

SEALED

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FILED IN OPEN COURT,

OCT 8 2020

Holding a Criminal Term

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

Grand Jury Sworn on December 6, 2019

UNITED STATES OF AMERICA

v.

JUAN CARLOS VALENCIA-GONZALEZ,
also known as "Pelon," "Tricky Tres," "O3," "El
3," "JP," and "Pelacas,"

Defendant.

) CRIMINAL NO. _____
)
)

) UNDER SEAL
)
)

) 21 U.S.C. §§ 959, 960, 963
) (Conspiracy to Manufacture and
) Distribute Five Kilograms or More
) of Cocaine and Five Hundred
) Grams or More of
) Methamphetamine for Importation
) into the United States)
)
)

) 18 U.S.C. § 924(c)(1)(A)(i)
) (Carrying, Using, and Possessing a
) Firearm in Relation to a Drug
) Offense)
)
)

) 21 U.S.C. § 853 and § 970
) (Criminal Forfeiture)
)
)
)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Case No. 20-cr-216
Assigned to: Chief Judge Beryl A. Howell
Assign Date: 10/08/2020
Description: INDICTMENT (B)
Case Related to 14-cr-51 (BAH)

Beginning in and around January 2007 and continuing thereafter, up to and including the date of the filing of this Indictment, both dates being approximate and inclusive, in the countries of Mexico, the United States and elsewhere, the Defendant, **JUAN CARLOS VALENCIA-GONZALEZ, also known as "Pelon," "Tricky Tres," "O3," "El 3," "JP," and "Pelacas,"** together with others, both known and unknown to the Grand Jury, did knowingly, intentionally, and willfully combine, conspire, confederate and agree to manufacture and distribute five (5)

kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and five hundred (500) grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, intending, knowing, and having reasonable cause to believe that such substances would be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959(a) and 960, all in violation of Title 21, United States Code, Section 963.

With respect to the Defendant, the controlled substances involved in the conspiracy attributable to the Defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine and five hundred (500) grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 960(b)(1)(B)(ii) and 960(b)(1)(H).

(Conspiracy to Manufacture and Distribute Five Kilograms or More of Cocaine and 500 Grams or More of Methamphetamine, Intending, Knowing, and Having Reasonable Cause to Believe That Such Substances Would be Unlawfully Imported into the United States, in violation of Title 21, United States Code, Sections 959(a), 960(b)(1)(B)(ii), 960(b)(1)(H) and 963.)

COUNT TWO

From in or about August 2013, and continuing thereafter, up to and including the date of the filing of this Indictment, both dates being approximate and inclusive, the defendant **JUAN CARLOS VALENCIA-GONZALEZ**, also known as “Pelon,” “Tricky Tres,” “O3,” “El 3,” “JP,” and “Pelacas,” did knowingly and intentionally use, and carry one or more firearms, during and in relation to one or more drug trafficking crimes, to wit: the crime charged in Count One, and did knowingly and intentionally possess such firearms, in furtherance of said drug trafficking crimes, one or more of which

firearms was a machinegun, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(B)(ii), and 2.

(Use and Possession of a Firearm, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and (c)(1)(B)(ii), and Aiding and Abetting, in violation of Title 18, United States Code, Section 2.)

CRIMINAL FORFEITURE ALLEGATION

The United States hereby gives notice to the Defendant that upon conviction of the Title 21 offenses alleged in Count One of this Indictment, the Government will seek forfeiture in accordance with Title 21, United States Code, Sections 853 and 970, of all property constituting or derived from any proceeds the Defendant obtained directly or indirectly as the result of the Title 21 violations alleged in Count One, and all property used or intended to be used in any manner or part to commit, and to facilitate the commission of such offenses.

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;

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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 Defendants up to the value of the above forfeitable property.

(Criminal Forfeiture, in violation of Title 21, United States Code, Sections 853 and 970.)

A TRUE BILL:



Foreperson

Arthur Wyatt, FORK:

ARTHUR WYATT
Chief
Narcotic and Dangerous Drug Section
Criminal Division
U.S. Department of Justice,
Washington, D.C. 20530

By: Kirk Handrich

KIRK HANDRICH
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U.S. District and Bankruptcy Courts
for the District of Columbia
A TRUE COPY
ANGELA D. CAESAR, Clerk
Angela D. Caesar
Deputy Clerk