

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
UNITED STATES OF AMERICA :
 :
 - v. - :
 :
 ADALBERTO VELAZQUEZ, :
 a/k/a "Joe," :
 RAYMOND RESTO, :
 a/k/a "Tone," :
 SAL CASTRO, :
 a/k/a "Floss," :
 JOEL LOPEZ, :
 a/k/a "Rompiendoe," :
 a/k/a "Paul," :
 a/k/a "Po," :
 WILLIS LLERAS, :
 a/k/a "Willy," :
 REINALDO ROMAN, :
 a/k/a "Papo," :
 JAIME GARCIA, :
 a/k/a "Jimmy," :
 ANTONIO BURGOS, :
 a/k/a "Anthony," and :
 MARILYN ADINO, :
 Defendants. :
- - - - - X

SEALED INDICTMENT

19 Cr.

19 CRIM 116

COUNT ONE

The Grand Jury charges:

OVERVIEW OF THE CONSPIRACY

1. The Velazquez Drug Trafficking Organization (the "DTO") consists of a group of individuals who are engaged in

heroin, fentanyl, and cocaine trafficking in the Bronx, New York. From at least in or about 2015, up to and including in or about February 2019, in the Southern District of New York and elsewhere, ADALBERTO VELAZQUEZ, a/k/a "Joe," RAYMOND RESTO, a/k/a "Tone," SAL CASTRO, a/k/a "Floss," JOEL LOPEZ, a/k/a "Rompiendoe," a/k/a "Paul," a/k/a "Po," WILLIS LLERAS, a/k/a "Willy," REINALDO ROMAN, a/k/a "Papo," JAIME GARCIA, a/k/a "Jimmy," ANTONIO BURGOS, a/k/a "Anthony," and MARILYN ADINO, the defendants (collectively, the "Defendants"), all of whom were members of the DTO, and others known and unknown, conspired to distribute heroin, fentanyl, and cocaine. Over the course of the conspiracy, the DTO is estimated to have distributed hundreds of kilograms of cocaine and heroin. Much of the heroin that the DTO distributed was mixed with fentanyl.

2. The DTO packaged and sold narcotics out of multiple auto body shops and garages in the Bronx, New York. As a means of marketing its heroin, the DTO placed "stamps" on the glassines of heroin and fentanyl that it sold to customers.

3. Members of the DTO fulfilled different roles within the DTO. Among other roles, certain of the Defendants provided wholesale supplies of drugs; other of the Defendants supervised the preparation and packaging of these drugs into retail distribution packages; other of the Defendants managed the distribution of retail packages of drugs to the street-level

sellers; and other of the Defendants sold drugs to retail customers in hand-to-hand transactions.

4. ADALBERTO VELAZQUEZ, a/k/a "Joe," the defendant, received his supply of cocaine, heroin, and fentanyl from various individuals, including RAYMOND RESTO, a/k/a "Tone," SAL CASTRO, a/k/a "Floss," and JOEL LOPEZ, a/k/a "Rompiendoe," a/k/a "Paul," a/k/a "Po," the defendants. WILLIS LLERAS, a/k/a "Willy," the defendant, was responsible for processing and packaging these drugs. VELAZQUEZ and LLERA then delivered the drugs to the DTO's dealers, including REINALDO ROMAN, a/k/a "Papo," JAIME GARCIA, a/k/a "Jimmy," ANTONIO BURGOS, a/k/a "Anthony," and MARILYN ADINO, the defendants.

STATUTORY ALLEGATIONS

5. From at least in or about 2015, up to and including in or about February 2019, in the Southern District of New York and elsewhere, ADALBERTO VELAZQUEZ, a/k/a "Joe," RAYMOND RESTO, a/k/a "Tone," SAL CASTRO, a/k/a "Floss," JOEL LOPEZ, a/k/a "Rompiendoe," a/k/a "Paul," a/k/a "Po," WILLIS LLERAS, a/k/a "Willy," REINALDO ROMAN, a/k/a "Papo," JAIME GARCIA, a/k/a "Jimmy," ANTONIO BURGOS, a/k/a "Anthony," and MARILYN ADINO, 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.

6. It was a part and an object of the conspiracy that ADALBERTO VELAZQUEZ, a/k/a "Joe," RAYMOND RESTO, a/k/a "Tone," SAL CASTRO, a/k/a "Floss," JOEL LOPEZ, a/k/a "Rompiendoe," a/k/a "Paul," a/k/a "Po," WILLIS LLERAS, a/k/a "Willy," REINALDO ROMAN, a/k/a "Papo," JAIME GARCIA, a/k/a "Jimmy," ANTONIO BURGOS, a/k/a "Anthony," and MARILYN ADINO, 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).

7. The controlled substances that ADALBERTO VELAZQUEZ, a/k/a "Joe," RAYMOND RESTO, a/k/a "Tone," SAL CASTRO, a/k/a "Floss," JOEL LOPEZ, a/k/a "Rompiendoe," a/k/a "Paul," a/k/a "Po," WILLIS LLERAS, a/k/a "Willy," REINALDO ROMAN, a/k/a "Papo," JAIME GARCIA, a/k/a "Jimmy," ANTONIO BURGOS, a/k/a "Anthony," and MARILYN ADINO, 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); (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); and (iii) 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.)

FORFEITURE ALLEGATION

8. As a result of committing the controlled substance offense alleged in Count One of this Indictment, ADALBERTO VELAZQUEZ, a/k/a "Joe," RAYMOND RESTO, a/k/a "Tone," SAL CASTRO, a/k/a "Floss," JOEL LOPEZ, a/k/a "Rompiendoe," a/k/a "Paul," a/k/a "Po," WILLIS LLERAS, a/k/a "Willy," REINALDO ROMAN, a/k/a "Papo," JAIME GARCIA, a/k/a "Jimmy," ANTONIO BURGOS, a/k/a "Anthony," and MARILYN ADINO, 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.

Substitute Asset Provision

9. 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;

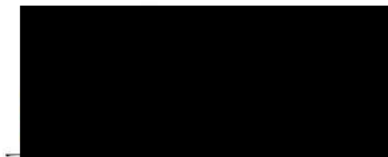
(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

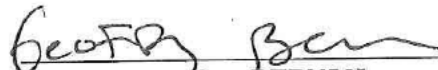
(e) has been commingled with other property which cannot be subdivided without difficulty;

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.)



FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

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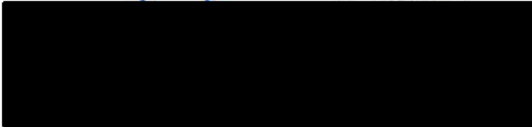
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(Title 21, United States Code, Section 846.)

GEOFFREY S. BERMAN
United States Attorney.

 A TRUE BILL

 Foreperson.
