

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA  
PENSACOLA DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**Case Number 3:18cr91/RV**

**DANIEL J. GOULD**  
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**FACTUAL BASIS FOR GUILTY PLEA**

The defendant admits that if this case were to proceed to trial, the government could prove the following facts.

On or about August 13, 2018, the Drug Enforcement Administration (“DEA”) in Pensacola received information that Master Sergeant Daniel Gould (“defendant”) of the United States Army attempted to import 40 kilograms of cocaine onto a United States military transport flight out of the country of Colombia with a final destination of the Northern District of Florida. DEA Bogota seized the 40 kilograms at the United States Embassy in Colombia. The defendant had already returned to the Northern District of Florida prior to this attempted import and was awaiting its arrival. The seizure was made after suspicion was aroused at the United States Embassy when packages the cocaine was secreted in were x-rayed. The x-rays revealed 40 kilograms of cocaine within gutted out punching bags. When confronted with the evidence by military personnel, the defendant admitted his illicit

acts. The defendant now admits he was involved in an international conspiracy with co-defendants Henry Royer and Gustavo Pareja. The conspiracy to import and distribute cocaine within the Northern District of Florida progressed as follows:

The defendant and co-defendant Royer discussed a plan to smuggle kilograms of cocaine from Colombia into the United States in early 2018. Around that time, co-defendant Royer traveled to Cali, Colombia, with \$9800 in United States currency to use as payment for 10 kilograms of cocaine. Co-defendant Royer stayed at the defendant's apartment in Cali during this time. In May/June, the defendant made contact with co-defendant Pareja (a Colombian national), and the defendant made inquiries about the potential of procuring cocaine for distribution. Co-defendant Pareja confirmed he could acquire cocaine for the defendant for \$1800-\$1900 per kilogram. The defendant contacted co-defendant Royer to get more funds to add to the original \$9800 to cover the expense. The defendant subsequently acquired the 10 kilograms of cocaine from co-defendant Pareja, and he placed them in a gutted punching bag and asked a driver to take the package to Bogota to be put on a United States military aircraft.

A few days later, the cocaine filled punching bag was placed on a military flight and eventually made its way to Duke Field in the Northern District of Florida. From there, after shopping around ideas regarding distribution, the defendant and co-defendant Royer met with a black male in Crestview, Florida, who, via multiple

transactions, purchased almost all of the 10 kilograms of cocaine from the defendant and co-defendant Royer for distribution onto the streets of Northwest Florida.

The defendant and co-defendant Royer then decided to reinvest the money from the first load of cocaine into a second load – of greater quantity. They decided to procure 40 kilograms of cocaine with their money while the defendant was soon to be back in Colombia. The defendant placed approximately \$65,000 in a box for transport on a United States military cargo aircraft back down to Colombia as funds for the next purchase. This money was retrieved by the same driver who initially dropped off the aforementioned punching bag. In early August, the defendant and co-defendant Royer were both back in Cali, Colombia. They provided co-defendant Pareja the money (approximately \$5,000 more in currency was needed, which they obtained) for the 40 kilograms. While co-defendant Pareja was obtaining the cocaine, the defendant obtained more punching bags for the transport.

The defendant and co-defendant Royer received the cocaine at the defendant's apartment complex in Colombia. Then the defendant and co-defendant Royer loaded the 40 kilograms into the two gutted punching bags. Co-defendant Royer flew back to the United States as did the defendant. The defendant coordinated for the punching bags to be driven to the United States Embassy in Colombia and put onto a military aircraft. There was an initial scare for the defendant about his driver and vehicle being searched as the 40 kilograms were making their way to the aircraft

and the drop off was initially aborted, but only for about 24 hours. The defendant and co-defendant Royer had the driver try a second time, and that is when the conspiracy was discovered on or about August 13, 2018.

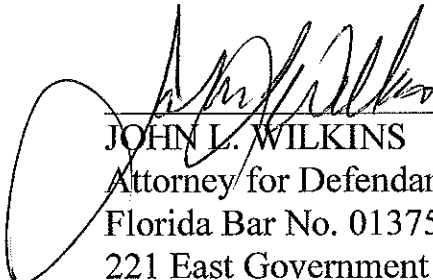
Military security officers contacted the defendant, and he confessed. The defendant's admissions were corroborated by flight records, financial records, video surveillance, forensic evidence, and seized items, amongst other things. In total, the conspiracy imported (or attempted to import) 50 kilograms of cocaine for distribution in the United States. Law enforcement has 40 kilograms in custody directly tied to the conspiracy. The estimated value of 40 kilograms of cocaine in the Northern District of Florida would be in excess of \$1 million.

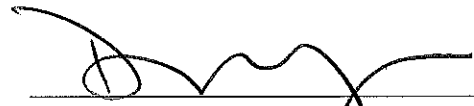
**ELEMENTS OF THE OFFENSES**

Count One: First, two or more people in some way agreed to try to accomplish a shared and unlawful plan to distribute cocaine for unlawful importation. Second, the defendant knew (or had reasonable cause to believe) the unlawful purpose of the plan and willfully joined in it. Third, the object of the unlawful plan was to distribute more than five kilograms of cocaine for importation into the United States from Colombia.

Count Two: First, two or more people in some way agreed to try to accomplish a shared and unlawful plan to distribute cocaine. Second, the defendant knew the unlawful purpose of the plan and willfully joined in it. Third, the object of the unlawful plan was to distribute more than five kilograms of cocaine.

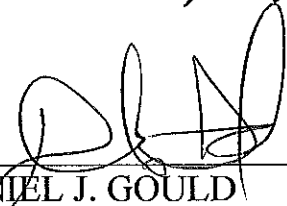
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December 20, 2018  
Date

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DANIEL J. GOULD  
Defendant

December 20, 2018  
Date