

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
- v. - : **INDICTMENT**
:
LUIGI JAQUEZ, : 17 Cr. ()
KARILIE HERRERA, : **17 CRIM 415**
a/k/a "Choco," :
a/k/a "Choco Black," and :
SACHA SANTIAGO, :
:
Defendants. :
:
----- X

COUNT ONE

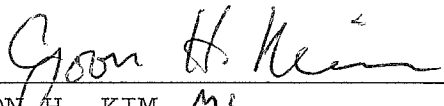
The Grand Jury charges:

1. On or about June 24, 2008, in the Southern District of New York and elsewhere, LUIGI JAQUEZ, KARILIE HERRERA, a/k/a "Choco," a/k/a "Choco Black," and SACHA SANTIAGO, the defendants, and others known and unknown, during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, namely, a Hobbs Act robbery conspiracy and an attempted Hobbs Act robbery in violation of Title 18, United States Code, Sections 1951 and 2, willfully and knowingly did use and carry a firearm, and, in furtherance of such crimes, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, and in the course of that crime did cause the death of a person through the use of a

firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, JAQUEZ, HERRERA, and SANTIAGO conspired to rob and attempted to rob at gunpoint Maximiliano Campusano, a/k/a "Capri," in the vicinity of 20 Bogardus Place, New York, New York, during which robbery the defendants' co-conspirator shot and killed Campusano.

(Title 18, United States Code, Sections 924(j)(1) and 2.)


FOREPERSON



JOON H. KIM *ms*
Acting United States Attorney

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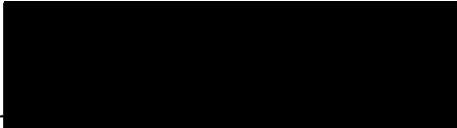
Defendants.

INDICTMENT

17 Cr. ____ ()

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Foreperson.
