

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

JOSHUA PEREZ, :

a/k/a "Link" :

JAVIER COLLAZO, :

HIRAM COLLAZO, :

a/k/a "Alex," :

NATALIE JUSINO, :

a/k/a "Papo" :

KEVIN MIESES, :

AMAURY MODESTO, :

ANDREW PEREZ, :

Defendants. :

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SEALED
INDICTMENT

17 Cr.

17 CRIM 251

COUNT ONE

The Grand Jury charges:

Background

1. The "MMOB" crew ("Moshulu Money Over Bitches") is a group of individuals engaged in narcotics trafficking in or around the Norwood section of the Bronx.

2. From at least in or about July 2016, up to and including in or about April 2017, in the Southern District of New York and elsewhere, JOSHUA PEREZ, a/k/a "Link"; JAVIER COLLAZO; HIRAM COLLAZO, a/k/a "Alex"; NATALIE JUSINO, a/k/a

"Papo;" KEVIN MIESES; AMAURY MODESTO, a/k/a "A"; and ANDREW PEREZ, (collectively, the "Defendants"), and others known and unknown, conspired to distribute significant amounts of narcotics, including crack cocaine, cocaine, Percocet tablets, and marijuana, in the Norwood section of the Bronx.

3. Members and associates of the crew and others working with them operated a drug trafficking organization (the "MMOB DTO"), which distributed narcotics on a daily basis.

4. The MMOB DTO controlled narcotics sales between Mosholu Parkway, West Gun Hill Road, and Jerome Avenue, on Gales Place and Knox Place, including by selling on street corners, in and around apartment buildings in that area, and making deliveries.

MEANS AND METHODS OF THE CONSPIRACY

5. Members of the MMOB DTO operated in concert to sell narcotics, employing the following means and methods, among others.

6. Members of the MMOB DTO fulfilled different roles within the DTO. Among other roles, certain of the Defendants regularly sold narcotics to retail customers in hand-to-hand drug transactions; other of the Defendants obtained wholesale supplies of drugs and handled the packaging of drugs into retail distribution packages; other of the Defendants managed the distribution of retail packages to the street-level sellers.

7. JOSHUA PEREZ, a/k/a "Link," the defendant, supervised members of the MMOB DTO and coordinated the supply of narcotics to other drug dealers in the MMOB DTO. JOSHUA PEREZ personally supplied narcotics to members of the MMOB DTO, including JAVIER COLLAZO, KEVIN MIESES, HIRAM COLLAZO a/k/a "Alex," NATALIE JUSINO, a/k/a "Papo," ANDREW PEREZ, and AMAURY MODESTO, a/k/a "A." For example, on or about March 9, 2017, ANDREW PEREZ asked JOSHUA PEREZ when JOSHUA PEREZ would resupply him, asking, in substance and in part, "Did you get the stuff, the white one?" JOSHUA PEREZ replied, in substance and in part, "I'm doing that right now . . . what I got right now is mad soft so is going down to powder so I'm trying to change it. . . ." JOSHUA PEREZ also took calls from customers with complaints about the narcotics his workers had sold, and referred customers to his workers.

8. The members of the DTO would also refer customers to one another when they did not have adequate supply to serve a customer. For example, on or about December 18, 2016, KEVIN MIESES, the defendant, told a customer asking for "six" baggies of crack cocaine, in substance and in part, "Nah, right now I don't even got nothing . . .right now . . . try to call Javi [JAVIER COLLAZO, the defendant] right now you heard?" JOSHUA PEREZ a/k/a "Link," the defendant, also arranged for other members of the MMOB DTO, including MIESES, to sell crack cocaine

on JOSHUA PEREZ's behalf. On or about February 8, 2017, a customer called JOSHUA PEREZ asking for "[t]wo" and JOSHUA PEREZ told her, in substance and in part, to "call Kev."

9. Other members of the MMOB DTO handled the day-to-day drug trafficking operations. For example, NATALIE JUSINO a/k/a "Papo," the defendant, kept track of the DTO's supply and counted the money remitted by workers for JOSHUA PEREZ a/k/a "Link," the defendant. HIRAM COLLAZO, a/k/a "Alex," carried out sales for JOSHUA PEREZ and JAVIER COLLAZO, the defendant. For example, on or about December 23, 2016, HIRAM COLLAZO called JAVIER COLLAZO to tell him, in substance and in part, that he had found someone who wanted to purchase prescription pills that JAVIER COLLAZO had available for sale.

10. MMOB DTO members also worked together to further their narcotics trafficking operation by helping one another evade detection by law enforcement. For example, on or about January 3, 2017, after uniformed police officers had come to the apartment of AMAURY MODESTO a/k/a "A," the defendant, MODESTO called JAVIER COLLAZO, the defendant, asking, in substance and in part, for JAVIER COLLAZO to help him recover items that he had thrown out the window before law enforcement could discover them. JAVIER COLLAZO, in turn, coordinated with other members of the MMOB DTO to recover the bag, and agreed to send someone from the DTO to recover the bag.

STATUTORY ALLEGATIONS

11. From at least in or about July 2016, up to and including in or about April 2017, in the Southern District of New York and elsewhere, JOSHUA PEREZ a/k/a "Link," JAVIER COLLAZO, HIRAM COLLAZO a/k/a "Alex," NATALIE JUSINO a/k/a "Papo," KEVIN MIESES, AMAURY MODESTO a/k/a "A," and ANDREW PEREZ, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree, together and with each other, to violate the narcotics laws of the United States.

12. It was a part and an object of the conspiracy that JOSHUA PEREZ a/k/a "Link," JAVIER COLLAZO, HIRAM COLLAZO a/k/a "Alex," NATALIE JUSINO a/k/a "Papo," KEVIN MIESES, AMAURY MODESTO a/k/a "A," and ANDREW PEREZ, the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

13. The controlled substances that JOSHUA PEREZ a/k/a "Link," JAVIER COLLAZO, HIRAM COLLAZO a/k/a "Alex," NATALIE JUSINO a/k/a "Papo," and KEVIN MIESES, conspired to distribute and possess with the intent to distribute were: (i) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A);

and (ii) a quantity of mixtures and substances containing marijuana, in violation of Title 21, United States Code, Section 841(b) (1) (D).

14. The controlled substance that JOSHUA PEREZ a/k/a "Link," ANDREW PEREZ, KEVIN MIESES, NATALIE JUSINO, and AMAURY MODESTO conspired to distribute and possess with the intent to distribute was 500 grams and more of mixtures and substances containing cocaine, in violation of Title 21, United States Code, Section 841(b) (1) (B).

15. The controlled substance that JOSHUA PEREZ, NATALIE JUSINO, HIRAM COLLAZO a/k/a "Alex," and JAVIER COLLAZO, the defendants, conspired to distribute and possess with the intent to distribute was a detectable amount of oxycodone, in the form of Percocet tablets, in violation of 841(b) (1) (C).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

16. As a result of committing the controlled substance offense alleged in Count One of this Indictment, JOSHUA PEREZ a/k/a "Link," JAVIER COLLAZO, HIRAM COLLAZO a/k/a "Alex," NATALIE JUSINO a/k/a "Papo," KEVIN MIESES, AMAURY MODESTO a/k/a "A," and ANDREW PEREZ, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting and derived from any proceeds the defendants obtained directly or

indirectly as a result of the offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense.

SUBSTITUTE ASSET PROVISION

17. If any of the above described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

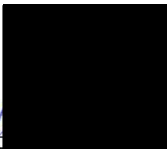
(b) has been transferred or sold to, or deposited with, a third person;

(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 which cannot be subdivided without difficulty; pursuant to Title 21, United States Code, Section 853(p), it is the intent of the United States, to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)



FOREPERSON



JOON H. KIM
Acting United States Attorney

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(21 U.S.C. § 846.)

JOON H. KIM
Acting United States Attorney.

A TRUE BILL



Foreperson.