

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

AMIN HERNANDEZ, :
a/k/a "Face," :

MIGUEL GIL, : 18 Cr.

JORALBI LORA, :

a/k/a "K," :

ISMAEL GARCIA, :

a/k/a "Swiss," and :

FRANCISCO TIBULCIOMERINO, :

a/k/a "Cousin," :

Defendants. :

- - - - - X

SEALED
INDICTMENT

18 CRIM 031

COUNT ONE

NARCOTICS CONSPIRACY

The Grand Jury charges:

1. In or about 2017, in the Southern District of New York and elsewhere, AMIN HERNANDEZ, a/k/a "Face," MIGUEL GIL, JORALBI LORA, a/k/a "K," ISMAEL GARCIA, a/k/a "Swiss," and FRANCISCO TIBULCIOMERINO, a/k/a "Cousin," 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 AMIN HERNANDEZ, a/k/a "Face," MIGUEL GIL, JORALBI LORA, a/k/a "K,"

ISMAEL GARCIA, a/k/a "Swiss," and FRANCISCO TIBULCIOMERINO, a/k/a "Cousin," 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 AMIN HERNANDEZ, a/k/a "Face," MIGUEL GIL, JORALBI LORA, a/k/a "K," ISMAEL GARCIA, a/k/a "Swiss," and FRANCISCO TIBULCIOMERINO, a/k/a "Cousin," the defendants, conspired to distribute and possess with intent to distribute were: (1) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack" cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A); (2) 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)(A); (3) a quantity of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C); (4) a quantity of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C); (5) a quantity of mixtures and substances containing a detectable amount of acetyl fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (6) a quantity of mixtures and substances containing a

detectable amount of oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C); (4)

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

FORFEITURE ALLEGATION

4. As a result of committing the controlled substance offense alleged in Count One of this Indictment, AMIN HERNANDEZ, a/k/a "Face," MIGUEL GIL, JORALBI LORA, a/k/a "K," ISMAEL GARCIA, a/k/a "Swiss," and FRANCISCO TIBULCIOMERINO, a/k/a "Cousin," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendants obtained directly or indirectly as a result of the violation alleged in Count One of this Indictment and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of said violation, including, but not limited to, a sum in United States currency representing the amount of all proceeds obtained as a result of the controlled substance offense alleged in Count One of the Indictment.

Substitute Asset Provision

5. If any of the property described above as being subject to forfeiture, 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 intention 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

A handwritten signature in cursive script, reading "Geoffrey S. Berman".

GEOFFREY S. BERMAN
United States Attorney

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GIL, JORALBI LORA, a/k/a "K," ISMAEL
GARCIA, a/k/a "Swiss," and FRANCISCO
TIBULCIOMERINO, a/k/a "Cousin,"

Defendants.

SEALED INDICTMENT

18 Cr.

(21 U.S.C. 846.)

GEOFFREY S. BERMAN
United States Attorney.

A TRUE BILL


Foreperson.
