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UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

Grand Jury H-19-1

UNITED STATES OF AMERICA

CRIMINAL NO. 3:21-cr-00089 (SRU) (TOF)

v.

VIOLATIONS:

RAY URENA, a.k.a. "Reuben,"
WILMER ANGEL RUIZ-SERRANO,
a.k.a. "Chi-Chi,"
YAN REYES, a.k.a. "Juan,"
RAMON VARGAS,
JOHNATTAN FERNANDEZ-LOPEZ,
and
JOSE LORA

21 U.S.C. § 846
(Conspiracy to Distribute, and to Possess with
Intent to Distribute Heroin, Fentanyl,
Cocaine, Cocaine Base, and Oxycodone)

21 U.S.C. § 841(a)(1) and (b)(1)(C)
(Possession with Intent to Distribute Fentanyl
and Oxycodone)

18 U.S.C. § 924(c)(1)(A)(i)
(Possession of a Firearm in Furtherance of a
Drug Trafficking Crime)

18 U.S.C. § 2
(Aiding and Abetting)

INDICTMENT

The Grand Jury charges:

COUNT ONE

(Conspiracy to possess with intent to distribute, and to distribute, heroin, fentanyl, cocaine,
cocaine base, and oxycodone)

1. From in or about January 2020 through in or about May 2021, the precise dates being unknown to the Grand Jury, in the District of Connecticut and elsewhere, the defendants RAY URENA, a.k.a "Reuben," WILMER ANGEL RUIZ-SERRANO, a.k.a. "Chi-Chi," YAN REYES, a.k.a. "Juan," RAMON VARGAS, JOHNATTAN FERNANDEZ-LOPEZ, and JOSE LORA, and others known and unknown to the Grand Jury, knowingly conspired together and with one another to possess with intent to distribute, and to distribute, controlled substances, contrary to the provisions of Title 21, United States Code, Section 841(a)(1), namely:

- a. A mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;
- b. A mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance;
- c. A mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance;
- d. A mixture and substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance; and
- e. A mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

QUANTITY OF HEROIN INVOLVED IN THE CONSPIRACY

2. Defendants RAY URENA, YAN REYES, RAMON VARGAS, JOHNATTAN FERNANDEZ-LOPEZ, and JOSE LORA knew from their own conduct as members of the narcotics conspiracy charged in Count One and from the reasonably foreseeable conduct of other members of that conspiracy, that the conspiracy involved 100 grams or more 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(b)(1)(B)(i).

QUANTITY OF FENTANYL INVOLVED IN THE CONSPIRACY

3. Defendants RAY URENA, YAN REYES, RAMON VARGAS, JOHNATTAN FERNANDEZ-LOPEZ, and JOSE LORA knew from their own conduct as members of the narcotics conspiracy charged in Count One and from the reasonably foreseeable conduct of other members of that conspiracy, 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).

4. Defendant WILMER ANGEL RUIZ-SERRANO knew from his own conduct as a member of the narcotics conspiracy charged in Count One and from the reasonably foreseeable

conduct of other members of that conspiracy, that the conspiracy involved 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)(C).

QUANTITY OF COCAINE INVOLVED IN THE CONSPIRACY

5. Defendants RAY URENA, YAN REYES, RAMON VARGAS, JOHNATTAN FERNANDEZ-LOPEZ, and JOSE LORA knew from their own conduct as members of the narcotics conspiracy charged in Count One and from the reasonably foreseeable conduct of other members of that conspiracy, that the conspiracy involved 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).

QUANTITY OF COCAINE BASE INVOLVED IN THE CONSPIRACY

6. Defendants RAY URENA, YAN REYES, RAMON VARGAS, JOHNATTAN FERNANDEZ-LOPEZ, and JOSE LORA knew from their own conduct as members of the narcotics conspiracy charged in Count One and from the reasonably foreseeable conduct of other members of that conspiracy, that the conspiracy involved 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21 United States Code, Section 841(b)(1)(B)(iii).

QUANTITY OF OXYCODONE INVOLVED IN THE CONSPIRACY

7. Defendants RAY URENA, YAN REYES, RAMON VARGAS, JOHNATTAN FERNANDEZ-LOPEZ, and JOSE LORA knew from their own conduct as members of the narcotics conspiracy charged in Count One and from the reasonably foreseeable conduct of other members of that conspiracy, that the conspiracy involved a mixture and substance containing a

detectable amount of oxycodone, 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)

8. On or about January 8, 2020, in the District of Connecticut, the defendant WILMER ANGEL RUIZ-SERRANO, a.k.a. "Chi Chi," knowingly and intentionally possessed with intent to distribute, and did distribute, a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

All 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 THREE

(Possession with intent to distribute and distribution of fentanyl)

9. On or about January 30, 2020, in the District of Connecticut, the defendant YAN REYES, a.k.a. "Juan," knowingly and intentionally possessed with intent to distribute, and did distribute, a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

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

COUNT FOUR

(Possession with intent to distribute and distribution of fentanyl)

10. On or about August 20, 2020, in the District of Connecticut, the defendants RAMON VARGAS and JOHNATTAN FERNANDEZ-LOPEZ knowingly and intentionally possessed with intent to distribute, and did distribute, a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

All 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 FIVE

(Possession with intent to distribute and distribution of fentanyl)

11. On or about September 3, 2020, in the District of Connecticut, the defendant YAN REYES, a.k.a. "Juan," knowingly and intentionally possessed with intent to distribute, and did distribute, a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

All 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)

12. On or about September 10, 2020, in the District of Connecticut, the defendant RAMON VARGAS knowingly and intentionally possessed with intent to distribute, and did distribute, a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

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

COUNT SEVEN

(Possession with intent to distribute and distribution of fentanyl)

13. On or about November 6, 2020, in the District of Connecticut, the defendant YAN REYES, a.k.a. "Juan," knowingly and intentionally possessed with intent to distribute, and did distribute, a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

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

COUNT EIGHT

(Possession with intent to distribute and distribution of fentanyl)

14. On or about March 30, 2021, in the District of Connecticut, the defendants YAN REYES, a.k.a. "Juan," and RAMON VARGAS knowingly and intentionally possessed with intent to distribute, and did distribute, a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

All 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 NINE

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

15. On or about August 20, 2020, in the District of Connecticut, the defendant JOHNATTAN FERNANDEZ-LOPEZ knowingly possessed a firearm, specifically, a Glock 23 .40 caliber semi-automatic pistol bearing serial number WPT360, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Conspiracy to Possess with Intent to Distribute Heroin, Fentanyl, Cocaine, Cocaine Base, and Oxycodone, and Possession with Intent to Distribute and Distribution of Fentanyl, in violation of Title 21, United States Code, Section 841(a)(1), 841(b)(1)(C), and 846 as charged in Counts One and Four of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT TEN

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

16. On or about May 18, 2021, in the District of Connecticut, the defendant RAY URENA, a.k.a. "Reuben," knowingly possessed a firearm, specifically, a Glock 23 .40 caliber semi-automatic pistol bearing serial number WPT360, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Conspiracy to Possess with

Intent to Distribute, and to Distribute, Heroin, Fentanyl, Cocaine, Cocaine Base, and Oxycodone, as charged in Count One of the Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

FORFEITURE ALLEGATION
(Controlled Substance Offense)

17. Upon conviction of one or more of the controlled substance offenses charged in Counts One through Eight of this Indictment, the defendant RAY URENA, WILMER ANGEL RUIZ-SERRANO, YAN REYES, RAMON VARGAS, JOHNATTAN FERNANDEZ-LOPZ, and JOSE LORA, 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 violation 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, this violation and a sum of money equal to the total amount of proceeds obtained as a result of the offense, including, but not limited to, the following items seized on or about May 18, 2021: (a) a Jimenez JA-22 semi-automatic pistol bearing serial number 1165499; (b) a Glock 23 .40 caliber semi-automatic pistol bearing serial number WPT360; and (c) approximately \$54,000 of United States currency; as well as approximately \$51,000 seized on or about December 20, 2020

18. If any of the above-described forfeitable property, as a result of any act or omission of the defendant, cannot be located upon the exercise of due diligence, has been transferred, sold to, or deposited with a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property that 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 defendant up to the value of the forfeitable property described above.

All in accordance with Title 21, United States Code, Sections 853 and 881, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION
(Firearm Offenses)

19. Upon conviction of Count Nine and/or Ten of this Indictment, the defendants RAY URENA and JOHNATTAN FERNANDEZ-LOPEZ 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 offense including, but not limited to, the following items seized on or about on or about May 18, 2021: (a) a Jimenez JA-22 semi-automatic pistol bearing serial number 1165499; and (b) a Glock 23 .40 caliber semi-automatic pistol bearing serial number WPT360.

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

A TRUE BILL


FOREPERSON


LEONARD C BOYLE
ACTING UNITED STATES ATTORNEY


JOHN T. PIERPONT, JR.
ASSISTANT UNITED STATES ATTORNEY


ANGEL KRULL
ASSISTANT UNITED STATES ATTORNEY