UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

# JUDGE KAPLAN

UNITED STATES OF AMERICA

- v. -

Defendants.

INDICTMENT

17 CR

17 CRIM 319

#### COUNT ONE

(Kidnapping Conspiracy)

The Grand Jury charges:

- 1. In or about December 2016, in the Southern District of New York and elsewhere, ISMAEL CASTREJON-GUIZAR, a/k/a "Guero," EDGARDO NAVAREZ, a/k/a "Edgar," DULCE SANTOS-VALENZUELA, and RICARDO OCASIO-REYES, a/k/a "Ricky," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1201.
- 2. It was a part and an object of the conspiracy that ISMAEL CASTREJON-GUIZAR, a/k/a "Guero," EDGARDO NAVAREZ, a/k/a "Edgar," DULCE SANTOS-VALENZUELA, and RICARDO OCASIO-REYES, a/k/a "Ricky," the defendants, and others known and unknown, would and

did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise, a person (the "Victim"), and did travel in interstate commerce, in violation of Title 18, United States Code, Section 1201(a)(1).

### Overt Acts

- 3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed by ISMAEL CASTREJON-GUIZAR, a/k/a "Guero," EDGARDO NAVAREZ, a/k/a "Edgar," DULCE SANTOS-VALENZUELA, and RICARDO OCASIO-REYES, a/k/a "Ricky," the defendants, in the Southern District of New York and elsewhere:
- a. On or about December 6, 2016, CASTREJON-GUIZAR, NAVAREZ, and SANTOS-VALENZUELA, the defendants, forcibly abducted the Victim in a parking lot in Chamblee, Georgia, during which time a firearm was placed against the Victim's head and the Victim was stabbed with a knife in the leg.
- b. On or about December 6 and December 7, 2016, CASTREJON-GUIZAR, NAVAREZ, SANTOS-VALENZUELA, and OCASIO-REYES, the defendants, held the Victim hostage at a residence in Atlanta, Georgia, during which time a gun was fired in the presence of the Victim.
- c. On or about December 7 and December 8, 2016, CASTREJON-GUIZAR, NAVAREZ, SANTOS-VALENZUELA, and OCASIO-REYES,

the defendants, drove two vehicles, one containing the Victim, northward, en route to the Bronx, New York.

d. On or about December 8, 2016, the vehicle containing NAVAREZ and SANTOS-VALENZUELA, the defendants, drove over the George Washington Bridge, into the Bronx, New York, where NAVAREZ and SANTOS-VALENZUELA used the Victim's debit card to make purchases of items at a bodega.

(Title 18, United States Code, Section 1201(c).)

#### COUNT TWO

(Use/Possession/Discharge of Firearms)

The Grand Jury further charges:

4. In or about December 2016, in the Southern District of New York and elsewhere, ISMAEL CASTREJON-GUIZAR, a/k/a "Guero," EDGARDO NAVAREZ, a/k/a "Edgar," DULCE SANTOS-VALENZUELA, and RICARDO OCASIO-REYES, a/k/a "Ricky," the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the kidnapping conspiracy charged in Count One of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crimes, did possess

firearms, and did aid and abet the use, carrying, and possession of firearms, which were brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), (iii), and 2.)

FOREPERSON

JOON H. KIM MS

Acting United States Attorney

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

#### UNITED STATES OF AMERICA

- v. -

ISMAEL CASTREJON-GUIZAR, a/k/a "Guero,"
EDGARDO NAVAREZ, a/k/a "Edgar,"
DULCE SANTOS-VALENZUELA, and
RICARDO OCASIO-REYES, a/k/a "Ricky,"

Defendants.

## INDICTMENT

1.7 CR

(18 U.S.C. §§ 924(c), 1201(c), and 2.)

JOON H. KIM
Acting United States Attorney.

A TRITE BILL

Foreperson.