IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

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| UNITED STATES OF AMERICA | NO. 3:24-CR-343-E |
| v. | |
| JUAN CARLOS GARCIA VARGAS | |

# FACTUAL RESUME

In support of Juan Carlos Garcia Vargas's plea of guilty to the offense in Count One of the indictment, Juan Carlos Garcia Vargas, the defendant; Michael Hawk, the defendant's attorney; and the United States of America (the government) stipulate and agree to the following:

## Elements of the Offense

To prove the offense alleged in Count One of the indictment, charging a violation of 21 U.S.C. §§ 841(a)(1), and 841(b)(1)(C), that is, possession with intent to distribute a controlled substance, said substance being a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, the government must prove each of the following elements beyond a reasonable doubt: [1]

First: That the defendant knowingly possessed a controlled substance;

Second: That the substance was in fact cocaine;

Third: That the defendant possessed the substance with the intent to distribute it; and

Fourth: That the substance was a quantity of a mixture or substance that

[1] Fifth Circuit Pattern Jury Instruction 2.95A and 2.04 (5th Cir. 2019)

contained a detectable amount of cocaine

## Stipulated Facts

1. In reference to Count One of the Indictment, Juan Carlos Garcia Vargas, admits and agrees that on or about June 4, 2024, in the Dallas Division of the Northern District of Texas, he did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C).

2. Garcia Vargas admits that on or about June 4, 2024, he was driving westbound in the 1400 block of East Belt Line Road, Carrollton, Dallas County, Texas, which is located in the Dallas Division of the Northern District of Texas. Garcia Vargas admits that he committed a traffic violation and an officer attempted to pull him over. Garcia Vargas admits that he did not pull over and that a chase ensued. Garcia Vargas admits that during the chase he threw out a black bag from his driver's side window. Garcia Vargas admits that he was eventually apprehended by officers who searched his vehicle where they located approximately .53 grams of cocaine. Garcia Vargas admits officers located the bag he had thrown out of the window and they found a black 40 caliber Glock 23 handgun (SIN #BCDV594) and approximately $1000 in United States currency.

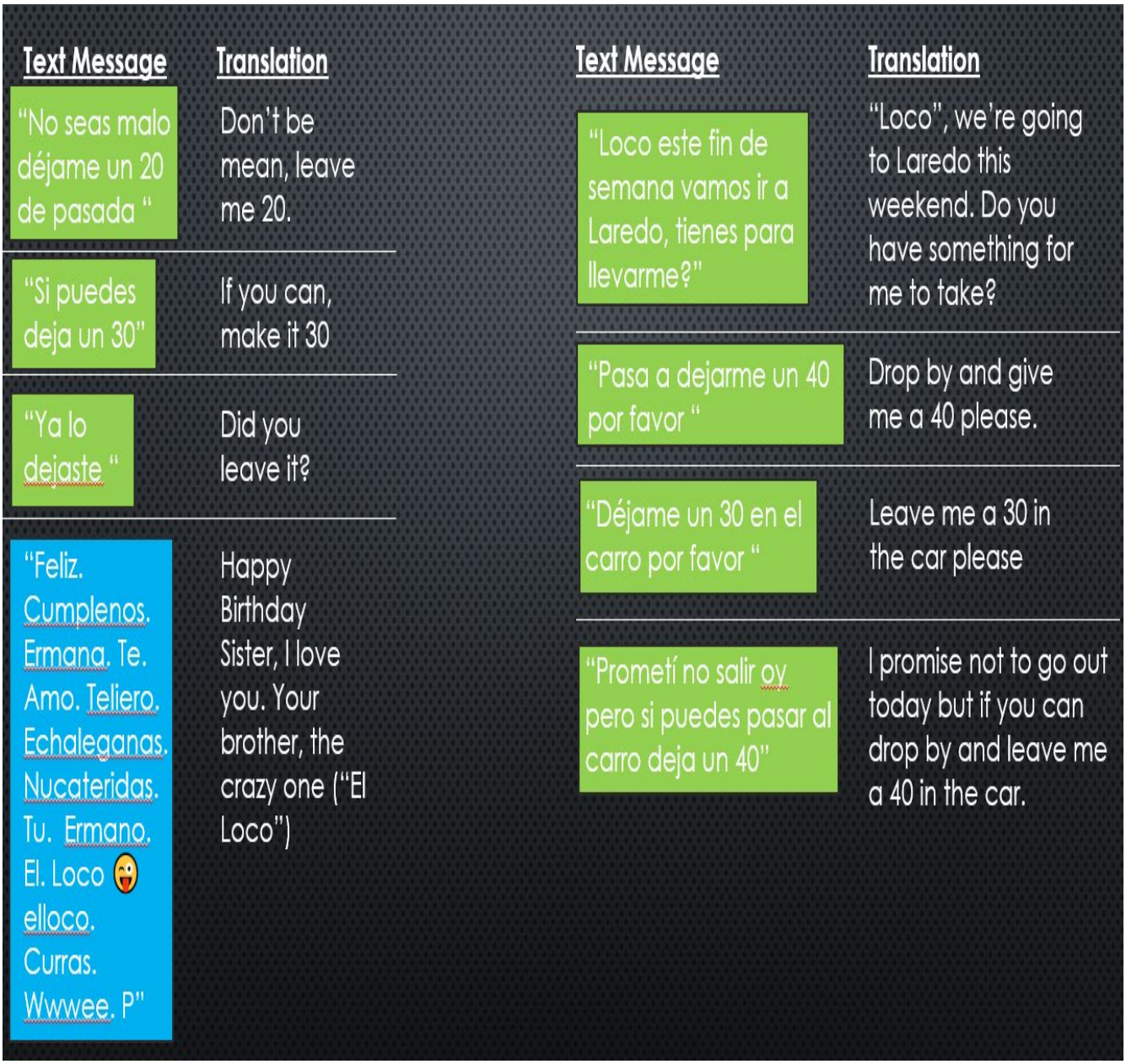


3. A subsequent search of the vehicle Garcia Vargas was in revealed an additional amount of cocaine and a black IPhone with a gray black case. Garcia Vargas admits that a search warrant was obtained for the IPhone. A photograph from May 21, 2024 was located on the Iphone. The photo revealed a white substance that was placed on a scale.



Garcia Vargas admits this substance was cocaine and that it was an amount consistent with distribution.

4. Garcia Vargas also admits that the search of the phone revealed multiple text conversations from people utilizing coded language asking the defendant to deliver cocaine to them in amounts of 20, 30 and 40 grams:



5. Garcia Vargas admits he made money from the distribution of cocaine and that he deposited the drug proceeds in various safety boxes that were searched by officers.








6.

7. Garcia Vargas also admits he used the profits from the cocaine he sold to purchase real property located at 1722 Kirby Road in Carrollton, Texas and 13906 Sundown Trl, in Farmers Branch, Texas.

8. Garcia Vargas admits the following items were earned from, or were used or intended to be used in some manner or part to commit or facilitate the commission of the offense described in this factual resume and alleged in Count One of the indictment and that they were involved in or are traceable property involved in the offense alleged in Count One of the indictment:

a. $1,117,959.11 in United States Currency;

b. 2016 Honda Accord, VIN #1HGCR2F32GA125894;

c. 40 caliber Glock 23 handgun (S/N #BCDV594);

d. Real property located at 13906 Sundown Trail, Farmers Branch, Texas, 75234;

e. Real property located at 1722 Kirby Road, Carrollton, Texas, 75006.

Garcia Vargas consents to the forfeiture administrative or judicial of all of these items.

9. The defendant agrees that the defendant committed all the essential elements of the offense in Count One of the indictment and he admits that the offense(s) described occurred in the Northern District of Texas, and elsewhere. The defendant further admits he understands this factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count One of the indictment.

AGREED TO AND STIPULATED on this ___ day of _____,

202_____.

CHAD E. MEACHAM
ACTING UNITED STATES ATTORNEY

_____
Juan Carlos Garcia Vargas
Defendant

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