

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
UNITED STATES OF AMERICA :

- v. - :

GABRIEL GUILLEN, :  
a/k/a "Toti," :

EDWARD JIMENEZ, :  
a/k/a "Buzzy," :

ZORAIDA RAMIREZ, :

WILSON GUILLEN, :

JOEL TAPIA, :  
a/k/a "Emelio Vasquez," :

MATTHEW VASQUEZ, :  
a/k/a "Cabeza," :

YEISON SALDANA, :  
a/k/a "Jay," :

JASON LLANES, :  
a/k/a "Jay Murder," :

GABRIEL CARRION, :  
a/k/a "Gaby," :

MOISES SUERO, :

RICHARD JOSE, :  
a/k/a "Kiki," :

JHOAN PICHARDO, :  
a/k/a "Flaco," :

RAFAEL RODRIGUEZ, :  
a/k/a "Rafi," and :

CARLOS PEREZ, :  
a/k/a "Los," :

Defendants. :

- - - - - X

17: CRIM 512

SEALED INDICTMENT

17 Cr. \_\_\_\_ ( )

COUNT ONE  
(Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about August 2016, up to and including in or about August 2017, in the Southern District of New York and elsewhere, GABRIEL GUILLEN, a/k/a "Toti," EDWARD JIMENEZ,

a/k/a "Buzzy," ZORAIDA RAMIREZ, WILSON GUILLEN, JOEL TAPIA, a/k/a "Emelio Vasquez," MATTHEW VASQUEZ, a/k/a "Cabeza," YEISON SALDANA, a/k/a "Jay," JASON LLANES, a/k/a "Jay Murder," GABRIEL CARRION, a/k/a "Gaby," MOISES SUERO, RICHARD JOSE, a/k/a "Kiki," JHOAN PICHARDO, a/k/a "Flaco," RAFAEL RODRIGUEZ, a/k/a "Rafi," and CARLOS PEREZ, a/k/a "Los," 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 GABRIEL GUILLEN, a/k/a "Toti," EDWARD JIMENEZ, a/k/a "Buzzy," ZORAIDA RAMIREZ, WILSON GUILLEN, JOEL TAPIA, a/k/a "Emelio Vasquez," MATTHEW VASQUEZ, a/k/a "Cabeza," YEISON SALDANA, a/k/a "Jay," JASON LLANES, a/k/a "Jay Murder," GABRIEL CARRION, a/k/a "Gaby," MOISES SUERO, RICHARD JOSE, a/k/a "Kiki," JHOAN PICHARDO, a/k/a "Flaco," RAFAEL RODRIGUEZ, a/k/a "Rafi," and CARLOS PEREZ, a/k/a "Los," 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 substances that GABRIEL GUILLEN, a/k/a "Toti," EDWARD JIMENEZ, a/k/a "Buzzy," ZORAIDA RAMIREZ, WILSON GUILLEN, JOEL TAPIA, a/k/a "Emelio Vasquez," MATTHEW VASQUEZ, a/k/a "Cabeza," YEISON SALDANA, a/k/a "Jay," JASON

LLANES, a/k/a "Jay Murder," GABRIEL CARRION, a/k/a "Gaby," MOISES SUERO, RICHARD JOSE, a/k/a "Kiki," JHOAN PICHARDO, a/k/a "Flaco," RAFAEL RODRIGUEZ, a/k/a "Rafi," and CARLOS PEREZ, a/k/a "Los," the defendants, conspired to distribute and possess with intent to distribute were: (1) 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); (2) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (3) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A).

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

COUNT TWO  
(Use of Firearms)

The Grand Jury further charges:

4. From at least in or about August 2016, up to and including in or about August 2017, in the Southern District of New York, GABRIEL GUILLEN, a/k/a "Toti," EDWARD JIMENEZ, a/k/a "Buzzy," ZORAIDA RAMIREZ, WILSON GUILLEN, JOEL TAPIA, a/k/a "Emelio Vasquez," MATTHEW VASQUEZ, a/k/a "Cabeza," YEISON SALDANA, a/k/a "Jay," JASON LLANES, a/k/a "Jay Murder," GABRIEL CARRION,

a/k/a "Gaby," MOISES SUERO, RICHARD JOSE, a/k/a "Kiki," JHOAN PICHARDO, a/k/a "Flaco," RAFAEL RODRIGUEZ, a/k/a "Rafi," and CARLOS PEREZ, a/k/a "Los," 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 conspiracy to distribute cocaine, crack cocaine, and heroin, charged in Count One of this Indictment, knowingly did use and carry firearms, and, in furtherance of that crime, did possess firearms.

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

#### FORFEITURE ALLEGATION

5. As a result of committing the controlled substance offense charged in Count One of this Indictment, GABRIEL GUILLEN, a/k/a "Toti," EDWARD JIMENEZ, a/k/a "Buzzy," ZORAIDA RAMIREZ, WILSON GUILLEN, JOEL TAPIA, a/k/a "Emelio Vasquez," MATTHEW VASQUEZ, a/k/a "Cabeza," YEISON SALDANA, a/k/a "Jay," JASON LLANES, a/k/a "Jay Murder," GABRIEL CARRION, a/k/a "Gaby," MOISES SUERO, RICHARD JOSE, a/k/a "Kiki," JHOAN PICHARDO, a/k/a "Flaco," RAFAEL RODRIGUEZ, a/k/a "Rafi," and CARLOS PEREZ, a/k/a "Los," 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 the 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 the 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.

SUBSTITUTE ASSETS PROVISION

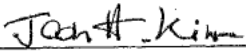
6. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- 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 21 U.S.C. § 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

  
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JOON H. KIM MS  
Acting United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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CARLOS PEREZ, a/k/a "Los,"

Defendants.

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SEALED INDICTMENT


17 Cr. \_\_\_\_ ( )

(21 U.S.C. §§ 846 and 841; 18 U.S.C.  
§§ 924(c) and 2)

JOON H. KIM

Acting United States Attorney.

A TRUE BILL

  
Foreperson.

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