

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MARIO REYNOSO-HICIANO,
JOEL CABRERA,
a/k/a "Gordo,"
a/k/a "Oso,"
VLADIMIR REYES,
YUDITH REYNOSO-HICIANO,
a/k/a "La Classica," and
PEDRO REYNOSO,

Defendants.

SEALED INDICTMENT

20 Cr.

COUNT ONE

(Narcotics Conspiracy)

The Grand Jury charges:

1. In or about May 2019, in the Southern District of New York and elsewhere, MARIO REYNOSO-HICIANO, JOEL CABRERA, a/k/a "Gordo," a/k/a "Oso," and VLADIMIR REYES, 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 MARIO REYNOSO-HICIANO, JOEL CABRERA, a/k/a "Gordo," a/k/a "Oso," and VLADIMIR REYES, 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 substance that MARIO REYNOSO-HICIANO, JOEL CABRERA, a/k/a "Gordo," a/k/a "Oso," and VLADIMIR REYES, the defendants, conspired to distribute and possess with intent to distribute was 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).

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

COUNT TWO
(Kidnapping Conspiracy)

The Grand Jury further charges:

4. From on or about May 30, 2019, up to and including on or about May 31, 2019, in the Southern District of New York and elsewhere, MARIO REYNOSO-HICIANO, YUDITH REYNOSO-HICIANO, a/k/a "La Classica," and PEDRO REYNOSO, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1201(a)(1).

5. It was a part and an object of the conspiracy that MARIO REYNOSO-HICIANO, YUDITH REYNOSO-HICIANO, a/k/a "La Classica," and PEDRO REYNOSO, the defendants, 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 ("Victim-1"), and in committing the offense and in furtherance of the commission of the offense did willfully transport Victim-1 in interstate commerce, travel in interstate commerce, and use a means, facility, and instrumentality of interstate and foreign commerce, in violation of Title 18, United States Code, Section 1201(a)(1).

Overt Acts

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

a. From on or about May 30, 2019, up to and including on or about May 31, 2019, YUDITH REYNOSO-HICIANO, a/k/a "La Classica," the defendant, used a cellphone to record Victim-1 inside a particular residence in the Bronx, New York (the "Residence") discussing a cocaine transaction (the "Cocaine Transaction") in which an associate of Victim-1 had received cocaine from MARIO REYNOSO-HICIANO, the defendant, but paid less than the full negotiated purchase price for the cocaine.

b. From on or about May 30, 2019, up to and including on

or about May 31, 2019, MARIO REYNOSO-HICIANO and PEDRO REYNOSO, the defendants, demanded that Victim-1 provide information relating to the Cocaine Transaction, and threatened to and did physically assault Victim-1 to coerce Victim-1 to provide such information.

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

COUNT THREE

(Kidnapping)

The Grand Jury further charges:

7. From on or about May 30, 2019, up to and including on or about May 31, 2019, in the Southern District of New York and elsewhere, MARIO REYNOSO-HICIANO, YUDITH REYNOSO-HICIANO, a/k/a "La Classica," and PEDRO REYNOSO, the defendants, unlawfully and knowingly seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away and held for ransom and reward and otherwise Victim-1, and in committing the offense and in furtherance of the commission of the offense did willfully cause Victim-1 to be transported in interstate commerce, traveled in interstate commerce, and used a means, facility, and instrumentality of interstate commerce, and aided, abetted, and attempted the same, to wit, MARIO REYNOSO-HICIANO, YUDITH REYNOSO-HICIANO, and PEDRO REYNOSO used a cellphone to cause Victim-1 to travel to and enter the Residence, tied Victim-1 to a chair, threatened to and did physically assault Victim-1,

demanded that Victim-1 provide information relating to the Cocaine Transaction, and filmed with a cellphone Victim-1 discussing the Cocaine Transaction.

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

COUNT FOUR
(Firearms Offense)

The Grand Jury further charges:

8. On or about May 31, 2019, in the Southern District of New York and elsewhere, JOEL CABRERA, a/k/a "Gordo," a/k/a "Oso," 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, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which firearm was brandished and discharged.

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

FORFEITURE ALLEGATIONS

9. As a result of committing the controlled substance offense alleged in Count One of this Indictment, MARIO REYNOSO-HICIANO, JOEL CABRERA, a/k/a "Gordo," a/k/a "Oso," and VLADIMIR REYES, 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.

10. As a result of committing the kidnapping offenses alleged in Counts Two and Three of this Indictment, MARIO REYNOSO-HICIANO, YUDITH REYNOSO-HICIANO, a/k/a "La Classica," and PEDRO REYNOSO, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.


Substitute Asset Provision

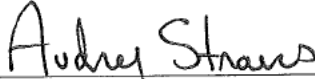
11. If any of the above described forfeitable property, as a result of any act or omission of the defendants:

- (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 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461(c).)


Foreperson



AUDREY STRAUSS
Acting United States Attorney

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

AUDREY STRAUSS

Acting United States Attorney


Foreperson