

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

UNITED STATES OF AMERICA

Plaintiff,

v.

[2] EDWIN YADIEL FLORES TAVAREZ,

Defendant.

CRIMINAL NO. 24-133 (CVR)

**UNITED STATES OF AMERICA'S NOTICE OF
INTENT TO SEEK A SENTENCE OF DEATH AGAINST
DEFENDANT [2] EDWIN YADIEL FLORES TAVAREZ**

Pursuant to Title 18, United States Code, Section 3593, the United States of America hereby notifies the Court and the defendant, Edwin Yadiel Flores Tavarez, and his counsel, that the United States believes that the circumstances of the offense charged in Count One of the Superseding Indictment are such that, in the event of a conviction, a sentence of death is justified under Sections 3591 through 3598 of Title 18 of the United States Code, and that the United States will seek the sentence of death for these offenses: kidnapping resulting in death in violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

The United States proposes to prove the following factors as justifying a sentence of death with regard to that count:

- A. Edwin Yadiel Flores Tavarez was 18 years of age or older at the time of the offense.
- B. Statutory Threshold Factors Enumerated under Title 18, United States Code, Section 3591(a)(2)(A)-(D):
 1. Edwin Yadiel Flores Tavarez intentionally killed T.D.C. and N.R.L. (Title 18, United States Code, Section 3591(a)(2)(A)).

2. Edwin Yadiel Flores Tavarez intentionally inflicted serious bodily injury that resulted in the death of T.D.C. and N.R.L. (Title 18, United States Code, Section 3591(a)(2)(B)).
3. Edwin Yadiel Flores Tavarez intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and T.D.C. and N.R.L. died as a direct result of the act. (Title 18, United States Code, Section 3591(a)(2)(C)).
4. Edwin Yadiel Flores Tavarez intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life, and T.D.C. and N.R.L. died as a direct result of the act. (Title 18, United States Code, Section 3591(a)(2)(D)).

C. Statutory Aggravating Factors Enumerated under Title 18, United States Code, Section 3592(c):

1. The deaths of T.D.C. and N.R.L. occurred during the commission of an offense under Section 1201 (kidnapping). (Title 18, United States Code, Section 3592(c)(1)).
2. The victims T.D.C. and N.R.L. were particularly vulnerable due to their youth. (Title 18, United States Code, Section 3592(c)(11)).

3. Edwin Yadiel Flores Tavarez intentionally killed more than one person in a single criminal episode. (Title 18, United States Code, Section 3592(c)(16)).

D. Additional Aggravating Factors Authorized under Title 18, United States Code, Sections 3592(c) and 3593(a)(2):

1. Edwin Yadiel Flores Tavarez killed T.D.C. and N.R.I. with the intent to prevent the victims from providing information and assistance to law enforcement authorities in regard to the investigation and prosecution of another offense or offenses, including but not limited to drug trafficking and/or attempted drug trafficking.
2. Edwin Yadiel Flores Tavarez caused injury, harm, and loss to the family and friends of T.D.C. and N.R.I. The injury, harm, and loss caused by Edwin Yadiel Flores Tavarez with respect to each victim is evidenced by each victim's personal characteristics and by the impact of that victim's death upon her family and friends.
3. Edwin Yadiel Flores Tavarez killed T.D.C. and N.R.I. after substantial planning and premeditation to cause the victims' deaths.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, on November 14, 2025.

/s/ W. Stephen Muldrow
W. Stephen Muldrow
United States Attorney

/s/ Julian N. Radzinschi
Julian N. Radzinschi
USDC # G0417
Assistant United States Attorney
United States Attorney's Office
Torre Chardón, Suite 1201
350 Carlos Chardón Street
San Juan, Puerto Rico 00918
Email: julian.radzinschi@usdoj.gov
Tel. (787) 766-5656

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/ Julian N. Radzinschi
Julian N. Radzinschi
USDC # G0417
Assistant United States Attorney