

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on November 18, 2022

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	GRAND JURY ORIGINAL
HECTOR DAVID VALDEZ, CRAIG EASTMAN, CHARLES JEFFREY TAYLOR,	:	VIOLATIONS:
Defendants.	:	21 U.S.C. § 846 (Conspiracy to Distribute and Possess With Intent to Distribute Four Hundred Grams or More of a Mixture and Substance Containing a Detectable Amount of Fentanyl)
	:	21 U.S.C. § 841(a)(1) and § 841(b)(1)(C) (Unlawful Possession With Intent to Distribute Fentanyl)
	:	21 U.S.C. § 860(a) (Unlawful Possession With Intent to Distribute Fentanyl Within 1000 Feet of a Protected Location)
	:	FORFEITURE:
	:	21 U.S.C. § 853(p); and 28 U.S.C. § 2461(c)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Case: 1:23-cr-00073
Assigned to: Judge Kollar-Kotelly, Colleen
Assign Date: 3/9/2023
Description: INDICTMENT (B)
Related Case No: 22-cr-00022 (CKK)

From on or about January 2021 to February 24, 2023, within the District of Columbia, the Central District of California, the District of Maryland, and elsewhere, **HECTOR DAVID VALDEZ, CRAIG EASTMAN, and CHARLES JEFFREY TAYLOR**, did knowingly and willfully combine, conspire, confederate and agree together, and with other persons both known and unknown to the Grand Jury, to unlawfully, knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a

ECF DOCUMENT



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United States District and Bankruptcy
Courts for the District of Columbia.

ANGELA D. CAESAR, CLERK

Schedule II narcotic drug controlled substance, and the amount of said mixture and substance, which includes the reasonably foreseeable conduct of all the members of the conspiracy, was four hundred grams or more, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vi).

(Conspiracy to Distribute and Possess With Intent to Distribute 400 Grams or More of a Mixture and Substance Containing a Detectable Amount of Fentanyl, in violation of Title 21, United States Code, Section 846)

COUNT TWO

On or about December 4, 2021, within the District of Columbia, **CRAIG EASTMAN**, did unlawfully, knowingly, and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic drug controlled substance.

(Unlawful Possession With Intent to Distribute Fentanyl, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C))

COUNT THREE

On or about December 4, 2021, within the District of Columbia, **CRAIG EASTMAN**, did unlawfully, knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), within one thousand feet of two protected locations—that is, the real property comprising Rocketship Rise Academy Public School, a public elementary school in the District of Columbia, and within one thousand feet of the real property comprising the Woodland Terrace DC Public Housing Apartments, a housing facility owned by a public housing authority.

(Unlawful Possession With Intent to Distribute Fentanyl Within 1000 Feet of a Protected Location, in violation of Title 21, United States Code, Section 860(a))

COUNT FOUR

On or about January 26, 2022, within the District of Columbia and the District of Maryland, **CRAIG EASTMAN**, did unlawfully, knowingly, and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic drug controlled substance.

(Unlawful Possession With Intent to Distribute Fentanyl, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C))

FORFEITURE ALLEGATION

1. Upon conviction of the offense alleged in Counts One, Two, Three, and Four, and of this Indictment, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853 any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations.

2. If any of the property described above as being subject to forfeiture, 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 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 that cannot be subdivided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to Title 21, United States Code, Section 853(p), as

incorporated by Title 28, United States Code, Section 2461(c).

(**Criminal Forfeiture**, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c))

A TRUE BILL:

FOREPERSON.

Matthew N. Graves /DTW

Attorney of the United States in
and for the District of Columbia.