

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

2021 MAY 6 PM 2:18

UNITED STATES OF AMERICA

v.

[1] FÉLIX VERDEJO-SÁNCHEZ,
[2] LUIS ANTONIO CÁDIZ-
MARTÍNEZ,

Defendants.

INDICTMENT

Criminal No. 21- 101 (PAD)

Violations:

- 18 U.S.C. § 2119(3)
- 18 U.S.C. § 1201(a)(1)
- 18 U.S.C. § 924(c)(1)(a)(i)
- 18 U.S.C. § 1841
- 18 U.S.C. § 2

FOUR COUNTS

THE GRAND JURY CHARGES:

COUNT ONE

Carjacking Resulting in Death

(Title 18, United States Code, Sections 2119(3) and 2)

On or about April 29, 2021, in the District of Puerto Rico and within the jurisdiction of this Court,

[1] FÉLIX VERDEJO-SÁNCHEZ and
[2] LUIS ANTONIO CÁDIZ-MARTÍNEZ,

the defendants herein, aiding and abetting each other, with the intent to cause death or serious bodily harm, did take a motor vehicle from the person or presence of K.R.O. that is, a 2016 Kia Forte, a vehicle that had been transported, shipped or received in interstate or foreign commerce, by force, violence and intimidation, resulting in death to K.R.O. All in violation of Title 18, United States Code, Sections 2119(3) and 2.

COUNT TWO
Kidnapping Resulting in Death
(Title 18, United States Code, Sections 1201(a)(1) and 2)

On or about April 29, 2021, in the District of Puerto Rico and within the jurisdiction of this Court,

[1] FÉLIX VERDEJO-SÁNCHEZ and
[2] LUIS ANTONIO CÁDIZ-MARTÍNEZ,

the defendants herein, aiding and abetting each other, did unlawfully and willfully seize, confine, kidnap and abduct, and otherwise hold, K.R.O., resulting in her death. In committing or in furtherance of the commission of the kidnapping, the defendants used a means, facility, and instrumentality of interstate or foreign commerce, namely a Dodge Durango and cellular telephones. All in violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

COUNT THREE
Using and Carrying a Firearm
During and in Relation to a Crime of Violence
(Title 18, United States Code, Sections 924(c)(1)(A)(i))

On or about April 29, 2021, in the District of Puerto Rico and within the jurisdiction of this Court,

FÉLIX VERDEJO-SÁNCHEZ

did knowingly use and carry a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Title 18, United States Code, Section 1201(a)(1) (resulting in death) and Title 18, United States Code, Section 2119(3). All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT FOUR
Killing an Unborn Child
(Title 18, United States Code, Sections 1841 and 2)

On or about April 29, 2021, in the District of Puerto Rico and within the jurisdiction of this Court,

[1] FÉLIX VERDEJO-SÁNCHEZ and
[2] LUIS ANTONIO CÁDIZ-MARTÍNEZ,

the defendants herein, aiding and abetting each other, did commit the kidnapping and carjacking described in Counts Two and Three and intentionally caused the death of a child in utero. All in violation of Title 18, United States Code, Sections 1841 and 2.

NOTICE OF SPECIAL FINDINGS FOR COUNTS ONE AND TWO

[1] FÉLIX VERDEJO-SÁNCHEZ and
[2] LUIS ANTONIO CÁDIZ-MARTÍNEZ

1. Counts One and Two of this Indictment are re-alleged.
2. It is further alleged that:
 - a. Each defendant was at least eighteen years old at the time of the offense. (18 U.S.C. § 3591(a))
 - b. Each defendant intentionally killed K.R.O. (18 U.S.C. § 3591(a)(2)(A))
 - c. Each defendant intentionally inflicted serious bodily injury that resulted in the death of K.R.O. (18 U.S.C. § 3591(a)(2)(B))
 - d. Each defendant intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and K.R.O. died as a direct result of the act. (18 U.S.C. § 3591(a)(2)(C))

- e. Each defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to K.R.O., such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act. (18 U.S.C. § 3591(a)(2)(D))
- f. For each defendant, the death, or injury resulting in death, occurred during the commission of a kidnapping of K.R.O. (18 U.S.C. § 3592(c)(1))
- g. Each defendant committed the offense in an especially heinous, cruel, or depraved manner in that it involved serious physical abuse to K.R.O. (18 U.S.C. § 3592(c)(6))
- h. Each defendant committed the offense after substantial planning and premeditation to cause the death of K.R.O. (18 U.S.C. § 3592(c)(9))
- i. Félix Verdejo Sánchez procured the commission of the offense by payment, or promise of payment, of anything of pecuniary value. (18 U.S.C. § 3592(c)(7))

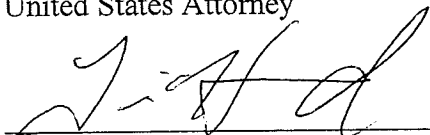
- j. Luis Antonio Cádiz-Martínez committed the offense as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value. (18 U.S.C. § 3592(c)(8))

TRUE BILL

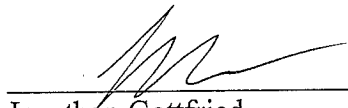
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Date: May 6 2021

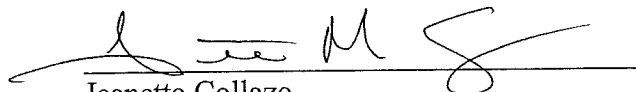
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