UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

WANDER ROSARIO, a/k/a "Wandy,"
WANDER DELACRUZ, a/k/a "Charlie,"
ALEXIS DE ROSA, a/k/a "Surf," and
KELVIN JIMENEZ MARTINEZ,

Defendants.

26 CRIM 540

SEALED INDICTMENT

26 Cr.

COUNT ONE
(Conspiracy to Distribute Narcotics)

The Grand Jury charges:

1. From at least in and around February 2026, up to and including the date of the filing of this Indictment, in the Southern District of New York and elsewhere, WANDER ROSARIO, a/k/a "Wandy," WANDER DELACRUZ, a/k/a "Charlie," ALEXIS DE ROSA, a/k/a "Surf," and KELVIN JIMENEZ MARTINEZ, the defendants, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.

2. It was a part and an object of the conspiracy that WANDER ROSARIO, a/k/a "Wandy," WANDER DELACRUZ, a/k/a "Charlie," ALEXIS DE ROSA, a/k/a "Surf," and KELVIN JIMENEZ MARTINEZ, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances involved in the offense were: (i) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United

States Code, Section 841(b)(1)(A); (ii) mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (iii) mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(C).

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

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Indictment, WANDER ROSARIO, a/k/a "Wandy," WANDER DELACRUZ, a/k/a "Charlie," ALEXIS DE ROSA, a/k/a "Surf," and KELVIN JIMENEZ MARTINEZ, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

5. 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 Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

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

[redacted]
FOREPERSON

JAMES M. MCDONALD
United States Attorney