SEAL

PILED N.S. DISTRICT COURT EASTERN DISTRICT OF LA

2019 MAY 16 P 1:56

WILLIAM W. BLEVINS

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

FELONY

INDICTMENT FOR VIOLATIONS OF THE THE FEDERAL CONTROLLED SUBSTANCES ACT

UNITED STATES OF AMERICA

CRIMINAL NO. 19-00092

SECTION:

SECT. | MAG. 5

Doc. No.

DANIEL CABRERA-VERGARA, JR.

a/k/a "Junior" a/k/a "Jr."

v.

VIOLATIONS: 21 U.S.C. § 846 21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)

21 U.S.C. § 843(b)

LARANZA THOMAS a/k/a "Dude"

The Grand Jury charges that:

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams or More of a Mixture or Substance Containing Methamphetamine)

Beginning on a date unknown, but not later than October 30, 2018, and continuing until on or about November 6, 2018, in the Eastern District of Louisiana, and elsewhere, the defendants,

DANIEL CABRERA-VERGARA, JR., a/k/a "Junior," a/k/a "Jr.," and LARANZA

THOMAS, a/k/a "Dude," did knowingly and intentionally combine, conspire, confederate and process of the control of the cont

to possess with the intent to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

COUNT 2

(Use of a Communication Facility in Causing or Facilitating a Drug Trafficking Felony)

On or about November 2, 2018, in the Eastern District of Louisiana, the defendant, **DANIEL CABRERA-VERGARA**, **JR.**, **a/k/a "Junior," a/k/a "Jr.,"** did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of any act or acts constituting a felony under Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and to possess with the intent to distribute methamphetamine, a Schedule II drug controlled substance, as charged in Count 1 of this Indictment; all in violation of Title 21, United States Code, Section 843(b).

COUNT 3

(Use of a Communication Facility in Causing or Facilitating a Drug Trafficking Felony)

On or about November 5, 2018, in the Eastern District of Louisiana, the defendant, LARANZA THOMAS, a/k/a "Dude," did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of any act or acts constituting a felony under Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and to possess with the intent to distribute methamphetamine, a Schedule II drug controlled substance, as charged in Count 1 of this Indictment; all in violation of Title 21, United States Code, Section 843(b).

NOTICE OF DRUG FORFEITURE

- 1. The allegations of Counts One through Three of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.
- 2. As a result of the offenses charged in Counts One through Three, the defendants, DANIEL CABRERA-VERGARA, JR., a/k/a "Junior," a/k/a "Jr.," and LARANZA THOMAS, a/k/a "Dude," shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One through Three of this Indictment.
- 3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, 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 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 said defendant up to the value of the above forfeitable property. All in violation of Title 21, United States Code, Sections 853, 841(a)(1), 841(b)(1)(A), and 846.

PETER G. STRASSER UNITED STATES ATTORNEY

K. PAIGE O'HALE
Assistant United States Attorney

New Orleans, Louisiana May 16, 2019