

U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
FILED

2018 OCT 10 P 12: 12

UNITED STATES OF AMERICA,

STEPHEN C. DRIES
CLERK

SEALED

Plaintiff,

v.

Case No. 18-CR-175
[21 U.S.C. §§ 841(a)(1)
841(b)(1)(C), 841(b)(2),
841(h)(1)(A), 841(h)(1)(B), 846,
843(c)(2)(A), 843(d)(1), 952(a),
952(b), 960(a)(1), 960(b)(3),
960(b)(6), and 963; 18 U.S.C. § 2]

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

Defendants.

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Beginning in at least 2012 and continuing until on or about September 11, 2018, in
the State and Eastern District of Wisconsin, Argentina, and elsewhere,

**CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"**

and others, known and unknown to the Grand Jury, knowingly and intentionally

conspired to distribute controlled substances, including Oxycodone, a Schedule II controlled substance; Hydrocodone, a Schedule II controlled substance; Codeine, a Schedule II controlled substance; Tapentadol, a Schedule II controlled substance; Amphetamine, a Schedule II controlled substance; Methylphenidate, a Schedule II controlled substance; Tramadol, a Schedule IV controlled substance; Alprazolam, a Schedule IV controlled substance; Carisoprodol, a Schedule IV controlled substance; Zolpidem, a Schedule IV controlled substance; and Diazepam, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(2).

In violation of Title 21, United States Code Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

Beginning in at least 2012 and continuing until on or about September 11, 2018, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

**CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"**

and others known and unknown to the Grand Jury, did knowingly and intentionally deliver, distribute, and dispense a controlled substance by means of the internet, including by using websites www.goldpharma-24.com, Rxpharma24.com, Goldenpharma.com, Goldpharma24.com, Pharmgolden.com, Rxpharmatoday.com, goldpharmanew.com, and other websites to distribute controlled substances over the internet.

In violation of Title 21, United States Code, Sections 841(h)(1)(A), 841(h)(1)(B), 841(b)(1)(C), and 841(b)(2).

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

Beginning in at least 2012 and continuing until on or about September 11, 2018, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

**CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"**

and others known and unknown to the Grand Jury, did knowingly and intentionally use the internet and cause the internet to be used, to advertise the sale of and to offer to sell, distribute, and dispense, controlled substances where such sale, distribution, or dispensing is not authorized by law.

In violation of Title 21, United States Code, Sections 843(c)(2)(A) and 843(d)(1), and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

Beginning in at least 2012 and continuing until on or about September 11, 2018, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

**CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"**

and others known and unknown to the Grand Jury, knowingly and intentionally conspired with each other to import into the United States from any place outside thereof mixtures and substances containing a detectable amount of controlled substances including Oxycodone, a Schedule II controlled substance; Hydrocodone, a Schedule II controlled substance; Codeine, a Schedule II controlled substance; Tapentadol, a Schedule II controlled substance; Amphetamine, a Schedule II controlled substance; Methylphenidate, a Schedule II controlled substance; Tramadol, a Schedule IV controlled substance; Alprazolam, a Schedule IV controlled substance; Carisoprodol, a Schedule IV controlled substance; Zolpidem, a Schedule IV controlled substance; and Diazepam, a Schedule IV controlled substance.

In violation of Title 21, United States Code, Sections 952(a), 952(b), 960(a)(1), 960(b)(3), 960(b)(6), and 963.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

On or about June 25, 2015, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

**CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"**

knowingly attempted to import a mixture and substance containing Oxycodone, a Schedule II controlled substance, from India into the United States.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), 960(b)(3), and 963, and Title 18, United States Code, Section 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES:

On or about September 9, 2015, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

**CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"**

knowingly imported mixtures and substances containing Tramadol, a Schedule IV controlled substance, and Alprazolam, a Schedule IV controlled substance, from Romania and India into the United States.

In violation of Title 21, United States Code, Sections 952(a), 952(b), 960(a)(1), and 960(b)(6), and Title 18, United States Code, Section 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES:

On or about September 11, 2015, in the State and Eastern District of Wisconsin,
Argentina, and elsewhere,

**CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"**

knowingly imported mixtures and substances containing Carisoprodol, a Schedule IV controlled substance, and Diazepam, a Schedule IV controlled substance, from Romania and India into the United States.

In violation of Title 21, United States Code, Sections 952(b), 960(a)(1), and 960(b)(6), and Title 18, United States Code, Section 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES:

On or about August 13, 2016, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

**CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"**

knowingly imported a mixture and substance containing Codeine, a Schedule II controlled substance, from Romania into the United States.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(3), and Title 18, United States Code, Section 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES:

On or about November 22, 2016, in the State and Eastern District of Wisconsin,
Argentina, and elsewhere,

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

knowingly imported a mixture and substance containing Codeine, a Schedule II
controlled substance, from Romania into the United States.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and
960(b)(3), and Title 18, United States Code, Section 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES:

On or about December 27, 2016, in the State and Eastern District of Wisconsin,
Argentina, and elsewhere,

CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"

knowingly imported a mixture and substance containing Codeine, a Schedule II
controlled substance, from Romania into the United States.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and
960(b)(3), and Title 18, United States Code, Section 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES:

On or about April 24, 2017, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

**CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"**

knowingly imported a mixture and substance containing Codeine, a Schedule II controlled substance, from Romania into the United States.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(3), and Title 18, United States Code, Section 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES:

On or about September 4, 2018, in the State and Eastern District of Wisconsin, Argentina, and elsewhere,

**CONRADO ADOLFO FRENZEL, aka "Otto,"
JORGE ALEJANDRO PAURA, aka "Larry,"
SANTIAGO VIDEMATO, aka "James Duggan," aka "Ramona Ibarra,"
LUCIANO BRUNETTI, aka "Biff Tannen," aka "Lucho," and
LUCAS DANIEL PAURA, aka "Carl Carlson,"**

knowingly imported a mixture and substance containing Tapentadol, a Schedule II controlled substance, from Singapore into the United States.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(3), and Title 18, United States Code, Section 2.

FORFEITURE NOTICE

1. Upon conviction of one or more of the controlled substance offenses alleged in Counts One through Twelve of this Indictment, the defendants shall forfeit to the United States, pursuant to 21 U.S.C. §§ 853 and 970, 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation. The property to be forfeited includes, but is not limited to, a sum of money equal to the proceeds obtained as a result of the offense.

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), the United States of America shall be entitled to forfeit substitute property, including, but not limited to, the following:

a. The residential real property located at 600 NE 27 Street, Unit 1104, Miami, Florida;

b. The residential real property located at 1401 Village Boulevard, Unit 1514, West Palm Beach, Florida;

c. The residential real property located at 6950 NW 186th Street, Unit 2-302, Hialeah, Florida;

d. The residential real property located at 1701 Washington Street, #603, Hollywood, Florida;

e. The residential real property located at 1701 Washington Street, #201, Hollywood, Florida;

f. The residential real property located at 4709 Sable Pine Circle, #C1, West Palm Beach, Florida;

g. The residential real property located at 2825 NE 201st Terrace, #M226, Miami, Florida;

h. The residential real property located at 1106 Green Pine Boulevard, A2, West Palm Beach, Florida;

i. The residential real property located at 706 Executive Center, #11, West Palm Beach, Florida;

j. The residential real property located at 718 Executive Center, #11, West Palm Beach, Florida;

k. The residential real property located at 1025 92nd Street, Unit 804, Bay Harbour, Florida;

l. The residential real property located at 1104 18th Street, Unit #1, West Palm Beach, Florida;

m. The residential real property located at 1777 Venice Lane, #233, North Miami Beach, Florida;

n. The residential real property located at 1860 Venice Park Drive, #201, North Miami Beach, Florida;

- o. The residential real property located at 712 Sunny Pine Way, H3, Greenacres, Florida;
- p. The residential real property located at 1855 NE 121st Street, #30, North Miami, Florida;
- q. The residential real property located at 1410 Teal Court, Kissimmee, Florida;
- r. The residential real property located at 3901 South Ocean Drive, #11, Hollywood, Florida;
- s. The residential real property located at 1300 NE Miami Gardens Drive, #1005E, Miami, Florida;
- t. The residential real property located at 1025 92nd Street, #407, Bay Harbor, Florida;
- u. The residential real property located at 7612 Forest City Road, Unit G, Orlando, Florida;
- v. The residential real property located at 7644 Forest City Road, Unit E, Orlando, Florida;
- w. The residential real property located at 7604 Forest City Road, Unit B, Orlando, Florida;
- x. The residential real property located at 210 NW 10th Avenue, South Bay, Florida;
- y. The residential real property located at 400 Kings Point Drive, #621, Sunny Isles Beach, Florida;

z. The residential real property located at 1010 South West 2nd Avenue, #1101, Miami, Florida;

aa. The residential real property located at 1010 South West 2nd Avenue, #1507, Miami, Florida; and

bb. The residential real property located at 1701 Washington, #301, Hollywood, Florida.

A TRUE BILL:

[REDACTED]

FOREPERSON

Date: 10-10-18



MATTHEW D. KRUEGER
United States Attorney