

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
EDWIN CABRAL MORA, :
a/k/a "Sosa" :
:
Defendant. :
:
- - - - - X

SEALED INDICTMENT

16 Cr.

COUNT ONE

The Grand Jury charges:

1. From at least in or about January 2016 through at least in or about May 2016, in the Southern District of New York and elsewhere, EDWIN CABRAL MORA, a/k/a "Sosa," the defendant, 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 EDWIN CABRAL MORA, a/k/a "Sosa," the defendant, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that EDWIN CABRAL MORA, a/k/a "Sosa," the defendant, conspired to distribute and possess with the intent to distribute was 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 846.)

COUNT TWO

The Grand Jury further charges:

4. From at least in or about April 2016 through at least in or about May 2016, in the Southern District of New York and elsewhere, EDWIN CABRAL MORA, a/k/a "Sosa," the defendant, unlawfully and knowingly seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away and held for ransom and reward and otherwise a person, and in so doing used a means, facility, and instrumentality of interstate and foreign commerce, and aided and abetted the same, to wit, CABRAL MORA used a phone to lure an individual ("Victim-1") from New York to Georgia, where Victim-1 was transported by car to an apartment in which CABRAL MORA and others blindfolded, bound, beat, and tortured Victim-1 by burning Victim-1's skin.

(Title 18, United States Code, Sections 1201(a)(1) and 2.)

COUNT THREE

The Grand Jury further charges:

5. From at least in or about April 2016 through at least in or about May 2016, in the Southern District of New York and elsewhere, EDWIN CABRAL MORA, a/k/a "Sosa," the defendant, and others known and unknown, willfully and knowingly did combine,

conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1201(a)(1).

6. It was a part and object of the conspiracy that EDWIN CABRAL MORA, a/k/a "Sosa," the defendant, and others known and unknown, did unlawfully and knowingly seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise a person, and in so doing did use a means, facility, and instrumentality of interstate and foreign commerce, in violation of Title 18, United States Code, Section 1201(a)(1).

OVERT ACT

7. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. In or about April 2016, EDWIN CABRAL MORA, a/k/a "Sosa," the defendant, called Victim-1 by phone, when Victim-1 was in the Bronx, New York, to lure Victim-1 to Georgia.

(Title 18, United States Code, Section 1201(c).)

COUNT FOUR

The Grand Jury further charges:

8. From at least in or about April 2016 through at least in or about May 2016, in the Southern District of New York and elsewhere, EDWIN CABRAL MORA, a/k/a "Sosa," 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 conspiracy charged in Count One of this Indictment, and during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the kidnapping charged in Count Two of this Indictment, and the conspiracy charged in Count Three of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crimes, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, which were brandished.

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

FORFEITURE ALLEGATION

9. As a result of committing the controlled substance offense alleged in Count One of this Indictment, EDWIN CABRAL MORA, a/k/a "Sosa," the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendant obtained directly or indirectly as a result of the violation and

any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of the violation alleged in Count One of this Indictment, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offense.

10. As a result of committing the offense alleged in Count Two of this Indictment, EDWIN CABRAL MORA, a/k/a "Sosa," the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461, any and all property constituting or derived from any proceeds said defendant obtained directly or indirectly as a result of the violation, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offense.

11. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the 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 18, United States Code, Section 981(a)(1)(C), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

(Title 18, United States Code, Section 981(a)(1)(C), Title 21, United States Code, Section 853(p), Title 28, United States Code, Section 2461(c).)

FOREPERSON

Preet Bhar

PREET BHARARA
United States Attorney

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a/k/a "Sosa,"

Defendant.

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16 Cr.

(18 U.S.C. §§ 1201(a)(1), 1201(c),
924(c), and 2; and 21 U.S.C. § 846.)

PREET BHARARA

United States Attorney.

foreperson.
