

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

EDWIN ROMERO,
 a/k/a "Yones,"
 a/k/a "Yoni,"
RAFAEL ROMERO,
 a/k/a "Kodi,"
FRANCIS PALUZZI,
 a/k/a "Fetty,"
LUIS GONZALEZ,
 a/k/a "Tili,"
 a/k/a "Bori,"
ANIBAL GONZALEZ,
 a/k/a "Foli,"
CARLOS MOTA,
 a/k/a "Culebra,"
 a/k/a "Snake,"
ELIMANUEL DIAZ,
 a/k/a "Lima,"
PEDRO OLIVO,
 a/k/a "Pito,"
ADRIAN SANCHEZ,
 a/k/a "Pachi,"
DARYL SIMON,
 a/k/a "D-Money,"
JEFFREY FERNANDEZ,
 a/k/a "Jefe,"
JUAN VALDEZ,
 a/k/a "Sito,"
WILLIE TUCKER,
 a/k/a "Big Will,"
 a/k/a "BJ,"
 a/k/a "BG,"
KASAN NOBLE,
 a/k/a "Kay Kay,"
DAMIAN SAUNDERS,
 a/k/a "Floss,"
DANIEL JEFFERSON,
 a/k/a "Ace,"
DERECK JEFFERSON,
 a/k/a "Bang,"
WAYNE SCOTT,
 a/k/a "Punch,"

SEALED
SUPERSEDING INDICTMENT

S1 17 Cr. 123 (LAP)

ERIC RIVERA,	:
a/k/a "Chucky,"	:
a/k/a "Chuck Dollarz,"	:
MICHAEL MARTINEZ,	:
MAXAMILLION MERCADO,	:
a/k/a "Bully,"	:
KAREEM SIMMONDS,	:
a/k/a "Kareem Simmons,"	:
a/k/a "Black,"	:
ALEXANDER PENA,	:
a/k/a "Green Eyes,"	:
ANTHONY CLASE,	:
a/k/a "Ant,"	:
CARLOS ACOSTA,	:
a/k/a "Greg,"	:
CHRISTOPHER RODRIGUEZ,	:
a/k/a "Dread,"	:
GABRIEL GONZALEZ,	:
a/k/a "Gabi,"	:
a/k/a "Baldy,"	:
JESUS MATA,	:
a/k/a "Junior,"	:
a/k/a "Jay,"	:
NANA OWUSU,	:
a/k/a "Africa,"	:
ROBERTO RAMIREZ,	:
WILPHER RODRIGUEZ,	:
YAWILIS RODRIGUEZ,	:
a/k/a "Will,"	:
JESUS ABAD,	:
a/k/a "Rojo," and	:
ANGEL GUANCE,	:
a/k/a "Chico,"	:
a/k/a "All In,"	:
	:
Defendants.	:
	:
-----	X

COUNT ONE
(Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about 2010 up to and including at least in or about March 2017, in the Southern

District of New York and elsewhere, EDWIN ROMERO, a/k/a "Yones," a/k/a "Yoni," RAFAEL ROMERO, a/k/a "Kodi," FRANCIS PALUZZI, a/k/a "Fetty," LUIS GONZALEZ, a/k/a "Tili," a/k/a "Bori," ANIBAL GONZALEZ, a/k/a "Foli," CARLOS MOTA, a/k/a "Culebra," a/k/a "Snake," ELIMANUEL DIAZ, a/k/a "Lima," PEDRO OLIVO, a/k/a "Pito," ADRIAN SANCHEZ, a/k/a "Pachi," DARYL SIMON, a/k/a "D-Money," JEFFREY FERNANDEZ, a/k/a "Jefe," JUAN VALDEZ, a/k/a "Sito," WILLIE TUCKER, a/k/a "Big Will," a/k/a "BJ," a/k/a "BG," KASAN NOBLE, a/k/a "Kay Kay," DAMIAN SAUNDERS, a/k/a "Floss," DANIEL JEFFERSON, a/k/a "Ace," DERECK JEFFERSON, a/k/a "Bang," WAYNE SCOTT, a/k/a "Punch," ERIC RIVERA, a/k/a "Chucky," a/k/a "Chuck Dollarz," MICHAEL MARTINEZ, MAXAMILLION MERCADO, a/k/a "Bully," KAREEM SIMMONDS, a/k/a "Kareem Simmons," a/k/a "Black," ALEXANDER PENA, a/k/a "Green Eyes," ANTHONY CLASE, a/k/a "Ant," CARLOS ACOSTA, a/k/a "Greg," CHRISTOPHER RODRIGUEZ, a/k/a "Dread," GABRIEL GONZALEZ, a/k/a "Gabi," a/k/a "Baldy," JESUS MATA, a/k/a "Junior," a/k/a "Jay," NANA OWUSU, a/k/a "Africa," ROBERTO RAMIREZ, WILPHER RODRIGUEZ, YAWILIS RODRIGUEZ, a/k/a "Will," JESUS ABAD, a/k/a "Rojo," ANGEL GUANCE, a/k/a "Chico," a/k/a "All In," 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 EDWIN ROMERO, a/k/a "Yones," a/k/a "Yoni," RAFAEL ROMERO, a/k/a "Kodi," FRANCIS PALUZZI, a/k/a "Fetty," LUIS GONZALEZ, a/k/a "Tili," a/k/a "Bori," ANIBAL GONZALEZ, a/k/a "Foli," CARLOS MOTA, a/k/a "Culebra," a/k/a "Snake," ELIMANUEL DIAZ, a/k/a "Lima," PEDRO OLIVO, a/k/a "Pito," ADRIAN SANCHEZ, a/k/a "Pachi," DARYL SIMON, a/k/a "D-Money," JEFFREY FERNANDEZ, a/k/a "Jefe," JUAN VALDEZ, a/k/a "Sito," WILLIE TUCKER, a/k/a "Big Will," a/k/a "BJ," a/k/a "BG," KASAN NOBLE, a/k/a "Kay Kay," DAMIAN SAUNDERS, a/k/a "Floss," DANIEL JEFFERSON, a/k/a "Ace," DERECK JEFFERSON, a/k/a "Bang," WAYNE SCOTT, a/k/a "Punch," ERIC RIVERA, a/k/a "Chucky," a/k/a "Chuck Dollarz," MICHAEL MARTINEZ, MAXAMILLION MERCADO, a/k/a "Bully," KAREEM SIMMONDS, a/k/a "Kareem Simmons," a/k/a "Black," ALEXANDER PENA, a/k/a "Green Eyes," ANTHONY CLASE, a/k/a "Ant," CARLOS ACOSTA, a/k/a "Greg," CHRISTOPHER RODRIGUEZ, a/k/a "Dread," GABRIEL GONZALEZ, a/k/a "Gabi," a/k/a "Baldy," JESUS MATA, a/k/a "Junior," a/k/a "Jay," NANA OWUSU, a/k/a "Africa," ROBERTO RAMIREZ, WILPHER RODRIGUEZ, YAWILIS RODRIGUEZ, a/k/a "Will," JESUS ABAD, a/k/a "Rojo," ANGEL GUANCE, a/k/a "Chico," a/k/a "All In," 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 EDWIN ROMERO, a/k/a "Yones," a/k/a "Yoni," RAFAEL ROMERO, a/k/a "Kodi," FRANCIS PALUZZI, a/k/a "Fetty," LUIS GONZALEZ, a/k/a "Tili," a/k/a "Bori," ANIBAL GONZALEZ, a/k/a "Foli," CARLOS MOTA, a/k/a "Culebra," a/k/a "Snake," ELIMANUEL DIAZ, a/k/a "Lima," PEDRO OLIVO, a/k/a "Pito," ADRIAN SANCHEZ, a/k/a "Pachi," DARYL SIMON, a/k/a "D-Money," JEFFREY FERNANDEZ, a/k/a "Jefe," JUAN VALDEZ, a/k/a "Sito," WILLIE TUCKER, a/k/a "Big Will," a/k/a "BJ," a/k/a "BG," KASAN NOBLE, a/k/a "Kay Kay," DAMIAN SAUNDERS, a/k/a "Floss," DANIEL JEFFERSON, a/k/a "Ace," DERECK JEFFERSON, a/k/a "Bang," WAYNE SCOTT, a/k/a "Punch," ERIC RIVERA, a/k/a "Chucky," a/k/a "Chuck Dollarz," MICHAEL MARTINEZ, MAXAMILLION MERCADO, a/k/a "Bully," KAREEM SIMMONDS, a/k/a "Kareem Simmons," a/k/a "Black," ALEXANDER PENA, a/k/a "Green Eyes," ANTHONY CLASE, a/k/a "Ant," CARLOS ACOSTA, a/k/a "Greg," CHRISTOPHER RODRIGUEZ, a/k/a "Dread," GABRIEL GONZALEZ, a/k/a "Gabi," a/k/a "Baldy," JESUS MATA, a/k/a "Junior," a/k/a "Jay," NANA OWUSU, a/k/a "Africa," ROBERTO RAMIREZ, WILPHER RODRIGUEZ, YAWILIS RODRIGUEZ, a/k/a "Will," JESUS ABAD, a/k/a "Rojo," ANGEL GUANCE, a/k/a "Chico," a/k/a "All In," the defendants, conspired to distribute were: (1) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(A); (2) a quantity of cocaine, in violation of Title 21, United States

Code, Section 841(b) (1) (C); (3) a quantity of heroin, in violation of Title 21, United States Code, Section 841(b) (1) (C); and (4) a quantity of marijuana, in violation of Title 21, United States Code, Section 841(b) (1) (D).

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

COUNT TWO
(Hobbs Act Robbery Conspiracy)

The Grand Jury further charges:

4. From at least in or about 2010 up to and including at least in or about 2016, in the Southern District of New York, EDWIN ROMERO, a/k/a "Yones," a/k/a "Yoni," ADRIAN SANCHEZ, a/k/a "Pachi," JUAN VALDEZ, a/k/a "Sito," WILLIE TUCKER, a/k/a "Big Will," a/k/a "BJ," a/k/a "BG," YAWILIS RODRIGUEZ, a/k/a "Will," the defendants, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b) (1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b) (3).

(Title 18, United States Code, Section 1951.)

COUNT THREE

(Firearms Offenses in Relation to Narcotics Conspiracy)

The Grand Jury further charges:

5. From at least in or about 2010 up to and including at least in or about March 2017, in the Southern District of New York and elsewhere, EDWIN ROMERO, a/k/a "Yones," a/k/a "Yoni," RAFAEL ROMERO, a/k/a "Kodi," FRANCIS PALUZZI, a/k/a "Fetty," LUIS GONZALEZ, a/k/a "Tili," a/k/a "Bori," ANIBAL GONZALEZ, a/k/a "Foli," CARLOS MOTA, a/k/a "Culebra," a/k/a "Snake," ELIMANUEL DIAZ, a/k/a "Lima," PEDRO OLIVO, a/k/a "Pito," ADRIAN SANCHEZ, a/k/a "Pachi," DARYL SIMON, a/k/a "D-Money," JEFFREY FERNANDEZ, a/k/a "Jefe," JUAN VALDEZ, a/k/a "Sito," WILLIE TUCKER, a/k/a "Big Will," a/k/a "BJ," a/k/a "BG," KASAN NOBLE, a/k/a "Kay Kay," DAMIAN SAUNDERS, a/k/a "Floss," DANIEL JEFFERSON, a/k/a "Ace," DERECK JEFFERSON, a/k/a "Bang," WAYNE SCOTT, a/k/a "Punch," ERIC RIVERA, a/k/a "Chucky," a/k/a "Chuck Dollarz," MICHAEL MARTINEZ, KAREEM SIMMONDS, a/k/a "Kareem Simmons," a/k/a "Black," ALEXANDER PENA, a/k/a "Green Eyes," ANTHONY CLASE, a/k/a "Ant," CARLOS ACOSTA, a/k/a "Greg," CHRISTOPHER RODRIGUEZ, a/k/a "Dread," GABRIEL GONZALEZ, a/k/a "Gabi," a/k/a "Baldy," JESUS MATA, a/k/a "Junior," a/k/a "Jay," NANA OWUSU, a/k/a "Africa," ROBERTO RAMIREZ, WILPHER RODRIGUEZ, YAWILIS RODRIGUEZ, a/k/a "Will," JESUS ABAD, a/k/a "Rojo," ANGEL GUANCE, a/k/a "Chico," a/k/a "All In," the defendants, knowingly, during and in relation to a drug trafficking crime

for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment, did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, numerous of which were brandished and discharged.

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

COUNT FOUR

(Firearms Offenses in Relation to Robbery Conspiracy)

The Grand Jury further charges:

6. From at least in or about 2010 up to and including at least in or about March 2017, in the Southern District of New York and elsewhere, EDWIN ROMERO, a/k/a "Yones," a/k/a "Yoni," the defendant, knowingly, during and in relation to a crime of violence, namely, the robbery conspiracy charged in Count Two of this Indictment, did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, some of which were brandished and discharged.

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

FORFEITURE ALLEGATION

7. As a result of committing the controlled substance offense alleged in Count One of this Indictment, EDWIN ROMERO,

a/k/a "Yones," a/k/a "Yoni," RAFAEL ROMERO, a/k/a "Kodi," FRANCIS PALUZZI, a/k/a "Fetty," LUIS GONZALEZ, a/k/a "Tili," a/k/a "Bori," ANIBAL GONZALEZ, a/k/a "Foli," CARLOS MOTA, a/k/a "Culebra," a/k/a "Snake," ELIMANUEL DIAZ, a/k/a "Lima," PEDRO OLIVO, a/k/a "Pito," ADRIAN SANCHEZ, a/k/a "Pachi," DARYL SIMON, a/k/a "D-Money," JEFFREY FERNANDEZ, a/k/a "Jefe," JUAN VALDEZ, a/k/a "Sito," WILLIE TUCKER, a/k/a "Big Will," a/k/a "BJ," a/k/a "BG," KASAN NOBLE, a/k/a "Kay Kay," DAMIAN SAUNDERS, a/k/a "Floss," DANIEL JEFFERSON, a/k/a "Ace," DERECK JEFFERSON, a/k/a "Bang," WAYNE SCOTT, a/k/a "Punch," ERIC RIVERA, a/k/a "Chucky," a/k/a "Chuck Dollarz," MICHAEL MARTINEZ, MAXAMILLION MERCADO, a/k/a "Bully," KAREEM SIMMONDS, a/k/a "Kareem Simmons," a/k/a "Black," ALEXANDER PENA, a/k/a "Green Eyes," ANTHONY CLASE, a/k/a "Ant," CARLOS ACOSTA, a/k/a "Greg," CHRISTOPHER RODRIGUEZ, a/k/a "Dread," GABRIEL GONZALEZ, a/k/a "Gabi," a/k/a "Baldy," JESUS MATA, a/k/a "Junior," a/k/a "Jay," NANA OWUSU, a/k/a "Africa," ROBERTO RAMIREZ, WILPHER RODRIGUEZ, YAWILIS RODRIGUEZ, a/k/a "Will," JESUS ABAD, a/k/a "Rojo," ANGEL GUANCE, a/k/a "Chico," a/k/a "All In," 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.

8. As a result of committing the robbery offense alleged in Count Two of this Indictment, EDWIN ROMERO, a/k/a "Yones," a/k/a "Yoni," ADRIAN SANCHEZ, a/k/a "Pachi," JUAN VALDEZ, a/k/a "Sito," WILLIE TUCKER, a/k/a "Big Will," a/k/a "BJ," a/k/a "BG," YAWILIS RODRIGUEZ, a/k/a "Will," 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 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 each defendant 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.)


FOREPERSON


PREET BHARARA *MSH*
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

EDWIN ROMERO, a/k/a "Yones," a/k/a "Yoni," RAFAEL ROMERO, a/k/a "Kodi," FRANCIS PALUZZI, a/k/a "Fetty," LUIS GONZALEZ, a/k/a "Tili," a/k/a "Bori," ANIBAL GONZALEZ, a/k/a "Foli," CARLOS MOTA, a/k/a "Culebra," a/k/a "Snake," ELIMANUEL DIAZ, a/k/a "Lima," PEDRO OLIVO, a/k/a "Pito," ADRIAN SANCHEZ, a/k/a "Pachi," DARYL SIMON, a/k/a "D-Money," JEFFREY FERNANDEZ, a/k/a "Jefe," JUAN VALDEZ, a/k/a "Sito," WILLIE TUCKER, a/k/a "Big Will," a/k/a "BJ," a/k/a "BG," KASAN NOBLE, a/k/a "Kay Kay," DAMIAN SAUNDERS, a/k/a "Floss," DANIEL JEFFERSON, a/k/a "Ace," DERECK JEFFERSON, a/k/a "Bang," WAYNE SCOTT, a/k/a "Punch," ERIC RIVERA, a/k/a "Chucky," a/k/a "Chuck Dollarz," MICHAEL MARTINEZ, MAXAMILLION MERCADO, a/k/a "Bully," KAREEM SIMMONDS, a/k/a "Kareem Simmons," a/k/a "Black," ALEXANDER PENA, a/k/a "Green Eyes," ANTHONY CLASE, a/k/a "Ant," CARLOS ACOSTA, a/k/a "Greg," CHRISTOPHER RODRIGUEZ, a/k/a "Dread," GABRIEL GONZALEZ, a/k/a "Gabi," a/k/a "Baldy," JESUS MATA, a/k/a "Junior," a/k/a "Jay," NANA OWUSU, a/k/a "Africa," ROBERTO RAMIREZ, WILPHER RODRIGUEZ, YAWILIS RODRIGUEZ, a/k/a "Will," JESUS ABAD, a/k/a "Rojo," and ANGEL GUANCE, a/k/a "Chico," a/k/a "All In,"

Defendants.

SEALED SUPERSEDING INDICTMENT

S1 17 Cr. 123 (LAP)

(Title 21, United States Code,
Section 846; Title 18, United States Code, Sections 1951,
924(c)(1)(A)(i), (ii), and (iii), and 2.)

PREET BHARARA

United States Attorney.

A) TRUE BILL

Foreperson.
