

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
	)	Criminal No. 15-CR-300___-MGM
v.	)	
	)	21 U.S.C. § 841 (Distribution and Possession
JUAN VELAZQUEZ,	)	with Intent to Distribute Heroin)
a/k/a Big Head Tito,	)	(Counts One and Two)
	)	
Defendant.	)	18 U.S.C. § 2 (Aiding and Abetting)
	)	(Count One)
	)	
	)	21 U.S.C. § 853
	)	(Forfeiture Allegation)
	)	

INDICTMENT

The Grand Jury charges that:

COUNT ONE: Title 21, United States Code, Section 841: Distribution and Possession with Intent to Distribute Heroin; Title 18, United States Code, Section 2: Aiding and Abetting

1. On or about June 9, 2015, in Hampden County, in the District of Massachusetts,

JUAN VELAZQUEZ,  
a/k/a Big Head Tito,

the defendant herein, did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT TWO: Title 21, United States Code, Section 841: Distribution and Possession with Intent to Distribute Heroin

1. On or about June 23, 2015, in Hampden County, in the District of Massachusetts,

JUAN VELAZQUEZ,  
a/k/a Big Head Tito,

the defendant herein, did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

FORFEITURE ALLEGATION  
(Title 21, United States Code, Section 853)

The Grand Jury further charges that:

1. Upon conviction of either or both of the offenses alleged in Counts One and Two of this Indictment,

JUAN VELAZQUEZ,  
a/k/a Big Head Tito,

defendant herein, shall forfeit to the United States, any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

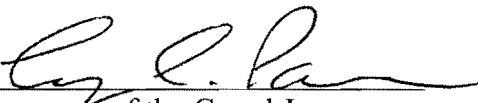
2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendant,

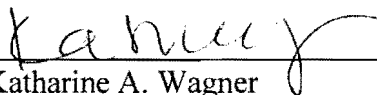
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot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

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1 above.

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

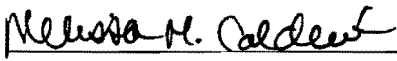
A TRUE BILL

  
Foreperson of the Grand Jury

  
Katharine A. Wagner  
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS:

Returned into the District Court by the Grand Jurors and filed on  
October 22, 2015.

  
Deputy Clerk of Court