

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

GRAND JURY N-21-2

UNITED STATES OF AMERICA

No. 3:22CR 118(JAM) (CR4) (~~108~~)

v.

VIOLATIONS:

LUIS FELICIANO, a.k.a. "Louminaty,"
JOSE TIRADO, a.k.a. "Joselito" and "Leet"
CARL JONES, a.k.a. "M.O.B."
LUIS ROBLES, a.k.a. "Lou,"
ROBERTO DIAZ, a.k.a. "Dragon Eyes,"
MILTON ROSARIO, a.k.a. "Little,"
ANGEL DELGADO,
MARTIN MALDONADO,
JEREMY OZUNA,
ROBERT VALLE,
MARSHA WATSON,
DEVIN TEXIRA, a.k.a. "LV"
JOSHUA RODRIGUEZ,
JOEL DELEON, JR., a.k.a. "Psycho,"
HERIBERTO MENDEZ, a.k.a. "Big Ed,"
CHRISTOPHER GILLIARD, a.k.a. "CJ" and
"Gilly"

21 U.S.C. § 846
(Conspiracy to Distribute and to Possess with
Intent to Distribute Controlled Substances)

21 U.S.C. § 841(a)(1)
(Possession with Intent to Distribute and
Distribution of Controlled Substances)

18 U.S.C. § 922(g)(1) and 924(a)(2)
(Unlawful Possession of Firearms and
Ammunition by Prohibited Persons)

18 U.S.C. §§ 922(k) and 924(a)(1)(B)
(Unlawful Possession of a Firearm with
Obliterated Serial Number)

18 U.S.C. § 2
(Aiding and Abetting)

INDICTMENT

The Grand Jury charges:

COUNT ONE

(Conspiracy to Distribute and to Possess with Intent to Distribute Controlled Substances)

1. From approximately June 2021 through April 13, 2022, the exact dates being unknown to the Grand Jury, in the District of Connecticut and elsewhere, the defendants LUIS FELICIANO, a.k.a. "Louminaty," JOSE TIRADO, a.k.a. "Joselito" and "Leet," CARL JONES,

a.k.a. “M.O.B.,” LUIS ROBLES, a.k.a. “Lou,” ROBERTO DIAZ, a.k.a. “Dragon Eyes,” MILTON ROSARIO, a.k.a. “Little,” ANGEL DELGADO, MARTIN MALDONADO, JEREMY OZUNA, ROBERT VALLE, and MARSHA WATSON, together with others known and unknown to the Grand Jury, did knowingly and intentionally conspire to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that defendants FELICIANO, TIRADO, JONES, ROBLES, DIAZ, ROSARIO, DELGADO, MALDONADO, OZUNA, VALLE, and WATSON, together with others known and unknown to the Grand Jury, would distribute and possess with intent to distribute controlled substances, namely, N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, heroin, a Schedule I controlled substance, and cocaine base (“crack cocaine”) and cocaine, both Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

QUANTITY OF CONTROLLED SUBSTANCES INVOLVED IN THE CONSPIRACY

3. Defendant FELICIANO knew and reasonably should have foreseen from his own conduct and that of other members of the narcotics conspiracy charged in Count One that the conspiracy involved 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, a mixture and substance containing a detectable amount of crack cocaine, a Schedule II 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, Sections 841(b)(1)(A)(i), 841(b)(1)(A)(vi) and 841(b)(1)(C).

4. Defendant TIRADO knew and reasonably should have foreseen from his own conduct and that of other members of the narcotics conspiracy charged in Count One that the conspiracy involved 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(vi).

5. Defendants JONES, ROBLES, DIAZ, ROSARIO, DELGADO, RODRIGUEZ, MALDONADO, OZUNA, VALLE, and WATSON, knew and reasonably should have foreseen from their own conduct and that of other members of the narcotics conspiracy charged in Count One that the conspiracy involved a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, a mixture and substance containing a detectable amount of crack cocaine, a Schedule II 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(b)(1)(C).

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

COUNT TWO

(Possession with Intent to Distribute, and Distribution, of Fentanyl)

6. On or about June 15, 2021, in the District of Connecticut, the defendant CARL JONES, a.k.a. "M.O.B.," knowingly and intentionally possessed with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance.

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

COUNT THREE

(Possession with Intent to Distribute, and Distribution, of Fentanyl)

7. On or about August 16, 2021, in the District of Connecticut, the defendant CARL JONES, a.k.a. "M.O.B.," knowingly and intentionally possessed with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance.

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

COUNT FOUR

(Unlawful Possession of a Firearm by a Felon)

8. On or about August 16, 2021, in the District of Connecticut, the defendant CARL JONES, a.k.a. "M.O.B.," having been, and knowing that he had been, convicted in the Superior Court of the State of Connecticut of a crime punishable by a term of imprisonment exceeding one year, namely: (a) Possession with Intent to Sell Narcotics, in violation of Conn. Gen. Stat. § 21a-277(a), on January 3, 2020; (b) Assault 1st degree, in violation of Conn. Gen. Stat. § 53a-59(a)(1), on January 26, 2009; (c) Possession of Narcotics, in violation of Conn. Gen. Stat. § 21a-279(a), on December 19, 2007; (d) Possession of Narcotics, in violation of Conn. Gen. Stat. § 21a-279(a), on February 2, 2005; (e) Failure to Appear 1st Degree, in violation of Conn. Gen. Stat. § 53a-172, on November 18, 2004; (f) Possession of Narcotics, in violation of Conn. Gen. Stat. § 21a-279(a), on May 20, 2003; (g) Larceny 3rd Degree, in violation of Conn. Gen. Stat. § 53a-124, on February 13, 2001; and (h) Larceny 3rd Degree, in violation of Conn. Gen. Stat. § 53a-124 and Failure to Appear in the First Degree, in violation of Conn. Gen. Stat. § 53a-172, on August 6, 1998, did knowingly possess a firearm in and affecting commerce, namely, one SKS SCOUT 7.62 rifle, bearing serial number MA 4154, which had been shipped and transported in interstate and foreign

commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT FIVE

(Possession with Intent to Distribute, and Distribution, of Fentanyl)

9. On or about August 26, 2021, in the District of Connecticut, the defendant JOSE TIRADO, a.k.a. “Joselito” and “Leet,” knowingly and intentionally possessed with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

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

COUNT SIX

(Possession with Intent to Distribute, and Distribution, of Fentanyl)

10. On or about October 1, 2021, in the District of Connecticut, the defendant JOSE TIRADO, a.k.a. “Joselito” and “Leet,” knowingly and intentionally possessed with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

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

COUNT SEVEN

(Unlawful Possession of a Firearm by a Felon)

11. On or about October 1, 2021, in the District of Connecticut, the defendant JOSE TIRADO, a.k.a. “Joselito” and “Leet,” having been, and knowing that he had been, convicted in the Superior Court of the State of Connecticut of a crime punishable by a term of imprisonment exceeding one year, namely: (a) Unlawful Possession of a Weapon in a Motor Vehicle, in violation of Conn. Gen. Stat. § 29-38, and Possession with Intent to Distribute Narcotics, in violation of

Conn. Gen. Stat. § 21a-277(a), on February 17, 2015; (b) Sale of Hallucinogens/Narcotics, in violation of Conn. Gen. Stat. § 21a-277(a), on August 4, 2008; (c) Criminal Mischief 1st degree, in violation of Conn. Gen. Stat. § 53a-115, on November 18, 2004; (d) Sale of Hallucinogens/Narcotics, in violation of Conn. Gen. Stat. § 21a-277(a), on July 23, 2001; and (e) Sale of Hallucinogens/Narcotics, in violation of Conn. Gen. Stat. § 21a-277(a), on October 18, 2000, did knowingly possess a firearm in and affecting commerce, namely, one Taurus, Model PT111 Millennium G2, 9 mm pistol, bearing serial number TKR68753, which had been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT EIGHT

(Unlawful Possession of a Firearm by a Felon)

12. On or about October 1, 2021, in the District of Connecticut, the defendant DEVIN TEXIRA, a.k.a. "LV," having been, and knowing that he had been, convicted in the Superior Court of the State of Connecticut of a crime punishable by a term of imprisonment exceeding one year, namely: (a) Escape 1st Degree, in violation of Conn. Gen. Stat. § 53a-169, on January 7, 2020; (b) Criminal Possession of a Firearm, in violation of Conn. Gen. Stat. § 53a-217, on November 23, 2016; and (c) Robbery 2nd Degree, in violation of Conn. Stat. Gen. § 53a-135(a), and Conspiracy to Commit Assault 2nd Degree, in violation of Conn. Gen. Stat. § 53a-60(a)(1), on June 18, 2015, did knowingly possess a firearm in and affecting commerce, namely one Taurus, Model PT111 Millennium G2, 9 mm pistol, bearing serial number TKR68753, which had been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT NINE

(Possession with Intent to Distribute, and Distribution, of Fentanyl)

13. On or about October 7, 2021, in the District of Connecticut, the defendant JOSE TIRADO, a.k.a. "Joselito" and "Leet," knowingly and intentionally possessed with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance.

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

COUNT TEN


(Possession with Intent to Distribute, and Distribution, of Fentanyl)

14. On or about November 9, 2021, in the District of Connecticut, the defendant JOSE TIRADO, a.k.a. "Joselito" and "Leet," knowingly and intentionally possessed with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance.

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

COUNT ELEVEN

(Possession with Intent to Distribute, and Distribution, of Crack Cocaine)

15. On or about November 12, 2021, in the District of Connecticut, the defendant CARL JONES, a.k.a. "M.O.B.," knowingly and intentionally possessed with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of cocaine ~~base~~ ("crack cocaine"), a Schedule II controlled substance. 

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

COUNT TWELVE

(Possession with Intent to Distribute, and Distribution, of Fentanyl)

16. On or about December 20, 2021, in the District of Connecticut, the defendants

JOSE TIRADO, a.k.a. “Joselito” and “Leet,” and JOSHUA RODRIGUEZ knowingly and intentionally possessed with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

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

COUNT THIRTEEN
(Unlawful Possession of a Firearm by a Felon)

17. On or about March 8, 2022, in the District of Connecticut, the defendant JOEL DELEON, JR., a.k.a. “Psycho,” having been, and knowing that he had been, convicted in the United States District Court for the District of Connecticut and the Superior Court of the State of Connecticut of a crime punishable by a term of imprisonment exceeding one year, namely: (a) Possession with Intent to Distribute Heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), on November 23, 2015; (b) Conspiracy to Sell Narcotics, in violation of Conn. Gen. Stat. § 21a-277(a), on March 7, 2002; (c) Sale of a Controlled Substance, in violation of Conn. Stat. Gen. § 21a-277(b), Possession of Narcotics, in violation of Conn. Gen. Stat. § 21a-279, and Failure to Appear 1st Degree, in violation of Conn. Gen. Stat. § 53a-172, on April 26, 1999; and (d) Failure to Appear 1st Degree, in violation of Conn. Gen. Stat. § 53a-172, on March 11, 1998, did knowingly possess a firearm in and affecting commerce, namely one North American Arms, .22 caliber magnum revolver, bearing serial number Z19268, which had been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT FOURTEEN

(Possession with Intent to Distribute Fentanyl and Cocaine)

18. On or about March 8, 2022, in the District of Connecticut, the defendant JOEL DELEON JR., a.k.a. “Psycho,” knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), and a mixture and substance containing a detectable amount of cocaine, both Schedule II controlled substances.

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

COUNT FIFTEEN

(Possession with Intent to Distribute Fentanyl and Cocaine Base)

19. On or about March 9, 2022, in the District of Connecticut, the defendant LUIS ROBLES, a.k.a. “Lou,” knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”) and a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”), both Schedule II controlled substances.

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

COUNT SIXTEEN

(Possession of a Firearm with an Obliterated Serial Number)

20. On or about March 9, 2022, in the District of Connecticut, the defendant LUIS ROBLES, a.k.a. “Lou,” knowingly possessed and received a firearm, that is, a Smith & Wesson, .357 magnum revolver, that had been shipped and transported in interstate and foreign commerce, from which the manufacturer’s serial number had been removed, altered, and obliterated.

In violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

COUNT SEVENTEEN

(Unlawful Possession of a Firearm by a Felon)

21. On or about March 9, 2022, in the District of Connecticut, the defendant JOSE TIRADO, a.k.a. “Joselito” and “Leet,” having been, and knowing that he had been, convicted in the Superior Court of the State of Connecticut of a crime punishable by a term of imprisonment exceeding one year, namely: (a) Unlawful Possession of a Weapon in a Motor Vehicle, in violation of Conn. Gen. Stat. § 29-38, and Possession with Intent to Distribute Narcotics, in violation of Conn. Gen. Stat. § 21a-277(a), on February 17, 2015; (b) Sale of Hallucinogens/Narcotics, in violation of Conn. Gen. Stat. § 21a-277(a), on August 4, 2008; (c) Criminal Mischief 1st degree, in violation of Conn. Gen. Stat. § 53a-115, on November 18, 2004; (d) Sale of Hallucinogens/Narcotics, in violation of Conn. Gen. Stat. § 21a-277(a), on July 23, 2001; and (e) Sale of Hallucinogens/Narcotics, in violation of Conn. Gen. Stat. § 21a-277(a), on October 18, 2000, did knowingly possess a firearm in and affecting commerce, namely, one Glock, Model 48, 9 mm pistol, bearing serial number BLGN115, which had been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT EIGHTEEN

(Unlawful Possession of a Firearm by a Felon)

22. On or about March 9, 2022, in the District of Connecticut, the defendant HERIBERTO MENDEZ, a.k.a. “Big Ed,” having been, and knowing that he had been, convicted in the Superior Court of the State of Connecticut of a crime punishable by a term of imprisonment exceeding one year, namely: (a) Sale of a Controlled Substance, in violation of Conn. Gen. Stat. § 21a-277(b), on May 21, 2008; (b) Possession of Narcotics, in violation of Conn. Gen. Stat. § 21a-

279, on October 6, 2005; (c) Possession of Narcotics, in violation of Conn. Gen. Stat. § 21a-279, on April 28, 2004; (d) Possession of Narcotics, in violation of Conn. Gen. Stat. § 21a-279, on Auguste 29, 1998; and (e) Sale of Hallucinogens/Narcotics, in violation of Conn. Gen. Stat. § 21a-277(a), on November 22, 1997, did knowingly possess a firearm in and affecting commerce, namely, one Glock, Model 48, 9 mm pistol, bearing serial number BLGN115, which had been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT NINETEEN

(Possession with Intent to Distribute, and Distribution, of Fentanyl)

23. On or about March 14, 2022, in the District of Connecticut, the defendant JOSE TIRADO, a.k.a. “Joselito” and “Leet,” knowingly and intentionally possessed with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance. In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY

(Possession with Intent to Distribute, and Distribution, of Fentanyl)

24. On or about March 21, 2022, in the District of Connecticut, the defendant JOSE TIRADO, a.k.a. “Joselito” and “Leet,” knowingly and intentionally possessed with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance. In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-ONE

(Possession with Intent to Distribute, and Distribution, of Fentanyl)

25. On or about March 29, 2022, in the District of Connecticut, the defendant CHRISTOPHER GILLIARD, a.k.a. “CJ” and “Gilly,” knowingly and intentionally possessed with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

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

COUNT TWENTY-TWO

(Possession with Intent to Distribute Fentanyl, Heroin, and Cocaine)

26. On or about March 31, 2022, in the District of Connecticut, the defendant ANGEL DELGADO knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II 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, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-THREE

(Possession with Intent to Distribute, and Distribution, of Fentanyl)

27. On or about April 6, 2022, in the District of Connecticut, the defendant CHRISTOPHER GILLIARD, a.k.a. “CJ” and “Gilly,” knowingly and intentionally possessed with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled

substance.

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

COUNTY TWENTY-FOUR
(Possession with Intent to Distribute Fentanyl and Heroin)

28. On or about April 13, 2022, in the District of Connecticut, the defendant LUIS FELICIANO, a.k.a. “Louminaty,” knowingly and intentionally possessed with intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i) and (vi).

COUNT TWENTY-FIVE
(Possession with Intent to Distribute Cocaine Base and Cocaine)

29. On or about April 13, 2022, in the District of Connecticut, the defendant LUIS FELICIANO, a.k.a. “Louminaty,” knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”) and a mixture and substance containing a detectable amount of cocaine, both Schedule II controlled substances.

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

COUNT TWENTY-SIX
(Unlawful Possession of Ammunition by a Felon)

30. On or about April 13, 2022, in the District of Connecticut, the defendant LUIS

FELICIANO, a.k.a. “Louminaty,” having been, and knowing that he had been, convicted in the Superior Court of the State of Connecticut of a crime punishable by a term of imprisonment exceeding one year, namely: (a) Possession with Intent to Sell Narcotics, in violation of Conn. Gen. Stat. § 21a-277(a), on December 13, 2019 (two counts); (b) Criminal Possession of a Gun, in violation of Conn. Gen. Stat. § 53a-217c, and Carrying a Pistol without a Permit, in violation of Conn. Gen. Stat. § 29-35(a), on March 11, 2013; (c) Possession of Narcotics, in violation of Conn. Gen. Stat. § 21a-279, on January 10, 2012; (d) Possession with Intent to Sell Narcotics, in violation of Conn. Gen. Stat. § 21a-277(a), on April 5, 2004; and (e) Sale of Hallucinogens/Narcotics, in violation of Conn. Gen. Stat. § 21a-277(a), on March 29, 2004, did knowingly possess ammunition in and affecting commerce, namely, approximately forty (40) rounds of Winchester 5.56 mm ammunition, which had been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWENTY-SEVEN

(Possession with Intent to Distribute, and Distribution, of Fentanyl)

31. On or about May 2, 2022, in the District of Connecticut, the defendant CHRISTOPHER GILLIARD, a.k.a. “CJ” and “Gilly,” knowingly and intentionally possessed with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

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

FORFEITURE ALLEGATION
(Controlled Substance Offenses)

32. Upon conviction of one or more of the controlled substance offenses alleged in Counts One through Three, Five, Six, Nine through Twelve, Fourteen, Fifteen, Nineteen through Twenty-Five, of this Indictment, the defendants LUIS FELICIANO, a.k.a. “Louminaty,” JOSE TIRADO, a.k.a. “Joselito” and “Leet,” CARL JONES, a.k.a. “M.O.B.,” LUIS ROBLES, a.k.a. “Lou,” ROBERTO DIAZ, a.k.a. “Dragon Eyes,” MILTON ROSARIO, a.k.a. “Little,” JUAN ACEVEDO, a.k.a. “Mikey,” ANGEL DELGADO, JOSHUA RODRIGUEZ, CHRISTOPHER GILLIARD, a.k.a. “CJ” and “Gilly,” MARTIN MALDONADO, JEREMY OZUNA, ROBERT VALLE, and MARSHA WATSON, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, all right, title, and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violations of Title 21, United States Code, Section 841, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations and a sum of money equal to the total amount of proceeds obtained as a result of the offenses, including but not limited to, the following:

- a) approximately \$1,870 seized from 331E Park Street, New Britain, Connecticut, on June 25, 2021;
- b) approximately \$1,815 seized from 1650 Main Street, Apartment 2B, Hartford, Connecticut, on March 9, 2022;
- c) approximately \$ 2,518 seized from 39 Millbrook Drive, East Hartford, Connecticut, on April 13, 2022; and
- d) Assorted gold jewelry seized from 39 Millbrook Drive, East Hartford, Connecticut, on April 13, 2022.

33. If any of the above-described forfeitable property, as a result of any act or omission

of the defendants named in this Indictment: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or disposed with, a third person; (c) has been placed beyond the jurisdiction of the United States District Court for the District of Connecticut; (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 defendants up to the value of the above-described forfeitable property.

All in accordance with Title 21, United States Code, Section 853, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION
(Firearm Offenses)

34. Upon conviction of one or more of the firearm offenses charged in Counts Four, Seven, Eight, Sixteen through Eighteen, and Twenty-Seven of this Indictment, defendants LUIS FELICIANO, a.k.a. "Louminaty," JOEL DELEON, JR., LUIS ROBLES, a.k.a. "Lou," and HERIBERTO MENDEZ, a.k.a. "Big Ed," shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offenses, including but not limited to, a North American Arms, .22 caliber magnum revolver, bearing serial number Z19268, which was seized on March 8, 2022, a Smith & Wesson, .357 Magnum, with an obliterated serial or removed serial number, which was seized on March 9, 2022, a Glock, Model 48, 9 mm pistol, bearing serial number BLGN11, which was seized on March 9, 2022, approximately 40 rounds of Winchester 5.56 mm ammunition, seized on April 13, 2022.


All in accordance with 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c), 21 U.S.C. § 853, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL

/s/

~~FOREPERSON~~

UNITED STATES OF AMERICA


VANESSA ROBERTS AVERY
UNITED STATES ATTORNEY


BRIAN P. LEAMING
ASSISTANT UNITED STATES ATTORNEY


ROBERT RUFF
ASSISTANT UNITED STATES ATTORNEY