

PER 100 MAR 13 2019
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: (Judge *Conner*)

THE GRAND JURY CHARGES:

COUNT 1
Conspiracy to Distribute and
Possess with Intent to
Distribute Controlled Substances
(21 U.S.C. § 846)

From on or about March 1, 2017, and continuing to on or about
March 13, 2019, in Dauphin and Northumberland Counties, within the
Middle District of Pennsylvania, and elsewhere, the defendants,

[REDACTED]

[2] KEVIN CABAN ROBLES,

[3] REYMOND NIEVES HERNANDEZ,

[REDACTED]

[5] RICARTE BRISTOL NEGRON, a/k/a "CANDO,"

[REDACTED]

[8] HAROLD MAYSONET PAGAN, a/k/a "CHANGO,"

[REDACTED]

[10] JAMIE MORALES RIVERA,

[11] JUSTO MELENDEZ, a/k/a "LOBI,"

[12] BRADIMIR AVILES HERNANDEZ and

[12] ROBERT PACHECO,

knowingly and intentionally combined, conspired, confederated, and
agreed together, and with other persons, known and unknown to the
Grand Jury, to commit the following offenses against the United States:
to knowingly and intentionally distribute and possess with intent to
distribute a mixture and substance containing a detectable amount of

heroin, a Schedule I controlled substance, a detectable amount of cocaine hydrochloride, a Schedule II controlled substance and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

MANNER AND MEANS

It was a part of the conspiracy that kilogram quantities of cocaine hydrochloride were sent from Puerto Rico via the United States Postal Service to Pennsylvania. It was also a part of the conspiracy that kilogram quantities of cocaine hydrochloride were purchased in California and transported to Pennsylvania. Some of the cocaine hydrochloride was then distributed to co-conspirators for distribution to customers in Dauphin and Northumberland Counties in Pennsylvania.

It was also part of the conspiracy that kilogram quantities of heroin and gram quantities of fentanyl were obtained from known and unknown sources and distributed to co-conspirators for distribution to customers in Dauphin and Northumberland Counties in Pennsylvania.

Moreover, in furtherance of the conspiracy, co-conspirators maintained apartments in Milton, Pennsylvania for the purpose of distributing heroin, fentanyl and cocaine hydrochloride.

OVERT ACTS

In furtherance of this conspiracy and to effect and accomplish the objects of the conspiracy, one or more of the defendants or conspirators, both indicted and unindicted, committed, among others, the following overt acts in the Middle District of Pennsylvania and elsewhere:

1. On March 25, 2018, JUSTO MELENDEZ, a/k/a "LOBI," arranged to purchase an ounce of cocaine hydrochloride from REYMOND NIEVES HERNANDEZ.
2. On or about March 28, March 30 and April 4, 2018, KEVIN CABAN ROBLES and REYMOND NIEVES HERNANDEZ coordinated the exchange of heroin and cocaine hydrochloride with one another.
3. On or about April 6, 2017, KEVIN CABAN ROBLES distributed ten grams of heroin and three grams of fentanyl in Harrisburg, Pennsylvania.
4. On or about April 12, 2018, [REDACTED] distributed heroin and cocaine from an apartment operated by the co-conspirators for the purpose of distributing controlled substances.

5. On April 17, 2018, KEVIN CABAN ROBLES and REYMOND NIEVES HERNANDEZ discussed two anticipated shipments of cocaine hydrochloride that would be sent from Puerto Rico to Pennsylvania.
6. On or about April 20, 2018, KEVIN CABAN ROBLES distributed approximately 20 grams of heroin in Harrisburg, Pennsylvania.
7. On or about April 20, 2018, REYMOND NIEVES HERNANDEZ and JAMIE MORALES RIVERA, arranged for a one-kilogram shipment of cocaine hydrochloride to be delivered to Milton, Pennsylvania from Puerto Rico.
8. On or about April 24, 2018, REYMOND NIEVES HERNANDEZ and RICARTE BRISTOL NEGRON, a/k/a CANDO, arranged for a one-kilogram shipment of cocaine hydrochloride to be delivered to Milton, Pennsylvania from Puerto Rico.
9. On or about April 27, 2018, KEVIN CABAN ROBLES and REYMOND NIEVES HERNANDEZ arranged for the distribution of heroin and cocaine hydrochloride.

10. On or about May 3, 2018, KEVIN CABAN ROBLES and REYMOND NIEVES HERNANDEZ coordinated the distribution of drugs to RICARTE BRISTOL NEGRON, a/k/a CANDO.
11. On or about May 6, 2018 KEVIN CABAN ROBLES arranged to purchase one kilogram of heroin and one kilogram of cocaine hydrochloride from [REDACTED]
[REDACTED]
12. On or about May 7, 2018, KEVIN CABAN ROBLES and [REDACTED] arranged for the sale of cocaine hydrochloride and on May 8, 2018, [REDACTED]
[REDACTED] distributed approximately 340 grams of heroin to KEVIN CABAN ROBLES.
13. On or about May 10, 2018, KEVIN CABAN ROBLES and [REDACTED] arranged for the sale of heroin, and on May 17, 2018, [REDACTED]
[REDACTED] distributed heroin to KEVIN CABAN ROBLES.
14. On or about May 18, 2018, KEVIN CABAN ROBLES and [REDACTED] arranged for the

sale of cocaine hydrochloride and on May 23, 2018, [REDACTED]

[REDACTED] distributed cocaine hydrochloride to KEVIN CABAN ROBLES.

15. On or about June 4, 2018, KEVIN CABAN ROBLES and [REDACTED] arranged for the sale of cocaine hydrochloride.

16. One or about June 11, 2018, [REDACTED] distributed approximately 400 grams of cocaine hydrochloride to KEVIN CABAN ROBLES through an associate.

17. On or about June 14 and June 15, 2018, [REDACTED] attempted to obtain drug proceeds from KEVIN CABAN ROBLES.

18. On or about June 14, 2018, [REDACTED] and [REDACTED] planned to fly from New Jersey to California to facilitate the purchase of ten kilograms of cocaine hydrochloride. In furtherance of their plan, [REDACTED] and [REDACTED] attempted to

transport \$149,990 in U.S. currency through the Newark International Airport.

19. On or about June 18, 2018, [REDACTED] attempted to arrange for the purchase of four kilograms of cocaine hydrochloride from an unknown source of supply in California.

20. On or about June 18 and June 19, 2018, [REDACTED] distributed heroin to KEVIN CABAN ROBLES through a relative of KEVIN CABAN ROBLES.

QUANTITIES OF CONTROLLED SUBSTANCES
ATTRIBUTABLE TO EACH DEFENDANT
INVOLVED IN THE CONSPIRACY

Listed below is the amount of cocaine hydrochloride, heroin, and/or fentanyl, respectively, which is attributable to each of the defendants as a result of his or her own conduct and the conduct of other co-conspirators reasonably foreseeable to him or her:

[REDACTED] Five kilograms and more of a mixture and substance containing cocaine hydrochloride and one kilogram and more of a mixture and substance containing heroin.

[2] KEVIN CABAN ROBLES: Five kilograms and more of a mixture and substance containing cocaine hydrochloride, one kilogram and more of a mixture and substance containing heroin and 40 grams and more of a mixture and substance containing fentanyl.

[3] REYMOND NIEVES HERNANDEZ: Five kilograms and more of a mixture and substance containing cocaine hydrochloride and one kilogram and more of a mixture and substance containing heroin.

[REDACTED] Five kilograms and more of a mixture and substance containing cocaine hydrochloride.

[5] RICARTE BRISTOL NEGRON, a/k/a "CANDO:" 500 grams and more of a mixture and substance containing cocaine hydrochloride and 100 grams and more of a mixture and substance containing heroin.

[REDACTED] 500 grams and more of a mixture and substance containing cocaine hydrochloride and 100 grams and more of a mixture and substance containing heroin.

[REDACTED]
500 grams and more of a mixture and substance containing

cocaine hydrochloride and 100 grams and more of a mixture and substance containing heroin.

[8] HAROLD MAYSONET PAGAN, a/k/a "CHANGO:" 500 grams and more of a mixture and substance containing cocaine hydrochloride and 100 grams and more of a mixture and substance containing heroin.

 500 grams and more of a mixture and substance containing cocaine hydrochloride and 100 grams and more of a mixture and substance containing heroin.

[10] JAMIE MORALES RIVERA: 500 grams and more of a mixture and substance containing cocaine hydrochloride and an unspecified quantity of heroin.

[11] JUSTO MELENDEZ, a/k/a "LOBI:" an unspecified quantity of cocaine hydrochloride.

[12] BRADIMIR HERNANDEZ: an unspecified quantity of cocaine hydrochloride.

[13] ROBERT PACHECO: an unspecified quantity of heroin.

All in violation of Title 21, United States Code, Section 846 and 841(b)(1)(A)(i),(ii), (b)(1)(B)(i),(ii) and (C).

THE GRAND JURY FURTHER CHARGES:

COUNT 2

Distribution of Heroin
(21 U.S.C. § 841(a)(1))

On or about April 6, 2017, in Dauphin County, within the Middle District of Pennsylvania, the defendant,

[2] KEVIN CABAN ROBLES,

knowingly and intentionally distributed and possessed with intent to distribute a mixture and a substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

THE GRAND JURY FURTHER CHARGES:

COUNT 3

Distribution of Heroin and Cocaine
(21 U.S.C. § 841(a)(1))

On or about April 12, 2018, in Northumberland County, within the Middle District of Pennsylvania, the defendant,



knowingly and intentionally distributed and possessed with intent to distribute a mixture and a substance containing a detectable amount of heroin, a Schedule I controlled substance and a mixture and a substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance.

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

THE GRAND JURY FURTHER CHARGES:

COUNT 4
Distribution of Heroin
(21 U.S.C. § 841(a)(1))

On or about April 20, 2017, in Dauphin County, within the Middle District of Pennsylvania, the defendant,

[2] KEVIN CABAN ROBLES,

knowingly and intentionally distributed and possessed with intent to distribute a mixture and a substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

THE GRAND JURY FURTHER CHARGES:

COUNT 5

Attempted Possession with Intent
to Distribute Cocaine Hydrochloride
(21 U.S.C. § 846)

On or about April 20, 2018, in Northumberland County, within
the Middle District of Pennsylvania, the defendants,

[2] KEVIN CABAN ROBLES,
[3] REYMOND NIEVES HERNANDEZ, and
[10] JAMIE MORALES RIVERA,

did intentionally and knowingly attempt to possess with intent
to distribute, 500 grams and more of a mixture and substance containing a
detectable amount of cocaine hydrochloride, a Schedule II controlled
substance, and did aid, abet, counsel, command and induce the same.

All in violation of Title 21, United States Code, Sections 846 and
841(b)(1)(B)(ii) and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 6

Attempted Possession with Intent
to Distribute Cocaine Hydrochloride
(21 U.S.C. § 846)

On or about April 24, 2018, in Northumberland County, within
the Middle District of Pennsylvania, the defendants,

[2] KEVIN CABAN ROBLES,
[3] REYMOND NIEVES HERNANDEZ and
[5] RICARTE BRISTOL NEGRON, a/k/a "CANDO,"

did intentionally and knowingly attempt to possess with intent to distribute, 500 grams and more of a mixture and substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, and did aid, abet, counsel, command and induce the same.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(B)(ii) and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 7
Possession With Intent to
Distribute of Fentanyl and Cocaine
(21 U.S.C. § 841(a)(1))

~~On or about November 9, 2018, in Union County, within the~~
Middle District of Pennsylvania, the defendant,

[2] KEVIN CABAN ROBLES,

knowingly and intentionally possessed with intent to distribute a mixture and a substance containing a detectable amount of fentanyl, a Schedule II controlled substance and a mixture and a substance

containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance.

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

THE GRAND JURY FURTHER ALLEGES:

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 through 7 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) or 846, the defendants,

[REDACTED]
[2] KEVIN CABAN ROBLES,

[3] REYMOND NIEVES HERNANDEZ,
[REDACTED]

[5] RICARTE BRISTOL NEGRON, a/k/a "CANDO,"
[REDACTED]

[8] HAROLD MAYSONET PAGAN, a/k/a "CHANGO,"
[REDACTED]

[10] JAMIE MORALES RIVERA,
[11] JUSTO MELENDEZ, a/k/a "LOBI," and
[12] ROBERT PACHECO,

shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s). The property to be forfeited includes, but is not limited to, the following:

- a. Approximately \$149,990 in U.S. Currency seized from [REDACTED] and [REDACTED] on June 14, 2018.

3. If any of the property described above, 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 that cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

DAVID J. FREED
UNITED STATES ATTORNEY

TRUE BILL



DARYL F. BLOOM
Assistant United States Attorney



FOREPERSON

3/13/19
Date