

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA) No.
)
)
)
) v.
)
) Violations: Title 21, United States
) Code, Sections 841(a)(1) & 846, and
ANTONIO VALENCIA-PANTOJA, and) Title 18, United States Code,
LUCIO CUEVAS) Section 2.

COUNT ONE

The SPECIAL JANUARY 2012 GRAND JURY charges:

Beginning no later than in or about November 29, 2012 and continuing to in or about November 30, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ANTONIO VALENCIA-PANTOJA, and
LUCIO CUEVAS,

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

COUNT TWO

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about November 30, 2012, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

ANTONIO VALENCIA-PANTOJA, and
LUCIO CUEVAS,

defendants herein, did attempt to knowingly and intentionally distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT THREE

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about November 30, 2012, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

LUCIO CUEVAS,

defendant herein, did knowingly and intentionally possess with intent to distribute a
controlled substance, namely, 500 grams or more of a mixture and substance
containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2012 GRAND JURY further alleges:

1. The allegations of Counts One through Three of this Indictment are incorporated here for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of their violations of Title 21, United States Code, Sections 841(a)(1) and 846, as alleged in Counts One through Three of the foregoing Indictment,

ANTONIO VALENCIA-PANTOJA, and
LUCIO CUEVAS,

defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2): (1) any and all property constituting and derived from, any proceeds they obtained, directly and indirectly, as a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846; and (2) any and all property used, or intended to be used, in any manner or part, to commit and facilitate the commission of the violations of Title 21, United States Code, Sections 841(a)(1) and 846.

3. The interests of the defendants subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853 include, but are not limited to a 2001 green Hyundai Santa Fe, bearing VIN KM8SB82B91U014601.

4. If any of the property described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853(a), 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 to, 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;
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property belonging to defendant under the provisions of Title 21, United States Code, Section 853(p).

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY