

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**INDICTMENT FOR VIOLATIONS OF  
THE FEDERAL CONTROLLED SUBSTANCES ACT**

UNITED STATES OF AMERICA

\*

CRIMINAL DOCKET NO.

v.

\*

SECTION:

GUILLERMO VALDOVINOS CRUZ

\*

VIOLATION: 21 U.S.C. § 841(a)(1)

FIDELIS LEWIS

\*

21 U.S.C. § 846

a/k/a Lewis Fidelis

\* \* \*

The Grand Jury charges that:

**COUNT 1**

Beginning at a time unknown and continuing until on or about October 12, 2010, in the Eastern District of Louisiana, and elsewhere, the defendants, **GUILLERMO VALDOVINOS CRUZ** and **FIDELIS LEWIS a/k/a Lewis Fidelis**, did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute one kilogram or more of mixture or substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

## COUNT 2

On or about October 12, 2010, in the Eastern District of Louisiana, the defendants, **GUILLERMO VALDOVINOS CRUZ** and **FIDELIS LEWIS a/k/a Lewis Fidelis**, did knowingly and intentionally possess with intent to distribute one kilogram or more of mixture or substance containing a detectable amount of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

### NOTICE OF FORFEITURE

1. The allegations of Counts 1 and 2 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of the offense alleged in Counts 1 and 2, **GUILLERMO VALDOVINOS CRUZ** and **FIDELIS LEWIS a/k/a Lewis Fidelis**, 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 the defendant obtained directly or indirectly as a result of the said violations 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 Counts 1 and 2 of this Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant(s):

- 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 said defendant up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
JAMES B. LETTEN  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
JAN MASELLI MANN  
First Assistant United States Attorney  
Chief, Criminal Division

  
\_\_\_\_\_  
KEVIN G. BOITMANN  
Assistant United States Attorney

New Orleans, Louisiana  
October 21, 2010