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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2021 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN ABEL BACA,

Defendant.

SA CR 8:21-cr-00187-JVS

I N D I C T M E N T

[21 U.S.C. §§ 841(a)(1),
(b)(1)(B)(ii), (b)(1)(C):
Distribution of Cocaine; 21 U.S.C.
§ 853: Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about April 29, 2021, in Orange County, within the Central District of California, defendant JOHN ABEL BACA knowingly and intentionally distributed cocaine, a Schedule II narcotic drug controlled substance.

COUNT TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(ii)]

On or about May 4, 2021, in Orange County, within the Central District of California, defendant JOHN ABEL BACA knowingly and intentionally distributed at least 500 grams, that is, approximately 1,006 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

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1 FORFEITURE ALLEGATION

2 [21 U.S.C. § 853]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 21,
6 United States Code, Section 853, in the event of the defendant's
7 conviction of the offenses set forth in Counts One and Two of this
8 Indictment. The defendant, if so convicted, shall forfeit to the
9 United States of America the following:

10 (a) All right, title and interest in any and all property,
11 real or personal, constituting or derived from, any proceeds which
12 the defendant obtained, directly or indirectly, from such offense;

13 (b) All right, title and interest in any and all property,
14 real or personal, used, or intended to be used, in any manner or
15 part, to commit, or to facilitate the commission of such offense;

16 (c) To the extent such property is not available for
17 forfeiture, a sum of money equal to the total value of the property
18 described in subparagraphs (a) and (b).

19 2. Pursuant to Title 21, United States Code, Section 853(p),
20 and as incorporated by Title 28, United States Code, Section 2461(c),
21 the defendant, if so convicted of any of Counts One and Two of this
22 Indictment, shall forfeit substitute property, up to the value of the
23 total amount described in paragraph 1, if, as the result of any act
24 or omission of the defendant, the property described in paragraph 1,
25 or any portion thereof: (a) cannot be located upon the exercise of
26 due diligence; (b) has been transferred, sold to, or deposited with a
27 third party; (c) has been placed beyond the jurisdiction of the
28 court; (d) has been substantially diminished in value; or (e) has

