

**SEALED**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**Holding a Criminal Term**

**Grand Jury Sworn in on January 8, 2016**

**UNITED STATES OF AMERICA**

v.

**JUAN MANUEL ABOUZOID EL  
BAYEH,**

**also known as  
“El Escorpion,” “El  
Hermano,” “Nene,” and “El  
Arabe,”**

**Defendant.**

Case: 1:17-cr-00094  
Assigned To : Howell, Beryl A.  
Assign. Date : 5/10/2017  
Description: INDICTMENT B  
Case Related to: 14-CR-051 (BAH)

21 U.S.C. §§959(a), 960, and 963  
(Conspiracy to Distribute Five Kilograms or  
More of Cocaine, 500 grams or more of  
methamphetamine, Knowing and Intending  
that it will be Unlawfully Imported into the  
United States.)

18 U.S.C. § 2  
(Aiding and Abetting)

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

**FILED IN OPEN COURT**

**MAY 10 2017**

**CLERK, U.S. DISTRICT COURT  
DISTRICT OF COLUMBIA**

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

From in or around 2012, and continuing to the date of the filing of this Indictment, in the countries of Mexico, the United States and elsewhere, the Defendant, **JUAN MANUEL ABOUZOID EL BAYEH, also known as “El Escorpion,” “El Hermano,” “Nene,” and “El Arabe,”** together with others, both known and unknown to the Grand Jury, did knowingly, intentionally, and willfully conspire to distribute (1) five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; and (2) five hundred (500) grams or more of a mixture and substance containing a detectable amount of

methamphetamine, a Schedule II controlled substance, knowing and intending that such substances would be unlawfully imported into the United States from a place outside thereof, in violation of Title 21, United States Code, Section 959(a); all in violation of Title 21, United States Code, Section 963 and Title 18, United States Code, Section 2.

With respect to the Defendant, the controlled substances involved in the conspiracy attributable to him 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 and substance containing a detectable amount of methamphetamine in violation of Title 21, United States Code, Sections 960(b)(1)(B) and 960(b)(1)(H), respectively.

(Conspiracy to Distribute Five Kilograms or More of Cocaine and 500 Grams or More of Methamphetamine Knowing and Intending that it would be Imported into the United States in violation of Title 21, United States Code, Sections 959(a), 960 and 963, and Title 18, United States Code, Section 2.)

#### **FORFEITURE ALLEGATION**

The United States hereby gives notice to the Defendant that upon conviction of the Title 21 offense 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 a result of the alleged Title 21 violation, and all property used or intended to be used in any manner or part to commit and to facilitate the commission of such offense.

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;

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 said Defendant up to the value of the above forfeitable property.

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

U.S. District and Bankruptcy Courts  
for the District of Columbia  
**A TRUE COPY**  
ANGELA D. CAESAR, Clerk

By: Tiffany Lavigne-Rhodes  
Deputy Clerk  
5/11/17

A TRUE BILL:

Orlando K. Brown  
Foreperson

Arthur G. Wyatt  
ARTHUR G. WYATT  
Chief  
Narcotic and Dangerous Drug Section  
U.S. Department of Justice  
Washington, D.C. 20530

By: Anthony J. Nardozi  
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