

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

UNITED STATES OF AMERICA

v.

**DANIEL J. GOULD
GUSTAVO A. PAREJA
and
HENRY W. ROYER**

**SUPERSEDING
INDICTMENT
3:18cr91/RV**


THE GRAND JURY CHARGES:

COUNT ONE

Between on or about January 1, 2018, and on or about August 13, 2018, in the Northern District of Florida, in the country of Colombia, and elsewhere, the defendants,

**DANIEL J. GOULD,
GUSTAVO A. PAREJA,
and
HENRY W. ROYER,**

did knowingly and willfully combine, conspire, confederate, and agree together and with other persons to distribute a controlled substance, and this offense involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, intending, knowing, and having reasonable cause to believe

Returned in open court pursuant to Rule 6(f)
11-27-18
Date

United States Magistrate Judge

that such a substance would be unlawfully imported into the United States from a place outside thereof, in violation of Title 21, United States Code, Section 959.

All in violation of Title 21, United States Code, Section 963.

COUNT TWO

Between on or about January 1, 2018, and on or about August 13, 2018, in the Northern District of Florida, in the country of Colombia, and elsewhere, the defendants,

**DANIEL J. GOULD,
GUSTAVO A. PAREJA,
and
HENRY W. ROYER,**

did knowingly and willfully combine, conspire, confederate, and agree together and with other persons to distribute and possess with intent to distribute a controlled substance, and this offense involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii).

All in violation of Title 21, United States Code, Section 846.

CRIMINAL FORFEITURE

The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging

v. has been commingled with other property that cannot be subdivided without difficulty,

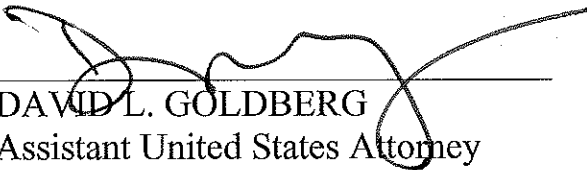
it is the intent of the United States, pursuant to Title 21, United States Code, Sections 853(p) and 970, to seek forfeiture of any other property of the defendants, up to the value of the above forfeitable property.

A TRUE BILL:


FOREPERSON

11-27-18
DATE


CHRISTOPHER P. CANOVA
United States Attorney


DAVID L. GOLDBERG
Assistant United States Attorney