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U.S. DISTRICT COURT  
SAN JUAN, PR

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF PUERTO RICO**

**CRIMINAL NO. 13 - 896**

**VIOLATIONS:**

**Title 21, United States Code, Sections  
841(a)(1) and 841(b)(1)(A)(ii) and 846;**

**Title 21, United States Code, Sections  
952(a), 960(a)(1) & (b)(1)(B) and 963**

**Narcotics Forfeiture Allegation  
Title 21, United States Code, Sections  
853, 881 and Rule 32.2(a), F.R.C.P.**

**(FOUR COUNTS and ONE  
NARCOTICS FORFEITURE  
ALLEGATION)**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**[1] SERGIO ANTONIO CEPEDA-GUZMAN,  
[2] SANTOS ACEVEDO-SUERO,  
a/k/a "Santos Suero," "Paisa,"**

**Defendants.**

**INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**Conspiracy to Possess With Intent to Distribute Controlled Substances  
(Title 21, United States Code, Sections 846)**

From in or about the December 2013 and continuing up to on or about December 5, 2013,  
in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] SERGIO ANTONIO CEPEDA-GUZMAN,  
[2] SANTOS ACEVEDO-SUERO, a/k/a "Santos Suero," "Paisa,"**

the defendants herein, and diverse other persons unknown to the Grand Jury, did knowingly and  
intentionally combine, conspire, and agree with each other to commit an offense against the  
United States, to wit: to possess with intent to distribute **five (5) kilograms or more** of a mixture

or substance containing a detectable amount of **cocaine**, a Schedule II Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(ii).

**COUNT TWO**

**Possess with Intent to Distribute Controlled Substances  
(Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(ii))**

On or about December 5, 2013, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] SERGIO ANTONIO CEPEDA-GUZMAN,  
[2] SANTOS ACEVEDO-SUERO, a/k/a "Santos Suero," "Paisa,"**

the defendants herein, did knowingly and intentionally possess with the intent to distribute **five (5) kilograms or more** of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(ii).

**COUNT THREE**

**Conspiracy to Import Controlled Substances  
(Title 21, United States Code, Sections 952(a) & 963)**

From in or about the December 2013 and continuing up to on or about December 5, 2013, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] SERGIO ANTONIO CEPEDA-GUZMAN,  
[2] SANTOS ACEVEDO-SUERO, a/k/a "Santos Suero," "Paisa,"**

the defendants herein, and diverse other persons unknown to the Grand Jury, did knowingly and intentionally combine, conspire, and agree with each other to commit an offense against the United States, to wit: to import into the United States, from a place outside thereof, **five (5) kilograms or more** of a mixture or substance containing a detectable amount of **cocaine**, a

Schedule II Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, Sections 952(a) & 963.

**COUNT FOUR**  
**Importation of Controlled Substances**  
**(Title 21, United States Code, Sections 952(a), 960(a)(1) & (b)(1)(B))**

On or about December 5, 2013, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

**[1] SERGIO ANTONIO CEPEDA-GUZMAN,**  
**[2] SANTOS ACEVEDO-SUERO, a/k/a “Santos Suero,” “Paisa,”**

the defendants herein, did knowingly and intentionally import into the United States, from a place outside thereof, **five (5) kilograms or more** of a mixture or substance containing a detectable amount of **cocaine**, a Schedule II Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code, Sections 952(a), 960(a)(1) & (b)(1)(B).

**NARCOTICS FORFEITURE ALLEGATION**  
**(Title 21, United States Code, Sections 853 & 881)**

The allegations contained in Counts ONE through FOUR of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Sections 853 and 881.

Upon conviction of the offenses alleged in Counts ONE through FOUR of this Indictment, pursuant to Title 21, United States Code, Sections 853 and 881 and Rule 32.2(a) of the Federal Rules of Criminal Procedure:

**[1] SERGIO ANTONIO CEPEDA-GUZMAN,**  
**[2] SANTOS ACEVEDO-SUERO, a/k/a “Santos Suero,” “Paisa,”**

the defendants herein, shall forfeit to the United States the following property:

a. All rights, title, and interests in any and all property involved in the offense in violation of Title 21, United States Code, 841(a)(1) and 841(b)(1)(A)(ii), 846, 952(a), 960(a)(1) & (b)(1)(B) & 963; for which the defendants are convicted, and all property traceable to such property, including the following:

(1) All monies and/or property constituting, or derived from, proceeds obtained directly or indirectly, as a result of the offense;

(2) Money Judgement against the defendants for a sum of money representing the amount of proceeds obtained as a result of the offense(s); and,

(3) All property used in any manner, or part, to commit or to facilitate the commission of the offense(s).

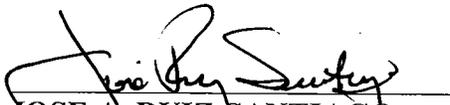
b. If any of the above-described forfeitable property, as a result of any act or omission of the defendants cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially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

***(INTENTIONALLY BLANK)***

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

**ROSA EMILIA RODRIGUEZ-VELEZ**  
UNITED STATES ATTORNEY

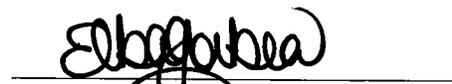
**TRUE BILL**

  
**JOSE A. RUIZ-SANTIAGO**  
Assistant United States Attorney  
Chief, Criminal Division

**FOREPERSON**

Dated: 12/18/13

  
**JENIFER Y. HERNANDEZ-VEGA**  
Assistant United States Attorney  
Deputy Chief, Narcotics Unit

  
**ELBA GORBEA**  
Assistant United States Attorney  
Narcotics Unit