

FILED
MAR 31 2015

U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

FRANCISCO JAVIER SANUDO,
JAIRO COLON,

Defendants.

) SECRET
) INDICTMENT
)

) JUDGE

) CASE NO.

) Title 21, Sections 841(a)(1), (b)(1)(A),
) (b)(1)(B) and 846, United States Code:
) Title 18, Section 2, United States Code
)
)

1 : 15 CR 123
JUDGE BOYKO

COUNT 1

The Grand Jury charges:

Beginning as early as February 1, 2015, and continuing through March 6, 2015, the exact dates to the Grand Jury unknown, in the Northern District of Ohio, Eastern Division, and elsewhere, FRANCISCO JAVIER SANUDO and JAIRO COLON, the defendants herein, and others known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree together and with each other, and with diverse others known and unknown to the Grand Jury, to possess with the intent to distribute and to distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and did conspire to possess with the intent to distribute and to

distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and 846.

COUNT 2

The Grand Jury further charges:

On or about March 2, 2015, in the Northern District of Ohio, Eastern Division, FRANCISCO JAVIER SANUDO and JAIRO COLON, the defendants herein, did knowingly and intentionally distribute approximately one kilogram of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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

COUNT 3

The Grand Jury further charges:

On or about March 4, 2015, in the Northern District of Ohio, Eastern Division, FRANCISCO JAVIER SANUDO and JAIRO COLON, the defendants herein, did knowingly and intentionally distribute approximately five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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

COUNT 4

The Grand Jury further charges:

On or about March 5, 2015, in the Northern District of Ohio, Eastern Division, FRANCISCO JAVIER SANUDO and JAIRO COLON, the defendants herein, did knowingly

and intentionally possess with the intent to distribute approximately 11 kilograms of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

COUNT 5

The Grand Jury further charges:

On or about March 5, 2015, in the Northern District of Ohio, Eastern Division, FRANCISCO JAVIER SANUDO and JAIRO COLON, the defendants herein, did knowingly and intentionally possess with the intent to distribute approximately 35 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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

FORFEITURE

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, the allegations of Counts 1 through 5 are incorporated herein by reference. As a result of the foregoing offenses, defendants FRANCISCO JAVIER SANUDO and JAIRO COLON, shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; and any and all of their property

used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; including but not limited to:

- a. \$400,655.00 in U.S. Currency, seized from Jairo Colon;
- b. \$10,000.00 in U.S. Currency, seized from Jairo Colon; and,
- c. \$7,400.00 in U.S. Currency, seized from Javier Sanudo.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.