

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
* November 9, 2022 *
BROOKLYN OFFICE

EDP:ADW
F. #2022R00017

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

Judge Chen
Magistrate Judge Mann

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

Cr. No. 22-CR-513
(T. 21, U.S.C., §§ 853(a), 853(p), 959(a),
959(d), 960(a)(3), 960(b)(1)(B)(ii), 963
and 970; T. 18, U.S.C., §§ 2, 3238 and
3551 et seq.)

CESAR VALENCIA GARCIA,
also known as "Chucho"
and "Peludo,"
DIEGO BELTRAN ALVAREZ,
also known as "Chili,"
OSCAR VALENCIA FLOREZ,
also known as "Way,"
ALEXANDER VALENCIA GARCIA,
also known as "Alex," and
JHONATAN SAMBONI RUIZ,
also known as "Tayson,"

Defendants.

----- X

THE GRAND JURY CHARGES:

COUNT ONE

(International Cocaine Distribution Conspiracy)

1. In or about and between January 2020 and August 2020, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants CESAR VALENCIA GARCIA, also known as "Chucho" and "Peludo," DIEGO BELTRAN ALVAREZ, also known as "Chili," OSCAR VALENCIA FLOREZ, also known as "Way," ALEXANDER VALENCIA GARCIA, also known as "Alex," and JHONATAN SAMBONI RUIZ, also known as "Tayson," together with others, did knowingly and intentionally conspire to distribute a controlled substance, intending, knowing and having

reasonable cause to believe that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 959(a) and 960(a)(3). The amount of cocaine involved in the conspiracy attributable to each defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, was five kilograms or more of a substance containing cocaine.

(Title 21, United States Code, Sections 963, 959(d) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 3238 and 3551 et seq.)

COUNT TWO
(International Cocaine Distribution)

2. In or about and between January 2020 and August 2020, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants CESAR VALENCIA GARCIA, also known as “Chucho” and “Peludo,” DIEGO BELTRAN ALVAREZ, also known as “Chili,” OSCAR VALENCIA FLOREZ, also known as “Way,” ALEXANDER VALENCIA GARCIA, also known as “Alex,” and JHONATAN SAMBONI RUIZ, also known as “Tayson,” together with others, did knowingly and intentionally distribute a controlled substance, intending, knowing and having reasonable cause to believe that such substance would be unlawfully imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 959(a), 959(d), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2, 3238 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendants charged in Counts One and Two that, upon their conviction of either of such offenses the government will seek forfeiture in accordance with Title 21, United States Code, Sections 853(a) and 970, which require any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (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 divided

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 defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a), 853(p) and 970)

A TRUE BILL



FOREPERSON



BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2022R00017
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

CESAR VALENCIA GARCIA, also known as "Chucho" and "Peludo," DIEGO BELTRAN ALVAREZ, also known as "Chili," OSCAR VALENCIA FLOREZ, also known as "Way," ALEXANDER VALENCIA GARCIA, also known as "Alex," and JHONATAN SAMBONI RUIZ, also known as "Tayson,"

Defendants.

INDICTMENT

(T. 21, U.S.C., §§ 853(a) and 853(p), 959(a), 959(d), 960(a)(3), 960(b)(1)(B)(ii), 963 and 970; T. 18, U.S.C., §§ 2, 3238 and 3551 et seq.)

A true bill.

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Andrew Wang, Assistant U.S. Attorney (718) 254-6311