

**FILED**  
5/28/2024

**KSR**

Case 1:16-cr-00561  
Judge Sara L. Ellis  
Magistrate Judge Keri L. Holleb Hotaling  
CAT. 4

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
	)	
v.	)	No. 16 CR 561
	)	
	)	Violations: Title 21, United States
DANIEL GONZALEZ-MUNGUIA,	)	Code, Sections 841(a)(1), 952(a) and
aka "Alejandro Vasquez"	)	960(a)(1)

**COUNT ONE**

THE SPECIAL MAY 2024 GRAND JURY charges:

1. At times material to this Indictment:

a. Pentobarbital, also known as Nembutal, was a drug sold in Mexico in commercially-available bottles for the purpose of euthanizing animals. Pentobarbital is a controlled substance in the United States and has been used in state-sponsored executions.

b. DANIEL GONZALEZ-MUNGUIA was a resident of Puebla, Mexico and the user of e-mail accounts registered in the alias name of "Alejandro Vasquez," who operated an online drug business that sold pentobarbital for use in committing suicide.

c. Western Union, MoneyGram, PayPal, and Bitcoin were methods of payment, among others, that defendant GONZALEZ-MUNGUIA accepted in exchange for shipping pentobarbital.

d. The United States Postal Service, DHL, Fed Ex, United Parcel Service, and Mexico Post were methods of shipment used by defendant GONZALEZ-MUNGUIA in his online drug business.

e. Individual A was a resident of Puebla, Mexico, who assisted defendant GONZALES-MUNGUIA in his online drug business by transporting pentobarbital from Mexico into the United States.

f. Individual B was a resident of Los Angeles, California, who assisted defendant GONZALES-MUNGUIA by packaging and shipping pentobarbital that defendant caused to be brought into the United States.

2. On or about June 17, 2019, at Naperville, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL GONZALEZ-MUNGUIA,  
aka "Alejandro Vasquez,"

defendant herein, did knowingly and intentionally import into the United States from a place outside the United States, namely, Mexico, a controlled substance, namely, a quantity of pentobarbital, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

COUNT TWO

THE SPECIAL MAY 2024 GRAND JURY further charges:

1. The allegations in Paragraph 1 of Count One are incorporated here.
2. On or about June 17, 2019, at Naperville, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL GONZALEZ-MUNGUIA,  
aka “Alejandro Vasquez,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of pentobarbital, a Schedule II Controlled Substance;

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

COUNT THREE

THE SPECIAL MAY 2024 GRAND JURY further charges:

1. The allegations in Paragraph 1(a) through 1(d) of Count One are incorporated here.

2. On or about May 23, 2016, at Batavia, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL GONZALEZ-MUNGUIA,  
aka “Alejandro Vasquez,”

defendant herein, did knowingly and intentionally import into the United States from a place outside the United States, namely, Mexico, a controlled substance, namely, a quantity of pentobarbital, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
Erika L. Csicsila on behalf of the  
ACTING UNITED STATES ATTORNEY