

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

PEDRO GUZMAN MARTINEZ,  
a/k/a "Peter,"  
ABEL MONTILLA,  
a/k/a "Coche Bomba,"  
JORGE MIRANDA-SANG,  
a/k/a "Chinito," and  
LUIS GOMEZ ORTIZ,  
a/k/a "Kiké,"

Defendants.

**SEALED**  
**SUPERSEDING**  
**INDICTMENT**

S9 19 Cr. 536 (PKC)

**COUNT ONE**  
**(Narcotics Conspiracy)**

The Grand Jury charges:

**OVERVIEW**

1. From at least in or about September 2018, up to and including at least in or about June 2019, in the Southern District of New York and elsewhere, PEDRO GUZMAN MARTINEZ, a/k/a "Peter," ABEL MONTILLA, a/k/a "Coche Bomba," JORGE MIRANDA-SANG, a/k/a "Chinito," and LUIS GOMEZ ORTIZ, a/k/a "Kiké," the defendants, were members of a drug-trafficking organization (the "DTO") that was responsible for shipping large quantities of cocaine from Puerto Rico to certain locations in the continental United States, including in New York, Massachusetts, Florida, and Connecticut, for sale and distribution.

2. The DTO shipped cargo that purportedly contained custom furniture, in which furniture the DTO concealed kilogram-quantities of cocaine. Between at least in or about September 2018 and in or about June 2019, the defendants were responsible for distributing approximately 4,500 kilograms of the DTO's cocaine throughout the continental United States.

3. PEDRO GUZMAN MARTINEZ, a/k/a "Peter," the defendant, was responsible for delivering the packaged cargo (containing hollowed-out furniture filled with cocaine) to co-conspirators whom GUZMAN MARTINEZ hired to facilitate the shipping logistics.

4. JORGE MIRANDA-SANG, a/k/a "Chinito," and LUIS GOMEZ ORTIZ, a/k/a "Kiké," the defendants, identified and hired individuals in the continental United States to receive and sign for DTO shipments and to unpack the DTO cocaine, distribute the cocaine to other DTO members as directed, and dispose of the packaging materials.

5. ABEL MONTILLA, a/k/a "Coche Bomba," the defendant, a Massachusetts-based coordinator of DTO deliveries, traveled to many DTO delivery locations and coordinated the delivery of cocaine shipments with DTO package recipients. At least a dozen DTO packages were sent to addresses affiliated with MONTILLA.

### STATUTORY ALLEGATIONS

6. From at least in or about September 2018, up to and including at least in or about June 2019, in the Southern District of New York and elsewhere, PEDRO GUZMAN MARTINEZ, a/k/a "Peter," ABEL MONTILLA, a/k/a "Coche Bomba," JORGE MIRANDA-SANG, a/k/a "Chinito," and LUIS GOMEZ ORTIZ, a/k/a "Kiké," 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.

7. It was a part and an object of the conspiracy that PEDRO GUZMAN MARTINEZ, a/k/a "Peter," ABEL MONTILLA, a/k/a "Coche Bomba," JORGE MIRANDA-SANG, a/k/a "Chinito," and LUIS GOMEZ ORTIZ, a/k/a "Kiké," 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).

8. The controlled substance that PEDRO GUZMAN MARTINEZ, a/k/a "Peter," ABEL MONTILLA, a/k/a "Coche Bomba," JORGE MIRANDA-SANG, a/k/a "Chinito," and LUIS GOMEZ ORTIZ, a/k/a "Kiké," the defendants, conspired to distribute and possess with intent to distribute was 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**

9. As a result of committing the controlled substance offense alleged in Count One of this Indictment, PEDRO GUZMAN MARTINEZ, a/k/a "Peter," ABEL MONTILLA, a/k/a "Coche Bomba," JORGE MIRANDA-SANG, a/k/a "Chinito," and LUIS GOMEZ ORTIZ, a/k/a "Kiké," 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 ASSETS PROVISION**

10. 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 defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)



FOREPERSON

Audrey Strauss/JNM  
AUDREY STRAUSS  
United States Attorney

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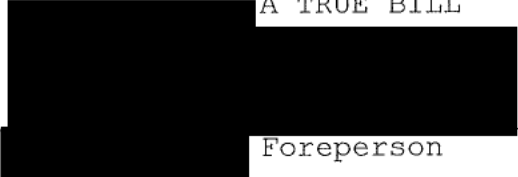
S9 19 Cr. 536 (PKC)

(21 U.S.C. § 846)

AUDREY STRAUSS  
United States Attorney

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A TRUE BILL

  
Foreperson

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