trafficking Conspiracy)

The Grand Jury charges:

1. From at least in or about 2019, up to and including January 2023, in the Southern District of New York and elsewhere, ALEXANDER FRANCISCO, a/k/a "Javy," ARISTIDES RAMIREZ, a/k/a "AR," DAVID GLOVER, ALVIN EUSEBIO, a/k/a "Goo," ALEX GARCIA, a/k/a "AG," ANEUDY ALVARADO, a/k/a "Smiley," EDWARD RODRIGUEZ, JERIEL ABREU, a/k/a "Jerry Gunz," RAY EDUARDO, LAZARETH PAULINO, a/k/a "Laz," JONATHAN RODRIGUEZ, a/k/a "JR," JAWAN MILLS, a/k/a "JD," JOAN MERCEDES, a/k/a "Saul," EDDY CAMINERO, a/k/a "Malibu," ENMANUEL LIRIANO, a/k/a "Chubster," a/k/a "Eman," and CHRISTOPHER SANTOS, a/k/a "Casper," 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 ALEXANDER FRANCISCO, a/k/a "Javy," ARISTIDES RAMIREZ, a/k/a "AR," DAVID GLOVER, ALVIN EUSEBIO, a/k/a "Goo," ALEX GARCIA, a/k/a "AG," ANEUDY ALVARADO, a/k/a "Smiley," EDWARD RODRIGUEZ, JERIEL ABREU, a/k/a "Jerry Gunz," RAY EDUARDO, LAZARETH PAULINO, a/k/a "Laz," JONATHAN RODRIGUEZ, a/k/a "JR," JAWAN MILLS, a/k/a "JD," JOAN MERCEDES, a/k/a "Saul," EDDY CAMINERO, a/k/a "Malibu," ENMANUEL LIRIANO, a/k/a "Chubster," a/k/a "Eman," and CHRISTOPHER SANTOS,

a/k/a "Casper," 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 ALEXANDER FRANCISCO, a/k/a "Javy," ARISTIDES RAMIREZ, a/k/a "AR," DAVID GLOVER, ALVIN EUSEBIO, a/k/a "Goo," ALEX GARCIA, a/k/a "AG," ANEUDY ALVARADO, a/k/a "Smiley," EDWARD RODRIGUEZ, JERIEL ABREU, a/k/a "Jerry Gunz," RAY EDUARDO, LAZARETH PAULINO, a/k/a "Laz," JONATHAN RODRIGUEZ, a/k/a "JR," JAWAN MILLS, a/k/a "JD," JOAN MERCEDES, a/k/a "Saul," EDDY CAMINERO, a/k/a "Malibu," ENMANUEL LIRIANO, a/k/a "Chubster," a/k/a "Eman," and CHRISTOPHER SANTOS, a/k/a "Casper," the defendants, conspired to distribute and possess with intent to distribute were (i) 500 grams and more of mixtures and substances 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); (ii) 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); (iii) mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C); (iv) mixtures and substances containing a detectable amount of fentanyl, in violation of Title

21, United States Code, Section 841(b)(1)(C); and (v) mixtures and substances containing a detectable amount of oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C).

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

COUNT TWO
(Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

4. From at least in or about 2019, up to and including January 2023, in the Southern District of New York and elsewhere, in the Southern District of New York and elsewhere, ALEXANDER FRANCISCO, a/k/a "Javy," ARISTIDES RAMIREZ, a/k/a "AR," DAVID GLOVER, ALVIN EUSEBIO, a/k/a "Goo," ALEX GARCIA, a/k/a "AG," ANEUDY ALVARADO, a/k/a "Smiley," EDWARD RODRIGUEZ, JERIEL ABREU, a/k/a "Jerry Gunz," RAY EDUARDO, LAZARETH PAULINO, a/k/a "Laz," JONATHAN RODRIGUEZ, a/k/a "JR," JAWAN MILLS, a/k/a "JD," JOAN MERCEDES, a/k/a "Saul," EDDY CAMINERO, a/k/a "Malibu," ENMANUEL LIRIANO, a/k/a "Chubster," a/k/a "Eman," and CHRISTOPHER SANTOS, a/k/a "Casper," 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 trafficking conspiracy charged in Count One of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm during the narcotics trafficking conspiracy charged in Count One of this Indictment, and did aid and abet the same.

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

FORFEITURE ALLEGATIONS

5. As a result of committing the offense alleged in Count One of this Indictment, ALEXANDER FRANCISCO, a/k/a "Javy," ARISTIDES RAMIREZ, a/k/a "AR," DAVID GLOVER, ALVIN EUSEBIO, a/k/a "Goo," ALEX GARCIA, a/k/a "AG," ANEUDY ALVARADO, a/k/a "Smiley," EDWARD RODRIGUEZ, JERIEL ABREU, a/k/a "Jerry Gunz," RAY EDUARDO, LAZARETH PAULINO, a/k/a "Laz," JONATHAN RODRIGUEZ, a/k/a "JR," JAWAN MILLS, a/k/a "JD," JOAN MERCEDES, a/k/a "Saul," EDDY CAMINERO, a/k/a "Malibu," ENMANUEL LIRIANO, a/k/a "Chubster," a/k/a "Eman," and CHRISTOPHER SANTOS, a/k/a "Casper," 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.

6. As a result of committing the offense alleged in Count Two of this Indictment, ALEXANDER FRANCISCO, a/k/a "Javy," ARISTIDES RAMIREZ, a/k/a "AR," DAVID GLOVER, ALVIN EUSEBIO, a/k/a "Goo," ALEX GARCIA, a/k/a "AG," ANEUDY ALVARADO, a/k/a "Smiley,"

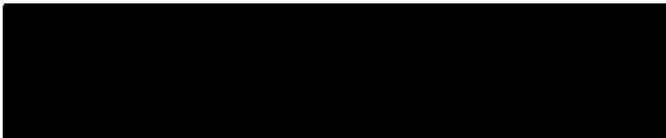
EDWARD RODRIGUEZ, JERIEL ABREU, a/k/a "Jerry Gunz," RAY EDUARDO, LAZARETH PAULINO, a/k/a "Laz," JONATHAN RODRIGUEZ, a/k/a "JR," JAWAN MILLS, a/k/a "JD," JOAN MERCEDES, a/k/a "Saul," EDDY CAMINERO, a/k/a "Malibu," ENMANUEL LIRIANO, a/k/a "Chubster," a/k/a "Eman," and CHRISTOPHER SANTOS, a/k/a "Casper," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in said offense.

Substitute Assets 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 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.)



Damian Williams

DAMIAN WILLIAMS
United States Attorney

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

DAMIAN WILLIAMS

United States Attorney

