

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No.
 :
 v. : INDICTMENT
 :
 MAURICIO JARAMILLO, : 21 U.S.C. §§ 846 & 963
 PABLO ROJAS, and :
 HERIBERTO SANTOS :

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges:

COUNT 1

1. At all times pertinent to this Indictment, Mauricio Jaramillo and Pablo Rojas were organizers and leaders of a criminal activity that involved five or more participants and was otherwise extensive within the meaning of U.S.S.G. § 3B1.1(a).

2. In or about January 2004, in Passaic County, in the District of New Jersey, and elsewhere, the defendants,

MAURICIO JARAMILLO,
PABLO ROJAS, and
HERIBERTO SANTOS,

did knowingly and intentionally conspire and agree with each other and with others to import into the United States from a place outside thereof, namely Colombia and Mexico, approximately 2,071 kilograms of cocaine, a Schedule II narcotic drug controlled substance, contrary to Title 21, United States Code, Sections 952 and 960(a)(1) and (b)(1).

In violation of Title 21, United States Code, Section 963.

COUNT 2

1. Paragraph 1 of Count 1 is incorporated herein as if set forth in full.

2. In or about January 2004, in Passaic County, in the District of New Jersey, and elsewhere, the defendants,

MAURICIO JARAMILLO,
PABLO ROJAS, and
HERIBERTO SANTOS,

did knowingly and intentionally conspire and agree with each other and with others to distribute and to possess with intent to distribute approximately 2,071 kilograms of cocaine, a Schedule II narcotic drug controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

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

A TRUE BILL

FOREPERSON

CHRISTOPHER J. CHRISTIE
United States Attorney