

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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FILED
U.S. DISTRICT COURT
FOR THE DISTRICT OF DELAWARE
2020 NOV 12 PM 12:33

UNITED STATES OF AMERICA,

v.

LUIS RAÚL CASTRO
VALENZUELA, a/k/a CHACHO,

Defendant.

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Criminal Action No. 20-75-UNA

SEALED

INDICTMENT

The Grand Jury for the District of Delaware charges that:

~~REDACTED~~

UNSEALED
3/26/21
KJK

COUNT ONE

Conspiracy to Distribute Controlled Substances (21 U.S.C. § 846)

1. Beginning in or around March 2017, and continuing to on or about November 11, 2020, in the District of Delaware, and elsewhere, defendant Luis Raúl Castro Valenzuela, a/k/a "Chacho" ("CASTRO VALENZUELA"), knowingly and intentionally combined, conspired, confederated, and agreed with Jamar Jackson ("JACKSON") and with other persons known and unknown to the Grand Jury, to distribute one kilogram or more of a mixture and substance containing a detectible amount of heroin, a Schedule I controlled substance, and 400 grams or more of a mixture and substance containing a detectible amount of fentanyl, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

All in violation of 21 U.S.C. § 846.

COUNT TWO

Hostage Taking (18 U.S.C. § 1203)

2. From on or about January 14, 2020, until on or about November 11, 2020, CASTRO VALENZUELA did intentionally conspire to and did intentionally seize and detain, and threaten to kill, injure, and continue to detain, N.D., a national of the United States, in order to compel JACKSON to pay a sum of money as a condition for the release of N.D. by selling

controlled substances provided by CASTRO VALENZUELA throughout the District of Delaware and elsewhere, all in violation of 18 U.S.C. § 1203(a)(1) and (b)(1)(A).

COUNT THREE
Kidnapping (18 U.S.C. § 1201)

3. On or about January 14, 2020, and continuing through November 11, 2020, in the District of Delaware and elsewhere, the defendant, CASTRO VALENUZELA, did unlawfully and willfully seize, confine, inveigle, decoy, kidnap, abduct, carry away and hold for ransom N.D. without her consent, and, in committing the offense and in furtherance of the commission of the offense, used WhatsApp, a means, facility, and instrumentality of interstate or foreign commerce, all in violation of 18 U.S.C. § 1201(a)(1) and (b).

NOTICE OF FORFEITURE REGARDING COUNTS ONE, TWO, AND THREE

Pursuant to 21 U.S.C. § 853(a), 18 U.S.C. § 982(b)(1), and 28 U.S.C. § 2461, upon conviction of the offense(s) alleged in Counts One, Two, and Three of this Indictment, the defendant shall forfeit to the United States of America any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of the said violation, and all property, real or personal, that was used to facilitate, or was intended to be used to facilitate the commission of said violation. If any of the property described above, as a result of any act or omission of the defendant:

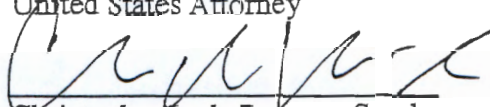
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).

Grand Jury Foreperson

DAVID C. WEISS
United States Attorney

BY:



Christopher L. de Barrera-Sarobe
Whitney C. Cloud
Assistant United States Attorneys

DATED: November 12, 2020

DEFENDANT INFORMATION SHEET

FILE COPY

CR20-75-24

TO: Clerk, U.S. District Court Felony Class A Misdemeanor

DEFENDANT: LUIS RAÚL CASTRO VALENZUELA Indictment Information

DOB (Year Only) 1986 COUNTY OF OFFENSE: New Castle

REDACTED

OFFENSE(S) & CITATION(S): **SEALED** MAXIMUM PENALTIES:

Conspiracy to distribute controlled substances, over one kilogram of heroin and 400 grams of fentanyl, in violation of 21 U.S.C. § 846	Life in prison (minimum of 10 years); lifetime of supervised release (minimum of 5 years); \$10,000,000 Fine; and \$100 Special Assessment
Hostage taking, in violation of 18 U.S.C. § 1203	Life imprisonment; \$250,000 fine; 5 years' supervised release; and \$100 Special Assessment
Kidnapping, in violation of 18 U.S.C. § 1201(a)(1)	Life imprisonment; \$250,000 fine; 5 years' supervised release; and \$100 Special Assessment

INSTRUCTIONS

Order to Produce for Arraignment on: _____ at 1:00 p.m.

Issue Arrest Warrant upon signing of Order _____

Issue Summons for Initial Appearance on: _____ at _____

Interpreter Needed _____ Language _____

DEFENDANT INFORMATION

Defendant's Address: _____

City: _____ County: _____ State: _____ Zip: _____

Date of Arrest: _____ Date of 1st Appearance in this District _____

Bail Set: _____ Date Made: _____ Remains in Federal Custody

/s Christopher L. de Barrera-Sarobe
Assistant United States Attorney

FILED

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