

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>EDWIN RAMIREZ, JONATHAN MOYA, and CARLOS GARCIA, a/k/a “Gordo”</b>	<b>:</b>	<b>VIOLATION: 21 U.S.C. § 846 (Conspiracy to distribute and possess with intent to distribute cocaine - 1 count) 21 U.S.C. § 841(a)(1) (Distribution of cocaine - 2 counts) 21 U.S.C. § 841(a)(1) (Possession with intent to distribute cocaine - 1 count) 18 U.S.C. § 2 (Aiding &amp; abetting - 2 counts)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

From in or about July, 2002, through on or about August 22, 2002, at Allentown, Pennsylvania, in the Eastern District of Pennsylvania, and elsewhere, the defendants

**EDWIN RAMIREZ,  
JONATHAN MOYA, and  
CARLOS GARCIA, a/k/a “Gordo”**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute approximately 495.46 grams of a mixture and substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

## MANNER AND MEANS

1. It was part of the conspiracy that defendants EDWIN RAMIREZ, JONATHAN MOYA, and CARLOS GARCIA possessed with intent to distribute approximately 495.46 grams of a mixture or substance containing cocaine, in Allentown, in the Eastern District of Pennsylvania, and elsewhere.

It was further a part of the conspiracy that:

2. Defendant EDWIN RAMIREZ used his cocaine supply contacts in Florida and traveled to Florida to purchase and bring back quantities of cocaine for distribution in Allentown. Defendants JONATHAN MOYA and CARLOS GARCIA, assisted RAMIREZ to make these trips.

3. Defendants EDWIN RAMIREZ, JONATHAN MOYA and CARLOS GARCIA delivered quantities of cocaine to customers and collected money for those cocaine sales.

4. Defendants JONATHAN MOYA and CARLOS GARCIA wired money to EDWIN RAMIREZ for the purpose of purchasing quantities of cocaine for distribution in the Eastern District of Pennsylvania and elsewhere.

5. Defendants EDWIN RAMIREZ, JONATHAN MOYA, and CARLOS GARCIA, and others known and unknown to the grand jury, used telephones to facilitate the possession with intent to distribute and distribution of cocaine in the Eastern District of Pennsylvania, and elsewhere.

6. Defendants EDWIN RAMIREZ, JONATHAN MOYA and CARLOS GARCIA leased and maintained an apartment in Allentown, Pennsylvania, to store quantities of cocaine for distribution.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objectives, the following overt acts, among others, were committed by the defendants in the Eastern District of Pennsylvania, and elsewhere:

1. On or about July 29, 2002, defendant EDWIN RAMIREZ met with a person known to the grand jury (hereafter "CW") in Allentown, Pennsylvania, and sold approximately one ounce (27.7 grams) of cocaine. CW paid RAMIREZ \$960 for the cocaine.

2. On or about August 4, 2002, defendants EDWIN RAMIREZ and JONATHAN MOYA met with CW in Allentown, Pennsylvania, and told CW that RAMIREZ was going to Florida to obtain a multi-kilogram quantities of cocaine to resell. RAMIREZ and MOYA discussed selling quantities of cocaine to CW and the price for the cocaine.

3. On or about August 4, 2002, defendants EDWIN RAMIREZ, JONATHAN MOYA and CARLOS GARCIA met in Allentown, Pennsylvania, and discussed selling amounts of cocaine and how MOYA and GARCIA were to wire money to RAMIREZ while he was in Florida.

4. On or about August 21, 2002, in Allentown, Pennsylvania, defendant EDWIN RAMIREZ spoke to CW about selling the CW a quantity of cocaine. RAMIREZ told the CW to pick up the cocaine later that day from defendant CARLOS GARCIA.

5. On or about August 21, 2002, defendant CARLOS GARCIA sold approximately 7.3 grams of cocaine to the CW inside an apartment at 913 Tilghman Street, Allentown, Pennsylvania, which sale had previously been approved by defendant EDWIN RAMIREZ. The CW paid \$200 to GARCIA for the cocaine.

6. On or about August 21 and 22, 2002, defendants EDWIN RAMIREZ, JONATHAN MOYA, and CARLOS GARCIA possessed with intent to distribute approximately 460.46 grams of cocaine inside an apartment at 913 Tilghman Street, Allentown, Pennsylvania.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 29, 2002, at Allentown, in the Eastern District of Pennsylvania,  
defendant

**EDWIN RAMIREZ**

did knowingly and intentionally distribute, and aid and abet the distribution of, approximately 27.7  
grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II  
controlled substance.

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**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 21, 2002, at Allentown, in the Eastern District of Pennsylvania,  
defendants

**EDWIN RAMIREZ,  
JONATHAN MOYA, and  
CARLOS GARCIA, a/k/a “Gordo”**

did knowingly and intentionally distribute, and aid and abet the distribution of, approximately 7.3  
grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II  
controlled substance.

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 FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 21 and 22, 2002, at Allentown, in the Eastern District of Pennsylvania, defendants

**EDWIN RAMIREZ,  
JONATHAN MOYA, and  
CARLOS GARCIA, a/k/a “Gordo”**

did knowingly and intentionally possess with intent to distribute, and aid and abet the possession with intent to distribute of, approximately 460.46 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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.

***A TRUE BILL:***

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**