



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

November 2, 2021

**BY ECF**

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: *United States v. Aponte-Guzman, et al.*, 21 Cr. 661 (AJN)

Dear Judge Nathan:

Yesterday, a Grand Jury returned Indictment 21 Cr. 661, which charges Jorge Aponte-Guzman, Nelson Agramonte-Minaya, and Carlos Maisonet-Lopez with one count of conspiracy to distribute and possess with intent to distribute five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A). The matter was assigned to the Court. The Government respectfully submits this letter to provide some background in advance of an initial pretrial conference.

**Procedural Background**

On or about September 29, 2021, the defendants were arrested by law enforcement officers in connection with the conduct described below. The defendants were charged by Complaint 21 Mag. 9445, which was signed by the Honorable Gabriel W. Gorenstein on or about September 30, 2021. Also on or about September 30, 2021, defendants Nelson Agramonte-Minaya and Carlos Maisonet-Lopez were presented before Judge Gorenstein. Agramonte-Minaya was ordered detained, and Maisonet-Lopez was ordered released on conditions. That day, the U.S. Marshals Service determined that defendant Jorge Aponte-Guzman required a "fit for confinement" letter before being presented, and he was not able to obtain such a letter in time to be presented that day. Accordingly, he was presented before Judge Gorenstein the next day, on or about October 1, 2021, and was detained on consent without prejudice to a future application.

**Offense Summary**

On or about September 29, 2021, law enforcement officers, who were on the lookout for a particular rental van, observed the van in New Jersey. Officers observed defendant Jorge Aponte-Guzman drive the van to a loading dock in New Jersey and then drive the van to an apparently abandoned lot next to a multiunit residence in New Jersey. Officers observed defendant Carlos Maisonet-Lopez approach the van on foot.

November 2, 2021

Page 2

Law enforcement officers eventually moved in on the van. As they did so, they observed defendant Nelson Agramonte-Minaya standing in the vicinity of the basement-level unit of the residence. Inside the van, officers observed shipping pallets, as well as a record suggesting that those pallets contained lawn rollers shipped from Puerto Rico with a consignee address in the Bronx, New York. Agents searched the basement-level unit of the residence and observed that it appeared to be outfitted for unpacking the lawn rollers: There were power tools, furniture was covered in plastic, and windows were covered up.

Law enforcement officers cut open the ten lawn rollers that were in the van and seized a total of 460 kilograms of cocaine. The following day, on or about September 30, 2021, law enforcement officers returned to the loading dock that Aponte-Guzman had visited the day before. Individuals at the loading dock informed the officers that the loading dock had received a second shipment that was materially similar to the one law enforcement had seized the day before: ten lawn rollers from the same address in Puerto Rico with the same consignee address in the Bronx. Officers opened those rollers and seized an additional 460 kilograms of cocaine.

**Proposed Schedule**

The Government will begin producing discovery by November 9, 2021 and will confer with defense counsel in advance of the initial pretrial conference regarding a proposed schedule for the filing of any motions.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By: Samuel P. Rothschild  
Samuel P. Rothschild  
Assistant United States Attorney  
(212) 637-2504

cc (by ECF): Sylvie Levine, Esq.  
Jeffrey Pittell, Esq.  
Michael Bradley, Esq.