

Filed Under Seal

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Notices of forfeiture

SECOND SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or around June 2017 through March 21, 2018, in Berks County, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a "Chewy,"
a/k/a "Che,"
YOMAR VELAZQUEZ-FIGUEROA
a/k/a "Negrito,"
FITZGERALD DALIOT-RIOS,
a/k/a "Barber,"
MARIELA ALVARADO,
a/k/a "Onyx,"
DEWAYNE QUINONES,
a/k/a "Hombre,"
OWEN MALAVE-MEDINA,
PEDRO SANCHEZ-LAPORTE,
a/k/a "Javi," and
LILLIAN GARCIA-ORTIZ,
a/k/a "Lilly,"**

conspired and agreed, together with G.M., S.M.O., F.L., and R.R., charged elsewhere, and others known and unknown to the Grand Jury, to knowingly and intentionally distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

2. It is further alleged that, with respect to the conspiracy charged in this Count, 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, is attributable, and was reasonably foreseeable, to defendants JESUS FELICIANO-TRINIDAD, YOMAR VELAZQUEZ-FIGUEROA, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

3. It is further alleged that, with respect to the conspiracy charged in this Count, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, is attributable, and was reasonably foreseeable, to defendants JESUS FELICIANO-TRINIDAD, YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, MARIELA ALVARADO, DEWAYNE QUINONES, OWEN MALAVE-MEDINA, PEDRO SANCHEZ-LAPORTE, LILLIAN GARCIA-ORTIZ, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

4. It is further alleged that, with respect to the conspiracy charged in this Count, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, is attributable, and was reasonably foreseeable, to defendants JESUS FELICIANO-TRINIDAD, YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, MARIELA ALVARADO, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

5. It is further alleged that, with respect to the conspiracy charged in this Count, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, is attributable, and was reasonably foreseeable, to defendants OWEN MALAVE-MEDINA and PEDRO SANCHEZ-LAPORTE, in violation of Title 21 United States Code, Section 841(a)(1), (b)(1)(C).

6. It is further alleged that, with respect to the conspiracy charged in this Count, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, is attributable, and was reasonably foreseeable, to defendants

JESUS FELICIANO-TRINIDAD, FITZGERALD DALIOT-RIOS, and MARIELA ALVARADO, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

MANNER AND MEANS

It was part of the conspiracy that:

5. Defendant JESUS FELICIANO-TRINIDAD was the leader and organizer of a drug trafficking group (hereinafter “the Trinidad DTG”) that obtained distribution quantities of methamphetamine, heroin, fentanyl, cocaine, cocaine base (“crack”), synthetic cannabinoids and other controlled substances from suppliers, including from F.L., both outside and within the Eastern District of Pennsylvania. From in or around June 2017 through March 21, 2018, the Trinidad DTG distributed in excess of 500 grams of methamphetamine, 100 grams of heroin, 500 grams of cocaine, and quantities of crack cocaine and other controlled substances.

6. Defendant JESUS FELICIANO-TRINIDAD and others known and unknown to the Grand Jury, supplied methamphetamine, heroin, cocaine, crack cocaine and other controlled substances to other members of the Trinidad DTG, including defendants YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, MARIELA ALVARADO, DEWAYNE QUINONES, OWEN MALAVE-MEDINA, PEDRO SANCHEZ-LAPORTE, LILLIAN GARCIA-ORTIZ for redistribution to individual drug customers.

7. Defendant LILLIAN GARCIA-ORTIZ and S.M.O. and others known to the Grand Jury facilitated the distribution of drugs to defendant JESUS FELICIANO-TRINIDAD, who then delivered the drugs to other members of the Trinidad DTG both known and unknown to the Grand Jury, for redistribution.

8. In the summer 2017, S.M.O. introduced F.L. as a source of drug supply to defendants JESUS FELICIANO-TRINIDAD and PEDRO SANCHEZ-LAPORTE. S.M.O. acted as a conduit of drug supply between F.L. and defendants FELICIANO-TRINIDAD and SANCHEZ-LAPORTE.

9. Defendant FITZGERALD DALIOT-RIOS, and G.M., and others known and unknown to the Grand Jury repackaged the bulk drugs for defendant JESUS FELICIANO-TRINIDAD and the Trinidad DTG for redistribution from 34 South 11th Street, 304 South 6th Street, and other known and unknown locations in Reading, Pennsylvania for street sales to drug customers both known and unknown to the Grand Jury.

10. Members of the Trinidad DTG routinely utilized telephones and various forms of electronic social media to communicate about the drug trafficking and violent activities of the Trinidad DTG.

11. Members of the Trinidad DTG routinely utilized firearms and acts of violence in furtherance of the organization's drug trafficking activities.

12. Members of the Trinidad DTG used various residences as "stash houses" to store, process, and package controlled substances, and various residences as "distribution houses" to distribute sums of controlled substances, in the Reading, Pennsylvania area, including but not limited to:

- a. 318 Wood Street,
- b. 329 Lombard Street,
- c. 2188 D Elder Street,
- d. 34 South 11th Street,

- e. 329 Constitution Way,
- f. 333 Constitution Way,
- g. 304 South 6th Street,
- h. 800 Franklin Street, 1st Floor,
- i. 123 S. 3rd Street, and
- j. 837 Muhlenberg Street.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objectives, the defendants and others known and unknown to the Grand Jury committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about June 8, 2017, defendant MARIELA ALVARADO distributed approximately .07 grams of cocaine base (“crack”), a Schedule II controlled substance, to an Undercover Police Officer (the “UC”), a person known to the Grand Jury, who was acting at the direction of law enforcement.
2. On or about June 13, 2017, defendant MARIELA ALVARADO distributed approximately .03 grams of cocaine base (“crack”), a Schedule II controlled substance to the UC.
3. On or about June 15, 2017, defendant MARIELA ALVARADO distributed approximately .04 grams of cocaine base (“crack”), a Schedule II controlled substance to the UC.

4. On or about June 26, 2017, defendant MARIELA ALVARADO distributed approximately 7 grams of synthetic cannabinoid (indole carboxamide), a Schedule I controlled substance to the UC.

5. In or about August 2017 through March 21, 2018, defendant JESUS FELICIANO-TRINIDAD received methamphetamine, heroin, and cocaine from F.L., and then defendant FELICIANO-TRINIDAD and members of the Trinidad DTG redistributed the drugs in user quantities to persons known and unknown to the Grand Jury.

6. In or about August 2017, defendant PEDRO SANCHEZ-LAPORTE received heroin and cocaine from F.L., and then defendant SANCHEZ-LAPORTE and members of the Trinidad DTG redistributed the drugs in user quantities to persons known and unknown to the Grand Jury.

7. On or about December 13, 2017, defendants JESUS FELICIANO-TRINIDAD, YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, and others known and unknown to the Grand Jury shot and killed Miguel Reyes, in order to expand the drug distribution territory for the Trinidad DTG.

8. On or about January 21, 2018, defendants JESUS FELICIANO-TRINIDAD, YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, L.D. (deceased), and J.C.G. (charged elsewhere), and others known and unknown to the Grand Jury, including Angel Rivera-Silva and Mayco Alvarez-Jackson, kidnapped Hector Gonzalez-Rivera a/k/a/ "Pollito," after Gonzalez-Rivera failed to follow defendant FELICIANO-TRINIDAD's instructions to shoot at a rival drug trafficker and failed to return the firearm that defendant FELICIANO-TRINIDAD had provided him for the shooting.

9. Between on or about January 21, 2018 and on or about January 24, 2018, defendants JESUS FELICIANO-TRINIDAD, YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, L.D. (deceased), and J.C.G. (charged elsewhere), and others known and unknown to the Grand Jury, including Mayco Alvarez-Jackson, held Hector Gonzalez-Rivera in the basement of 34 S. 11th Street in Reading, Pennsylvania and assaulted and starved him.

10. On or about January 24, 2018, defendant JESUS FELICIANO-TRINIDAD directed defendants YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, L.D. (deceased), and others known and unknown to the Grand Jury, to kill Hector Gonzalez-Rivera, a/k/a "Pollito." Specifically, defendant FELICIANO-TRINIDAD directed that Gonzalez Rivera be killed by drug overdose injection and then if necessary by gunshot in order to send a message that Gonzalez Rivera failed to follow defendant FELICIANO-TRINIDAD's orders and stole his firearm.

11. On or about January 28, 2018, defendants JESUS FELICIANO-TRINIDAD, YOMAR VELAZQUEZ-FIGUEROA, DEWAYNE QUINONES, PEDRO SANCHEZ-LAPORTE, and others known and unknown to the Grand Jury, including Mayco Alvarez-Jackson, shot and killed Jarlyn Lantigua-Tejada, Juan Rodriguez, Nelson Onofre, and Joshua Santos in order to expand the drug distribution territory for the Trinidad DTG.

12. On or about February 3, 2018, defendant JESUS FELICIANO-TRINIDAD distributed approximately 13 grams of cocaine, a Schedule II controlled substance, to a confidential human source ("CS"), a person known and unknown to the Grand Jury, who was acting at the direction of law enforcement.

13. On or about February 16, 2018, defendant JESUS FELICIANO-TRINIDAD distributed approximately 13 grams of cocaine, a Schedule II controlled substance, to the CS.

14. On or about February 17, 2018, defendants JESUS FELICIANO-TRINIDAD, YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, DEWAYNE QUINONES, R.R. (charged elsewhere), J.D., and J.A.V., who are known to the Grand Jury, drove to a residence on the 1100 block of Marion Street in Reading, Pennsylvania, used by rival drug trafficker R.S., and fired multiple gunshots at the residence.

On or about February 25, 2018:

15. Defendant JESUS FELICIANO-TRINIDAD asked F.L., a person known to the Grand Jury, to give him 50 grams of cocaine, stating, "I need 50 to cook I'm dry at the spot I have the ticket," to which F.L. responded, "Ok give me a few."

16. Defendant JESUS FELICIANO-TRINIDAD contacted defendant FITZGERALD DALIOT-RIOS by cell phone and directed defendant DALIOT-RIOS to bring him the items he needed to convert cocaine into cocaine base. In that same conversation, defendant FELICIANO-TRINIDAD also directed defendant YOMAR VELAZQUEZ-FIGUEROA to bring drug proceeds to defendant FELICIANO-TRINIDAD.

17. F.L. subsequently delivered the 50 grams of cocaine to defendant JESUS FELICIANO-TRINIDAD.

18. F.L. also contacted defendant JESUS FELICIANO-TRINIDAD asking where defendant FELICIANO-TRINIDAD was in order to deliver 50 grams of heroin.

19. Defendant JESUS FELICIANO-TRINIDAD directed F.L. to deliver the heroin to 318 Wood Street and give it to “her,” defendant LILLIAN GARCIA-ORTIZ.

20. Defendant JESUS FELICIANO-TRINIDAD informed defendant FITZGERALD DALIOT-RIOS to tell defendant YOMAR VELAZQUEZ-FIGUEROA to deliver drug proceeds to 318 Wood Street and give it to defendant LILLIAN GARCIA-ORTIZ, stating, “send [defendant VELAZQUEZ-FIGUEROA] over there. When he gets there tell him to call me. So I can send Lilly [defendant LILLIAN GARCIA-ORTIZ] to open the girl.”

21. Defendants JESUS FELICIANO-TRINIDAD, FITZGERALD DALIOT-RIOS, YOMAR VELAZQUEZ FIGUEROA, DEWAYNE QUINONES, R.R. and E.O., who are known to the Grand Jury, discussed plans to shoot and murder a rival drug trafficker R.S.

On or about February 26, 2018:

22. Defendants JESUS FELICIANO-TRINIDAD, FITZGERALD DALIOT-RIOS, YOMAR VELAZQUEZ FIGUEROA, DEWAYNE QUINONES, R.R., J.F.R. and V.V.T., who are known to the Grand Jury, attempted to find a rival drug trafficker named D.R., who is known to the Grand Jury, in order to shoot and murder D.R.

23. Defendants JESUS FELICIANO- TRINIDAD, YOMAR VELAZQUEZ-FIGUEROA, and S.M.O. distributed approximately 55 grams of methamphetamine, a Schedule II controlled substance, to the CS.

24. On or about February 27, 2018, defendants JESUS FELICIANO-TRINIDAD, DEWAYNE QUINONES, FITZGERALD DALIOT-RIOS, YOMAR VELAZQUEZ-FIGUEROA, S.M.O., F.L., and K.R. agreed to kidnap R.G.E., a person known to the Grand Jury, assault him and force him to pay his drug debts.

On or about March 3, 2018:

25. Defendant JESUS FELICIANO-TRINIDAD contacted defendant FITZGERALD DALIOT-RIOS and directed him to prepare 3 grams of heroin for M.V.M., a person known to the Grand Jury.

26. Defendant FITZGERALD DALIOT-RIOS subsequently delivered 3 grams of heroin to M.V.M.

27. On or about March 6, 2018, defendants JESUS FELICIANO-TRINIDAD and YOMAR VELAZQUEZ-FIGUEROA, distributed approximately 5 grams of heroin, a Schedule I controlled substance, and approximately 27 grams of methamphetamine, a Schedule II controlled substance, to the CS.

On or about March 7, 2018:

28. Defendant JESUS FELICIANO-TRINIDAD directed G.M. to package a quantity of heroin for distribution.

29. Defendant JESUS FELICIANO-TRINIDAD directed defendants FITZGERALD DALIOT-RIOS and YOMAR VELAZQUEZ-FIGUEROA to provide 30 grams of heroin to G.M.

30. Defendant YOMAR VELAZQUEZ-FIGUEROA provided heroin to G.M. intended for repacking and subsequent redistribution by the Trinidad DTG.

On or about March 13, 2018:

31. Defendants JESUS FELICIANO-TRINIDAD, MARIELA ALVARADO, FITZGERALD DALIOT-RIOS distributed approximately .5 grams of cocaine base ("crack"), a Schedule II controlled substance to the CS.

32. Defendant JESUS FELICIANO-TRINIDAD contacted F.L. for 100 grams of heroin.

33. F.L. delivered the 100 grams of heroin to defendant JESUS FELICIANO-TRINIDAD. Defendant FELICIANO-TRINIDAD then gave it to defendant DEWAYNE QUINONES.

34. Defendant DEWAYNE QUINONES then delivered the 100 grams of heroin to G.M. for her to process into user quantity amounts for street sales for the Trinidad DTG.

35. In a telephone conversation, defendant JESUS FELICIANO-TRINIDAD, and G.M. discussed the heroin that G.M. was breaking down into user quantities.

36. On or about March 16, 2018, defendants JESUS FELICIANO-TRINIDAD and MARIELA ALVARADO, distributed 50 bags (approximately .79 grams) of heroin, a Schedule I controlled substance to the CS.

On or about March 21, 2018:

37. Defendants FITZGERALD DALIOT-RIOS and MARIELA ALVARADO possessed heroin, a mixture of heroin and fentanyl, synthetic cannabinoids, a ballistic vest, a green .223/5.56 mm pistol, with no serial number, with an attached 50-round drum magazine that was loaded with 48 live rounds of .223 caliber ammunition, a Colt .38 caliber revolver, bearing serial number 829256, 202 live rounds of Winchester .40 caliber ammunition, 126 live rounds of 9 mm ammunition, two 9mm XD9 magazines, one loaded with 7 live rounds, the other with 8 live rounds, 28 live rounds of .45 caliber ammunition, and approximately 28 cellular telephones.

38. Defendants YOMAR VELAZQUEZ-FIGUEROA and OWEN MALAVE-MEDINA possessed heroin, cocaine, synthetic cannabinoids, a Galena Industries/AMT .45 caliber semiautomatic pistol, bearing serial number GBA01247 that was loaded with 4 live rounds of ammunition, a Springfield XD40 .40 caliber pistol, bearing serial number US418088 that was loaded with 11 live rounds of ammunition, 7 cellular telephones, a digital scale, processing equipment for drugs, records of drug sales, and \$515 cash.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 8, 2017, in Berks County, in the Eastern District of Pennsylvania, defendant

**MARIELA ALVARADO,
a/k/a “Onyx,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 13, 2017, in Berks County, in the Eastern District of
Pennsylvania, defendant

**MARIELA ALVARADO,
a/k/a “Onyx,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount
of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 15, 2017, in Berks County, in the Eastern District of Pennsylvania, defendant

**MARIELA ALVARADO,
a/k/a “Onyx,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. From on or about January 21, 2018, through on or about January 24, 2018, in Berks County, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a “Chewy,”
a/k/a “Che,”
YOMAR VELAZQUEZ-FIGUEROA
a/k/a “Negrito,”
FITZGERALD DALIOT-RIOS,
a/k/a “Barber,”
ANGEL RIVERA-SILVA,
a/k/a “Estrellita,” and
MAYCO ALVAREZ-JACKSON,
a/k/a “Pipon,”**

conspired and agreed with L.D., deceased, J.C.G., charged elsewhere, and others known and unknown to the Grand Jury, to knowingly, willfully, and unlawfully seize, confine, kidnap, abduct, carry away, and hold, Hector Gonzalez-Rivera, a/k/a “Pollito,” deceased, for ransom, reward, and otherwise, that is, for the purpose of punishing Gonzalez Rivera, a person known to the Grand Jury, for failing to follow defendant JESUS FELICIANO-TRINIDAD’s instructions to shoot at a rival drug trafficker’s residence and for failing to return defendant FELICIANO-TRINIDAD’s firearm, resulting in the death of Gonzalez Rivera, and, in committing the offense used a means, facility, and instrumentality of interstate commerce, that is, a mobile telephone, in violation of Title 18, United States Code, Section 1201(a)(1).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant JESUS FELICIANO-TRINIDAD and the Trinidad DTG routinely

used violence to intimidate rival drug traffickers in order to ensure the success of the Trinidad DTG operating in Reading, Pennsylvania.

3. Defendant JESUS FELICIANO-TRINIDAD directed Hector Gonzalez Rivera to shoot at a rival drug trafficker's residence located in Reading, Pennsylvania and defendant FELICIANO-TRINIDAD provided Gonzalez Rivera with a firearm.

4. After Hector Gonzalez-Rivera failed to follow defendant JESUS FELICIANO-TRINIDAD's instructions to shoot at a rival drug trafficker's residence and failed to return the firearm that defendant FELICIANO-TRINIDAD provided for the shooting, defendants FELICIANO-TRINIDAD, YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, ANGEL RIVERA-SILVA, MAYCO ALVAREZ-JACKSON, L.D. (deceased), and J.C.G. (charged elsewhere), and persons known and unknown to the Grand Jury agreed to kidnap Hector Gonzalez-Rivera.

5. Defendants JESUS FELICIANO-TRINIDAD, YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, ANGEL RIVERA-SILVA, MAYCO ALVAREZ-JACKSON used a communication facility and an instrumentality of interstate commerce, that is, a mobile telephone to effectuate this agreement.

OVERT ACTS

In furtherance of the conspiracy and to affect the object of the conspiracy, defendants JESUS FELICIANO-TRINIDAD, YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, ANGEL RIVERA-SILVA, MAYCO ALVAREZ-JACKSON, and others known and unknown to the Grand Jury committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about January 21, 2018:

1. Defendant JESUS FELICIANO-TRINIDAD, in Reading, Pennsylvania communicated with defendant ANGEL RIVERA-SILVA, by mobile telephone, and defendant RIVERA-SILVA stated that Hector Gonzalez-Rivera was in defendant RIVERA-SILVA's vehicle and that defendant RIVERA-SILVA would bring Gonzalez Rivera to an agreed upon location to meet with defendant FELICIANO-TRINIDAD and his DTG associates.

2. Defendants JESUS FELICIANO-TRINIDAD and MAYCO ALVAREZ-JACKSON drove to a parking lot in Reading, Pennsylvania to meet defendant ANGEL RIVERA-SILVA and Hector Gonzalez-Rivera.

3. Upon arrival at the location, defendants JESUS FELICIANO-TRINIDAD and MAYCO ALVAREZ-JACKSON assaulted Hector Gonzalez-Rivera, and then kidnapped and transported him to a Trinidad DTG drug house located at 34 South 11th Street, in Reading, Pennsylvania, which was operated by defendant FITZGERALD DALIOT-RIOS.

4. Defendants JESUS FELICIANO-TRINIDAD, YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, and MAYCO ALVAREZ-JACKSON forced Hector Gonzalez-Rivera into the basement.

5. Defendants JESUS FELICIANO-TRINIDAD, MAYCO ALVAREZ-JACKSON, and others known and unknown to the Grand Jury, assaulted Hector Gonzalez-Rivera by hitting Gonzalez Rivera with their fists and a piece of wood while Gonzalez Rivera was held against his will in the basement.

6. Defendants JESUS FELICIANO-TRINIDAD, YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, and L.D. held Hector Gonzalez-Rivera, in the

basement for several days providing Gonzalez Rivera with little food or water.

On or about January 24, 2018:

7. Defendant JESUS FELICIANO-TRINIDAD ordered defendants YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, and L.D. to kill Hector Gonzalez-Rivera by injecting Gonzalez Rivera with a fatal drug overdose or if necessary by shooting him.

8. Defendants YOMAR VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, and L.D. injected Hector Gonzalez-Rivera with drugs in an attempt to cause a drug fatal overdose, however, when that failed to kill Gonzalez Rivera, defendants VELAZQUEZ-FIGUEROA, FITZGERALD DALIOT-RIOS, and L.D. forced Gonzalez Rivera to an alley and shot him in the head.

All in violation of Title 18, United States Code, Section 1201(c).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 24, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a “Chewy,”
a/k/a “Che,”
YOMAR VELAZQUEZ-FIGUEROA
a/k/a “Negrito,”
FITZGERALD DALIOT-RIOS,
a/k/a “Barber,”
ANGEL RIVERA-SILVA,
a/k/a “Estrellita,”
MAYCO ALVAREZ-JACKSON,
a/k/a “Pipon,”**

knowingly, willfully, and unlawfully seized, confined, kidnapped, abducted, carried away, and held, and aided and abetted the unlawful seizing, confining, kidnapping, abducting, carrying away, and holding of, Hector Gonzalez-Rivera, a/k/a “Pollito,” deceased, for ransom, reward, and otherwise, that is, for the purpose of punishing Gonzalez Rivera for failing to follow defendant JESUS FELICIANO-TRINIDAD’s instructions to shoot at a rival drug trafficker’s residence and for failing to return defendant FELICIANO-TRINIDAD’s firearm, resulting in the death of Gonzalez Rivera, and, in committing the offense, used a communication facility and an instrumentality of interstate commerce, that is, a mobile phone.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 24, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a "Chewy,"
a/k/a "Che,"
YOMAR VELAZQUEZ-FIGUEROA
a/k/a "Negrito,"
FITZGERALD DALIOT-RIOS,
a/k/a "Barber,"**

and others known and unknown to the Grand Jury knowingly used, carried, brandished, and discharged, and aided and abetted the use, carrying, brandishing, and discharge of, a firearm, that is, a Colt .38 caliber revolver, bearing serial number 829256, in furtherance of a drug trafficking crime, for which they may be prosecuted in a Court of the United States, that is, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as charged in Count One of this Second Superseding Indictment.

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

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 24, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a “Chewy,”
a/k/a “Che,”
YOMAR VELAZQUEZ-FIGUEROA,
a/k/a “Negrito,”
FITZGERALD DALIOT-RIOS,
a/k/a “Barber,”**

knowing used, carried, and discharged, and aided and abetted the use, carrying, and discharge of, a firearm, that is, a Colt .38 caliber revolver, bearing serial number 829256, in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, that is, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death, and aided and abetted the killing, of a person through the use of that firearm, which killing is murder, as defined in Title 18, United States Code, Section 1111, in that the defendants and others known and unknown to the Grand Jury, with malice aforethought, unlawfully killed Hector Gonzalez-Rivera, a/k/a “Pollito,” by shooting him with the firearm willfully, deliberately, maliciously, and with premeditation.

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

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 28, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a "Chewy,"
a/k/a "Che,"
YOMAR VELAZQUEZ-FIGUEROA,
a/k/a "Negrito,"
DEWAYNE QUINONES,
a/k/a "Hombre,"
PEDRO SANCHEZ-LAPORTE,
a/k/a "Javi,"
MAYCO ALVAREZ-JACKSON,
a/k/a "Pipon,"**

and others known and unknown to the Grand Jury knowingly used, carried, brandished, and discharged, and aided and abetted the use, carrying, brandishing, and discharge of, a firearm, that is, at least one of the following:

(1) a Cobray M-11 9mm firearm, bearing serial number 89-0068001; and

(2) a Springfield XD40 .40 caliber pistol, bearing serial number US418088,

in furtherance of a drug trafficking crime, for which they may be prosecuted in a Court of the United States, that is, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as charged in Count One of this Second Superseding Indictment.

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

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 28, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a "Chewy,"
a/k/a "Che,"
YOMAR VELAZQUEZ-FIGUEROA,
a/k/a "Negrito,"
DEWAYNE QUINONES,
a/k/a "Hombre,"
PEDRO SANCHEZ-LAPORTE,
a/k/a "Javi,"
MAYCO ALVAREZ-JACKSON,
a/k/a "Pipon,"**

knowing used, carried, and discharged, and aided and abetted the use, carrying, and discharge of, a firearm, that is at least one of the following:

- (1) a Cobray M-11 9mm firearm, bearing serial number 89-0068001; and
- (2) a Springfield XD40 .40 caliber pistol, bearing serial number US418088;

in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, that is, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death, and aided and abetted the killing, of persons through the use of that firearm, which killing is murder, as defined in Title 18, United States Code, Section 1111, in that the defendants and others known and unknown to the Grand Jury, with malice aforethought, unlawfully killed Jarlyn Lantigua-Tejada, Juan Rodriguez,

Nelson Onofre, and Joshua Santos by shooting them with firearms willfully, deliberately, maliciously, and with premeditation.

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

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 3, 2018, in Berks County, in the Eastern District of Pennsylvania, defendant

**JESUS FELICIANO-TRINIDAD,
a/k/a “Chewy,”
a/k/a “Che,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2018, in Berks County, in the Eastern District of Pennsylvania, defendant

**JESUS FELICIANO-TRINIDAD,
a/k/a “Chewy,”
a/k/a “Che,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 17, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a "Chewy,"
a/k/a "Che,"
YOMAR VELAZQUEZ-FIGUEROA,
a/k/a "Negrito,"
FITZGERALD DALIOT-RIOS,
a/k/a "Barber," and
DEWAYNE QUINONES,
a/k/a "Hombre,"**

knowingly used, carried, and discharged a firearm, and aided and abetted the use, carrying, and discharging of a firearm, that is: (1) a green AR-15, bearing no serial number; (2) a Springfield XD40, bearing serial number US418088; (3) a Springfield XDS 9mm handgun, bearing serial number S3844656; (4) a Glock 27 .40 caliber handgun, bearing serial number WKX121; and (5) a Smith and Wesson .380 caliber handgun, bearing serial number KER4863, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to distribute a controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), as charged in Count One of this Second Superseding Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 26, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a "Chewy,"
a/k/a "Che,"
YOMAR VELAZQUEZ-FIGUEROA,
a/k/a "Negrito,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 50 grams or more, that is, approximately 55.88 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 26, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a “Chewy,”
a/k/a “Che,”
DEWAYNE QUINONES,
a/k/a “Hombre,”**

knowingly possessed, and aided and abetted the possession of, a firearm, that is at least one of the following:

- (1) a Glock 27 .40 caliber handgun, bearing serial number WKX121;
- (2) a Smith and Wesson 9mm handgun, bearing serial number HTH6748; and
- (3) Smith and Wesson .380 caliber handgun, bearing serial number KER4863,

in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to distribute a controlled substance, in violation of Title 21, United States Code, Section 846, 841(a)(1), as charged in Count One of this Second Superseding Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about February 27, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a “Chewy,”
a/k/a “Che,”
YOMAR VELAZQUEZ-FIGUEROA,
a/k/a “Negrito,”
FITZGERALD DALIOT-RIOS,
a/k/a “Barber,” and
DEWAYNE QUINONES,
a/k/a “Hombre,”**

conspired and agreed with S.M.O., F.L., K.R., all charged elsewhere, and others known and unknown to the Grand Jury, including L.D. (deceased), to knowingly, willfully, and unlawfully seize, confine, kidnap, abduct, carry away, and hold R.G.E., a person known to the Grand Jury, for ransom, reward, and otherwise, and, in committing the offense, used a communication facility and an instrumentality of interstate commerce, that is, a mobile phone, in violation of Title 18, United States Code, Section 1201(a)(1).

MANNER AND MEANS

It was part of the conspiracy that:

2. F.L. previously provided methamphetamine to K.R., who then sold methamphetamine and cocaine to R.G.E., a person known to the Grand Jury, on a consignment agreement, that is, K.R. allowed R.G.E. to purchase controlled substances on credit and make the payment at a later time.

3. When R.G.E. did not make prompt payment in full, defendants JESUS FELICIANO-TRINIDAD, DEWAYNE QUINONES, FITZGERALD DALIOT-RIOS, YOMAR VELAZQUEZ-FIGUEROA, F.L., S.M.O., K.R. and L.D., agreed to kidnap R.G.E. assault him, and force him to pay his drug debt.

4. Defendants JESUS FELICIANO-TRINIDAD, DEWAYNE QUINONES, FITZGERALD DALIOT-RIOS, YOMAR VELAZQUEZ-FIGUEROA, F.L., S.M.O., K.R. and L.D. utilized a communication facility to speak with each other in order to facilitate the plan to kidnap R.G.E., assault him, and force him to pay his drug debt.

OVERT ACTS

In furtherance of the conspiracy and to affect the object of the conspiracy, defendants JESUS FELICIANO-TRINIDAD, DEWAYNE QUINONES, FITZGERALD DALIOT-RIOS, YOMAR VELAZQUEZ-FIGUEROA, S.M.O., F.L. K.R., all charged elsewhere, and others known and unknown to the Grand Jury, including L.D. (deceased), committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about February 27, 2018:

1. Defendant JESUS FELICIANO-TRINIDAD, in Reading, Pennsylvania contacted S.M.O., by mobile telephone, while S.M.O. was in the presence of F.L., who was using a mobile telephone to communicate with K.R., in order to ascertain the whereabouts of R.G.E.

2. F.L. then informed S.M.O of the whereabouts of R.G.E to help facilitate the kidnapping and assault of R.G.E.

3. S.M.O. contacted defendant JESUS FELICIANO-TRINIDAD by telephone and provided defendant FELICIANO-TRINIDAD the information regarding the whereabouts of R.G.E.

4. Defendants JESUS FELICIANO-TRINIDAD, DEWAYNE QUINONES, YOMAR VELAZQUEZ-FIGUEROA and L.D. actively searched and attempted to locate R.G.E.

5. K.R. then spoke with F.L. and informed F.L. of the updated whereabouts of R.G.E.

6. S.M.O. and F.L. continued to make telephone calls to defendant JESUS FELICIANO- TRINIDAD in order to provide information regarding R.G.E.'s current whereabouts.

All in violation of Title 18, United States Code, Section 1201(c).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 6, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a "Chewy,"
a/k/a "Che,"
YOMAR VELAZQUEZ-FIGUEROA,
a/k/a "Negrito,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 13, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a “Chewy,”
a/k/a “Che,”
FITZGERALD DALIOT-RIOS,
a/k/a “Barber,” and
MARIELA ALVARADO,
a/k/a “Onyx,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 16, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a “Chewy,”
a/k/a “Che,”
MARIELA ALVARADO,
a/k/a “Onyx,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 21, 2018, in Berks County, in the Eastern District of Pennsylvania, defendant

**FITZGERALD DALIOT-RIOS,
a/k/a “Barber,”
MARIELA ALVARADO,
a/k/a “Onyx,”**

knowingly and intentionally possessed with the intent to distribute, and aided and abetted the possession with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance and N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 21, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**FITZGERALD DALIOT-RIOS,
a/k/a "Barber,"
MARIELA ALVARADO,
a/k/a "Onyx,"**

knowingly possessed and aided and abetted the possession of a firearm, that is, at least one of the following:

- (1) a green .223/5.56 mm pistol, with no serial number, with an attached 50-round drum magazine loaded with 48 live rounds of .223 caliber ammunition; and
- (2) a Colt .38 caliber revolver, bearing serial number 829256;

in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is conspiracy to distribute controlled substances, and possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as charged in Count One of this Second Superseding Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 21, 2018, in Berks County, in the Eastern District of Pennsylvania, defendant

**MARIELA ALVARADO,
a/k/a “Onyx,”**

knowing she had previously been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed a firearm, at least one of the following:

- (1) a green .223/5.56 mm pistol, with no serial number, with an attached 50 live round drum magazine loaded with 48 live rounds of .223 caliber ammunition;
- (2) a Colt .38 caliber revolver, bearing serial number 829256,

and that firearm was used in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 21, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**YOMAR VELAZQUEZ-FIGUEROA,
a/k/a "Negrito,"
OWEN MALAVE-MEDINA,**

knowingly and intentionally possessed with the intent to distribute, and aided and abetted the possession with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 21, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**YOMAR VELAZQUEZ-FIGUEROA,
a/k/a "Negrito,"
OWEN MALAVE-MEDINA,**

knowingly possessed and aided and abetted the possession of a firearm, that is, at least one of the following:

- (1) a Galena Industries/AMT .45 caliber semiautomatic pistol, bearing serial number GBA01247, loaded with 4 live rounds of .45 caliber ammunition;
and
- (2) a Springfield XD40 .40 caliber pistol, bearing serial number US418088,
loaded with 11 live rounds of .40 caliber ammunition,

in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is conspiracy to distribute controlled substances, and aiding and abetting the possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as charged in Counts One and Seventeen respectively, of this Second Superseding Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 21, 2018, in Berks County, in the Eastern District of Pennsylvania, defendant

OWEN MALAVE-MEDINA,

knowing he had previously in a court in the Commonwealth of Pennsylvania of a crime punishable by imprisonment exceeding one year, knowingly possessed a firearm, at least one of the following:

(1) a Galena Industries/AMT .45 caliber semiautomatic pistol, bearing serial number GBA01247, loaded with 4 live rounds of .45 caliber ammunition;
and

(2) a Springfield XD40 .40 caliber pistol, bearing serial number US418088,
loaded with 11 live rounds of .40 caliber ammunition, and that firearm was

used in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

From on or about August 2017 to on or about March 21, 2018, in
Berks County, in the Eastern District of Pennsylvania, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a "Chewy,"
a/k/a "Che,"
YOMAR VELAZQUEZ-FIGUEROA,
a/k/a "Negrito,"
FITZGERALD DALIOT-RIOS,
a/k/a "Barber," and
MARIELA ALVARADO,
a/k/a "Onyx,"**

did unlawfully and knowingly open, lease, rent, use and maintain, and aid and abet the opening,
leasing, renting, using and maintaining of a place, permanently and temporarily, located at 34
South 11th Street in Reading, for the purpose of unlawfully manufacturing, distributing, and
using controlled substances.

In violation of Title 21, United States Code, Section 856(a)(1) and Title 18,
United States Code, Section 2.

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

From on or about March 6, 2018 to on or about March 21, 2018, in Berks County, in the Eastern District of Pennsylvania, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a “Chewy,”
a/k/a “Che,”
YOMAR VELAZQUEZ-FIGUEROA,
a/k/a “Negrito,” and
OWEN MALAVE-MEDINA,**

did unlawfully and knowingly open, lease, rent, use and maintain, and aid and abet the opening, leasing, renting, using and maintaining of a place, permanently and temporarily, located at 304 South 6th Street in Reading, for the purpose of unlawfully manufacturing, distributing, and using controlled substances.

In violation of Title 21, United States Code, Section 856(a)(1) and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE NO. 1

FORFEITURE - 21 U.S.C. § 853

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846 set forth in this Second Superseding Indictment, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a "Chewy,"
a/k/a "Che,"
YOMAR VELAZQUEZ-FIGUEROA,
a/k/a "Negrito,"
FITZGERALD DALIOT-RIOS,
a/k/a "Barber,"
MARIELA ALVARADO,
a/k/a "Onyx,"
DEWAYNE QUINONES,
a/k/a "Hombre,"
OWEN MALAVE-MEDINA,
PEDRO SANCHEZ-LAPORTE,
a/k/a "Javi, and
LILLIAN ORTIZ,
a/k/a "Lilly,"**

shall forfeit to the United States of America:

- (a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense; including but not limited to:
- (1) a green .223/5.56 mm pistol, with no serial number;
 - (2) a 50 round drum magazine loaded with 48 live rounds of .223 caliber ammunition;
 - (3) a Colt .38 caliber revolver, bearing serial number 829256;
 - (4) 202 live rounds of Winchester .40 caliber ammunition;

- (5) 126 live rounds of 9mm ammunition;
- (6) two 9mm XD9 magazines with a total of 15 live rounds of ammunition;
- (7) 28 live rounds of .45 caliber ammunition;
- (8) a Galena Industries/AMT .45 caliber semiautomatic pistol, bearing serial number GBA01247;
- (9) 4 live rounds of .45 caliber ammunition;
- (10) a Springfield XD40 .40 caliber pistol, bearing serial number US418088;
- (11) 11 live rounds of .40 caliber ammunition;
- (12) a Springfield XDS 9mm handgun, bearing serial number S3844656;
- (13) a Glock 27 .40 caliber handgun, bearing serial number WKX121;
- (14) a Smith & Wesson .380 caliber handgun, bearing serial number KER4863;
- (15) a Smith & Wesson 9mm handgun, bearing serial number HTH6748;
- (16) a Cobray M-11 9mm firearm, bearing serial number 89-0068001;
- (17) a Smith & Wesson rifle, M&P, bearing serial number SRR11229;
and
- (18) two magazines, one of which was loaded with 20 live rounds of .223 ammunition.

and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

2. If any of the property subject to forfeiture, 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 party;
- (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 divided 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 property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

NOTICE OF FORFEITURE NO. 2

FORFEITURE - 18 U.S.C. § 924(d)

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 924(c), 924(j) and 922(g)(1), set forth in this Second Superseding Indictment, defendants

**JESUS FELICIANO-TRINIDAD,
a/k/a "Chewy,"
a/k/a "Che,"
YOMAR VELAZQUEZ-FIGUEROA,
a/k/a "Negrito,"
FITZGERALD DALIOT-RIOS,
a/k/a "Barber,"
MARIELA ALVARADO,
a/k/a "Onyx,"
DEWAYNE QUINONES,
a/k/a "Hombre,"
OWEN MALAVE-MEDINA,
PEDRO SANCHEZ-LAPORTE,
a/k/a "Javi," and
MAYCO ALVAREZ-JACKSON,
a/k/a "Pipon"**

shall forfeit to the United States of America, the firearms and ammunition involved in the commission of these offenses, including, but not limited to:


- (1) a green .223/5.56 mm pistol, with no serial number;
- (2) a 50 round drum magazine loaded with 48 live rounds of .223 caliber ammunition;
- (3) a Colt .38 caliber revolver, bearing serial number 829256;
- (4) 202 live rounds of Winchester .40 caliber ammunition;
- (5) 126 live rounds of 9mm ammunition;
- (6) two 9mm XD9 magazines with a total of 15 live rounds of

ammunition;

- (7) 28 live rounds of .45 caliber ammunition;
- (8) a Galena Industries/AMT .45 caliber semiautomatic pistol, bearing serial number GBA01247;
- (9) 4 live rounds of .45 caliber ammunition;
- (10) a Springfield XD40 .40 caliber pistol, bearing serial number US418088;
- (11) 11 live rounds of .40 caliber ammunition;
- (12) a Springfield XDS 9mm handgun, bearing serial number S3844656;
- (13) a Glock 27 .40 caliber handgun, bearing serial number WKX121;
- (14) a Smith & Wesson .380 caliber handgun, bearing serial number KER4863;
- (15) a Smith & Wesson 9mm handgun, bearing serial number HTH6748;
- (16) a Cobray M-11 9mm firearm, bearing serial number 89-0068001;
- (17) a Smith & Wesson rifle, M&P, bearing serial number SRR11229;
- and
- (18) two magazines, one of which was loaded with 20 live rounds of .223 ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,
United States Code, Section 924(d).

A TRUE BILL:

for 

WILLIAM M. MCSWAIN
UNITED STATES ATTORNEY

FOREPERSON

JS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SECOND SUPERSEDING INDICTMENT

19-152

DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106-4476

Post Office: Philadelphia

County: Philadelphia

City and State of Defendant: SEE REVERSE

County: SEE REVERSE

Register number: SEE REVERSE

Place of accident, incident, or transaction:

Eastern District of Pennsylvania

Post Office: FDPA

County: Berks

RELATED CASE, IF ANY:

Criminal cases are deemed related when the answer to the following question is "yes".

Does this case involve a defendant or defendants alleged to have participated in the same action or transaction, or in the same series of acts or transactions, constituting an offense or offenses?

YES/NO: YES

Case Number: 19-CR-150 (Sealed) Judge: Schmehl and 19-CR-152 Judge: Sanchez (Sealed)

CRIMINAL: (Criminal Category - FOR USE BY U.S. ATTORNEY ONLY)

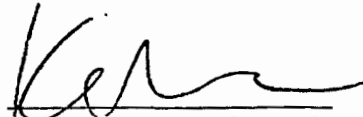
1. ☐ Antitrust
2. ☐ Income Tax and other Tax Prosecutions
3. ☐ Commercial Mail Fraud
4. ☒ Controlled Substances
5. ☐ Violations of 18 U.S.C. Chapters 95 and 96 (Sections 1951-55 and 1961-68) and Mail Fraud other than commercial
6. ☐ General Criminal

(U.S. ATTORNEY WILL PLEASE DESIGNATE PARTICULAR CRIME AND STATUTE CHARGED TO BE VIOLATED AND STATE ANY PREVIOUS CRIMINAL NUMBER FOR SPEEDY TRIAL ACT TRACKING PURPOSES)

- 21 U.S.C. § 846 (conspiracy to distribute controlled substances- 1 count)
21 U.S.C. § 841(a)(1), (b)(1)(C) (distribution of cocaine base ("crack") -- 4 counts)
21 U.S.C. § 841(a)(1), (b)(1)(C) (distribution of cocaine - 2 counts)
21 U.S.C. § 841(a)(1), (b)(1)(B) (distribution of 50 grams of methamphetamine - 1 count)
21 U.S.C. § 841(a)(1), (b)(1)(C) (distribution of methamphetamine and heroin - 1 count)
21 U.S.C. § 841(a)(1), (b)(1)(C) (distribution of heroin - 1 count)
21 U.S.C. § 841(a)(1), (b)(1)(C) (possession with the intent to distribute heroin and fentanyl - 1 count)

21 U.S.C. § 841(a)(1), (b)(1)(C) (possession with the intent to distribute heroin and cocaine – 1 count)
21 U.S.C. § 856(a) (using and maintaining a drug premise – 2 counts)
18 U.S.C. § 924(j)(1) (murder in the course of using and carrying a firearm in furtherance of drug trafficking – 2 counts)
18 U.S.C. § 924(c)(1)(A) (possession of a firearm in furtherance of drug trafficking – 3 counts)
18 U.S.C. § 924(c)(1)(A) (discharge of a firearm in furtherance of drug trafficking – 3 counts)
18 U.S.C. § 922(g)(1) (possession of a firearm by a felon – 2 counts)
18 U.S.C. § 1201(c) (conspiracy to commit kidnapping– 2 counts)
18 U.S.C. § 1201(a) (kidnapping – 1 count)
18 U.S.C. § 2 (aiding and abetting)
Notices of forfeiture

DATE: October 23, 2019


Kelly A. Lewis Fallenstein
Assistant United States Attorney

File No. 2018R00038
U.S. v. JESUS FELICIANO-TRINIDAD, ET AL.

DEFENDANTS

JESUS FELICIANO-TRINIDAD, a/k/a “Chewy,” a/k/a “Che”

DOB: [REDACTED]
REGISTER # 77148-066
CITY & STATE OF DEFENDANT: Reading, PA
COUNTY: Berks

YOMAR VELAZQUEZ-FIGUEROA, a/k/a “Negrito”

DOB: [REDACTED]
REGISTER # 77129-066
CITY & STATE OF DEFENDANT: Reading, PA
COUNTY: Berks

FITZGERALD DALIOT-RIOS, a/k/a “Barber”

DOB: [REDACTED]
REGISTER # 77140-066
CITY & STATE OF DEFENDANT: Reading, PA
COUNTY: Berks

MARIELA ALVARADO, a/k/a “Onyx”

DOB: [REDACTED]
REGISTER # 1700172614 (as a federal inmate)
CITY & STATE OF DEFENDANT: Reading, PA
COUNTY: Berks

DEWAYNE QUINONES, a/k/a “Hombre”

DOB: [REDACTED]
REGISTER # 199716 (as a federal inmate)
CITY & STATE OF DEFENDANT: Reading, PA
COUNTY: Berks

OWEN MALAVE-MEDINA

DOB: [REDACTED]

REGISTER # 77151-066

CITY & STATE OF DEFENDANT: Reading, PA

COUNTY: Berks

PEDRO SANCHEZ-LAPORTE, a/k/a "Javi"

DOB: [REDACTED]

REGISTER # N/A

CITY & STATE OF DEFENDANT: Reading, PA

COUNTY: Berks

LILLIAN GARCIA-ORTIZ, a/k/a "Lilly"

DOB: [REDACTED]

REGISTER # N/A

CITY & STATE OF DEFENDANT: Reading, PA

COUNTY: Berks

ANGEL RIVERA-SILVA, a/k/a "Estrellita"

DOB: [REDACTED]

REGISTER: 2015-5633

CITY & STATE OF DEFENDANT: Reading, PA

COUNTY: Berks

MAYCO ALVAREZ-JACKSON, a/k/a "Pipon"

DOB: [REDACTED]

REGISTER: NS8610

CITY & STATE OF DEFENDANT: Reading, PA

COUNTY: Berks