

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence  
of the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington

June 8, 2022

RAVI SUBRAMANIAN, Clerk

By Deputy

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CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA  
BY DEPUTY

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESUS VENEGAS-GATICA,  
JOSE VENEGAS-GATICA,  
JUAN TOLENTINO-CHINO,  
CRISTOBAL VENEGAS-DIAZ, and  
ESTEBAN MARTINEZ-ORTIZ

Defendants.

CASE NO. CR22-5142DGE

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**  
**(Distribution of a Controlled Substance)**  
**(Rochester Parking Lot)**

On or about March 3, 2022, in Thurston County, within the Western District of Washington, and elsewhere, JUAN TOLENTINO-CHINO and JOSE VENEGAS-GATICA, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including: methamphetamine, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

Indictment - 1

United States v. Venegas-Gatica et al  
USAO No. 2022R00583

UNITED STATES ATTORNEY  
1201 PACIFIC AVE., SUITE 700  
TACOMA, WASHINGTON 98402  
(253) 428-3800

**COUNT 2**  
**(Distribution of a Controlled Substance)**  
***(Hoquiam Parking Lot)***

On or about March 9, 2022, in Grays Harbor County, within the Western District of Washington, and elsewhere, JUAN TOLENTINO-CHINO and JOSE VENEGAS-GATICA, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including: methamphetamine, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT 3**  
**(Possession of a Controlled Substance with Intent to Distribute)**  
***(Kelso Train Station)***

On or about March 31, 2022, in Cowlitz County, within the Western District of Washington, and elsewhere, ESTEBAN MARTINEZ-ORTIZ and JESUS VENEGAS-GATICA, and others known and unknown, did knowingly and intentionally possess, with the intent to distribute, and aid and abet the possession of, with the intent to distribute, a controlled substance, including: methamphetamine, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

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**COUNT 4**  
**(Distribution of a Controlled Substance)**  
***(Centralia Parking Lot)***

On or about April 7, 2022, in Lewis County, within the Western District of Washington, and elsewhere, CRISTOBAL VENEGAS-DIAZ and JOSE VENEGAS-GATICA, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including: methamphetamine, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT 5**  
**(Distribution of a Controlled Substance)**  
***(Centralia Parking Lot)***

On or about April 21, 2022, in Lewis County, within the Western District of Washington, and elsewhere, CRISTOBAL VENEGAS-DIAZ, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including: methamphetamine, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

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**COUNT 6****(Possession of a Controlled Substance with Intent to Distribute)  
(Lakewood Residence)**

On or about May 11, 2021, in Pierce County, within the Western District of Washington, and elsewhere, JESUS VENEGAS-GATICA and others known and unknown, did knowingly and intentionally possess, with the intent to distribute, and aid and abet the possession of, with the intent to distribute, a controlled substance, including: methamphetamine, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT 7****(Possession of a Controlled Substance with Intent to Distribute)  
(Vehicle)**

On or about May 11, 2021, in Lewis County, within the Western District of Washington, and elsewhere, CRISTOBAL VENEGAS-DIAZ and others known and unknown, did knowingly and intentionally possess, with the intent to distribute, and aid and abet the possession of, with the intent to distribute, a controlled substance, including: methamphetamine, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

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**FORFEITURE ALLEGATION**

The allegations contained in Counts 1-7 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

**COUNTS 1 and 2**  
**(Distribution of Controlled Substances)**

Upon conviction of either of the offenses alleged in Counts 1 and 2, JUAN TOLENTINO-CHINO and JOSE VENEGAS-GATICA shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense. This property includes, but is not limited to a sum of money reflecting the proceeds the relevant defendant obtained from the offense.

**COUNT 3**  
**(Possession with Intent to Distribute Methamphetamine)**

Upon conviction of the offense alleged in Count 3, ESTEBAN MARTINEZ-ORTIZ and JESUS VENEGAS-GATICA shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense.

**COUNT 4**  
**(Distribution of Controlled Substances)**

Upon conviction of the offense alleged in Count 4, CRISTOBAL VENEGAS-DIAZ and JOSE VENEGAS-GATICA shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense. This property includes, but is not limited to a sum of money reflecting the proceeds the relevant defendant obtained from the offense.

**COUNT 5**

**(Distribution of Controlled Substances)**

Upon conviction of the offense alleged in Count 5, CRISTOBAL VENEGAS-DIAZ shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense. This property includes, but is not limited to a sum of money reflecting the proceeds CRISTOBAL VENEGAS-DIAZ obtained from the offense.

**COUNT 6**

**(Possession with Intent to Distribute Methamphetamine)**

Upon conviction of the offense alleged in Count 6, JESUS VENEGAS-GATICA shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense.

**COUNT 7**

**(Possession with Intent to Distribute Methamphetamine)**

Upon conviction of the offense alleged in Count 7, CRISTOBAL VENEGAS-DIAZ shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense.

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1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of any  
2 act or omission of the defendant,

- 3 a. cannot be located upon the exercise of due diligence;  
4 b. has been transferred or sold to, or deposited with, a third party;  
5 c. has been placed beyond the jurisdiction of the Court;  
6 d. has been substantially diminished in value; or,  
7 e. has been commingled with other property which cannot be divided  
8 without difficulty,


9 it is the intent of the United States to seek the forfeiture of any other property of the  
10 defendant, up to the value of the above-described forfeitable property, pursuant to  
11 Title 21, United States Code, Section 853(p).

14 A TRUE BILL:

15 DATED: 6/8/2022

17 *Signature of Foreperson redacted pursuant*  
18 *to the policy of the Judicial Conference of*  
19 *the United States.*

20 FOREPERSON

21   
22 NICHOLAS W. BROWN  
United States Attorney

23   
24 GRADY J. LEUPOLD  
25 Assistant United States Attorney

26   
27 ZACHARY W. DILLON  
28 Assistant United States Attorney