

*Filed 3/22/18
2:28p.m.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Crim. No. 18-_____
	:	
v.	:	21 U.S.C. § 841
	:	21 U.S.C. § 846
ILEANA SANCHEZ,	:	
a/k/a "Lilly,"	:	
a/k/a "Mami"	:	

INDICTMENT

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

COUNT ONE

(Conspiracy to Distribute and Possess With Intent to
Distribute 100 Grams or More of Heroin)

1. At all times relevant to Count One of this Indictment:

a. The defendant, ILEANA SANCHEZ, a/k/a "Lilly,"

a/k/a "Mami," resided in or around Trenton, New Jersey, and was engaged in
the distribution of heroin for profit.

b. Co-conspirator JOSE JOAQUIN TORRES-MEZQUITA,

a/k/a "Alex," a/k/a "Papi," a/k/a "Pop," a/k/a "Pa" (hereafter, "TORRES"),
resided in or around Philadelphia, Pennsylvania, and was in engaged in the
distribution of heroin for profit.

c. Co-conspirator ISHMAEL ABDULLAH, a/k/a "Ish,"

a/k/a "Gangsta," a/k/a "Pop," resided in or around Trenton, New Jersey, and
was engaged in the distribution of heroin for profit. ISHMAEL ABDULLAH was
the leader of a drug-trafficking organization, hereafter referred to as

the “Abdullah DTO,” which was engaged in, among other things, the distribution of heroin for profit in and around Trenton, New Jersey.

d. Co-conspirator KEITH HUNTER, a/k/a “Meech,” resided in or around Trenton, New Jersey, and was engaged in the distribution of heroin for profit. HUNTER was a member of the Abdullah DTO.

e. Co-conspirator BERNADINO GUERVIL, a/k/a “BG,” resided in or around Trenton, New Jersey, and was engaged in the distribution of heroin for profit. GUERVIL was a member of the Abdullah DTO.

f. Co-conspirator ELIJAH ABDULLAH, a/k/a “Uncle E,” a/k/a “E,” resided in or around Trenton, New Jersey, and was engaged in the distribution of heroin for profit. ELIJAH ABDULLAH was co-conspirator ISHMAEL ABDULLAH’s younger brother and was a member of the Abdullah DTO.

2. From in or about July 2015 to in or about December 2016, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

ILEANA SANCHEZ,
a/k/a “Lilly,”
a/k/a “Mami,”

did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute one hundred grams or more of a mixture and substance containing a detectible amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

OBJECT OF THE CONSPIRACY

3. The object of the conspiracy was to distribute and possess with intent to distribute heroin for profit in and around Trenton, New Jersey, and elsewhere.

MANNER AND MEANS OF THE CONSPIRACY

4. The manner and means by which defendant SANCHEZ and her co-conspirators sought to accomplish the conspiracy included, among other things, the following:

a. It was part of the conspiracy that defendant SANCHEZ and co-conspirator TORRES supplied heroin to members of the Abdullah DTO, including co-conspirators ISHMAEL ABDULLAH, GUERVIL, and ELIJAH ABDULLAH.

b. It further was part of the conspiracy that, when supplying co-conspirator ISHMAEL ABDULLAH and other members of the Abdullah DTO with heroin, defendant SANCHEZ and co-conspirator TORRES often would “front” the supplies—meaning not require immediate payment—to co-conspirator ABDULLAH and other members of the Abdullah DTO.

c. It further was part of the conspiracy that, to identify and differentiate various supplies of heroin, defendant SANCHEZ and co-conspirator TORRES sold heroin to the Abdullah DTO that was contained in packaging bearing ink stamps. During the conspiracy, members of the Abdullah DTO discussed packages of heroin that defendant SANCHEZ supplied that had ink stamps that read, for example, “POKEMON” and “HOT SAUCE.”

d. It further was part of the conspiracy that, after defendant SANCHEZ or co-conspirator TORRES supplied the heroin, members of the Abdullah DTO would re-sell that heroin, for profit, to other drug dealers and end users in and around Trenton, New Jersey.

e. It further was part of the conspiracy that, after members of the Abdullah DTO re-sold the heroin that defendant SANCHEZ or co-conspirator TORRES had supplied, defendant SANCHEZ or co-conspirator TORRES would seek to collect the money owed to them for the supplies of heroin that they had “fronted” to the Abdullah DTO.

f. It further was part of the conspiracy that members of the conspiracy, including defendant SANCHEZ, used cellular telephones to coordinate narcotics transactions and otherwise to communicate with other members of the conspiracy, in furtherance of the conspiracy’s unlawful drug-trafficking activities.

g. It further was part of the conspiracy that defendant SANCHEZ communicated with co-conspirator ISHMAEL ABDULLAH regarding unlawful drug-trafficking activities using an online social media application.

h. It further was part of the conspiracy that on multiple occasions between in or about August 2016 and in or about November 2016, defendant SANCHEZ supplied quantities of heroin to members of the Abdullah DTO. For example:

(i) Between on or about September 20, 2016 and on or about September 22, 2016, defendant SANCHEZ supplied a quantity of heroin

to co-conspirator GUERVIL, who acted on behalf of the Abdullah DTO and in consultation with co-conspirator ISHMAEL ABDULLAH.

(ii) Between on or about September 22, 2016 and on or about September 23, 2016, defendant SANCHEZ supplied a quantity of heroin to co-conspirator GUERVIL, who acted on behalf of the Abdullah DTO and in consultation with co-conspirator ISHMAEL ABDULLAH.

(iii) On or about October 18, 2016, defendant SANCHEZ supplied a quantity of heroin to co-conspirator ELIJAH ABDULLAH, who acted on behalf of the Abdullah DTO and at the direction of co-conspirator ISHMAEL ABDULLAH.

i. It further was part of the conspiracy that members of the Abdullah DTO, including co-conspirators ISHMAEL ABDULLAH, ELIJAH ABDULLAH, KEITH HUNTER, and BERNADINO GUERVIL, discussed the quality and popularity of the heroin that defendant SANCHEZ had supplied to the organization.

j. It further was part of the conspiracy that, on or about December 8, 2016, defendant SANCHEZ possessed with intent to distribute a quantity of heroin that was packaged in a manner consistent with distribution.

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

COUNT TWO

(Distribution and Possession With Intent to Distribute Heroin)

1. Paragraphs 1(a), 1(c), 1(e), and 4(h)(i) of Count One are realleged and incorporated by reference as though fully set forth in this Count.

2. Between on or about September 20, 2016 and on or about September 22, 2016, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

ILEANA SANCHEZ,
a/k/a "Lilly,"
a/k/a "Mami,"

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectible amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT THREE

(Distribution and Possession With Intent to Distribute Heroin)

1. Paragraphs 1(a), 1(c), 1(e), and 4(h)(ii) of Count One are realleged and incorporated by reference as though fully set forth in this Count.

2. Between on or about September 22, 2016 and on or about September 23, 2016, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

ILEANA SANCHEZ,
a/k/a "Lilly,"
a/k/a "Mami,"

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectible amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FOUR

(Distribution and Possession With Intent to Distribute Heroin)

1. Paragraphs 1(a), 1(c), 1(f), and 4(h)(iii) of Count One are realleged and incorporated by reference as though fully set forth in this Count.
2. On or about October 18, 2016, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

ILEANA SANCHEZ,
a/k/a "Lilly,"
a/k/a "Mami,"

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectible amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FIVE

(Possession With Intent to Distribute Heroin)

1. Paragraphs 1(a) and 4(j) of Count One are realleged and incorporated by reference as though fully set forth in this Count.

2. On or about December 8, 2016, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

ILEANA SANCHEZ,
a/k/a "Lilly,"
a/k/a "Mami,"

did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectible amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE ALLEGATION

1. The allegations contained in Counts One through Five of this Indictment are incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853.

2. Upon conviction of the offenses set forth in this Indictment, the defendant,

ILEANA SANCHEZ,
a/k/a "Lilly,"
a/k/a "Mami,"

shall forfeit to the United States any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violation 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 violations alleged in this Indictment, including but not limited to the following:

- (a) a silver 2008 Mercedes Benz 550, License Plate Number K16GFN, bearing vehicle identification number WDDDJ72X98A128251.

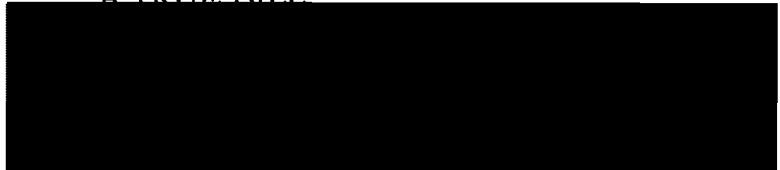
Substitute Assets Provision

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:


- (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;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A TRUE BILL



FOREPERSON


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 18-cr-_____

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

ILEANA SANCHEZ
a/k/a "Lilly"
a/k/a "Mami"

INDICTMENT FOR
21 U.S.C. § 841
21 U.S.C. § 846

A True Bill,


Foreperson

CRAIG CARPENITO
*UNITED STATES ATTORNEY
NEWARK, NEW JERSEY*

*J. BRENDAN DAY
ASSISTANT UNITED STATES ATTORNEY
TRENTON, NEW JERSEY*
