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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY [Signature]  
DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN MANUEL MUNOZ-LUEVANO aka "EL  
INGENIERO" aka "EL INGE" aka "MONO" aka  
"THE ENGINEER" aka "MANUELITO"

Defendant.

SA 15 CR 0024 DAE  
CRIM. NO.  
INDICTMENT

- CT 1: 21:846 & 841(a)(1)-  
Conspiracy to Possess a Controlled  
Substance with Intent to Distribute  
(Cocaine);
- CT 2: 21:952 & 960(a)(1)-  
Conspiracy to Import with Intent to  
Distribute a Controlled Substance  
(Cocaine);
- CT 3: 21: 959(a)- Unlawful  
Distribution of a Controlled  
Substance Extra-territorial;
- CT 4: 21:841(a)(1) and 18:2-  
Possession with Intent to Distribute  
(Cocaine); Aiding & Abetting
- CT 5: 18:924(c)(1) & (o)-  
Conspiracy to Possess Firearms in  
Furtherance of Drug Trafficking;
- CT:6 18:1956- Laundering of  
Monetary Instruments

**THE GRAND JURY CHARGES:**

COUNT ONE  
[21 U.S.C. §§ 841, 846]

Beginning on or about January 1, 1999 and continuing through and including the date of  
this indictment, in the Western District of Texas, the Northern District of Texas, the Republic of  
Mexico, and elsewhere, the Defendant,

**JUAN MANUEL MUNOZ-LUEVANO aka "EL INGENIERO"  
aka "EL INGE" aka "MONO" aka "THE ENGINEER" aka "MANUELITO"**

did combine, conspire, confederate and agree together and with each other and others known and unknown to the Grand Jury to possess with intent to distribute and distribute a controlled substance, which offense involved 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, with intent to distribute same, contrary to Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A)(ii).

**COUNT TWO**  
**(21 U.S.C. §§ 952(a), 960(a)(1), 960(b)(1)(G) & 963)**

That beginning on or about January 1, 1999 and continuing through and including the date of this indictment, in the Western District of Texas, Defendant,

**JUAN MANUEL MUNOZ-LUEVANO aka “EL INGENIERO”  
aka “EL INGE” aka “MONO” aka “THE ENGINEER” aka “MANUELITO”**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with each other, and with others to the Grand Jury unknown, to commit offenses against the United States, in violation of Title 21, United States Code, Section 963, that is to say, they conspired to import a controlled substance, which offense involved five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, into the United States from Mexico, contrary to Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(1)(B).

**COUNT THREE**  
**(21 U.S.C. §§ 959(a), 963, 960(a)(3) and (b)(1)(G))**

Beginning on or about January 1, 1999, and continuing through and including the date of this indictment, in the Republic of Mexico and elsewhere, Defendant,

**JUAN MANUEL MUNOZ-LUEVANO aka “EL INGENIERO”  
aka “EL INGE” aka “MONO” aka “THE ENGINEER” aka “MANUELITO”**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with each other, and with others to the Grand Jury unknown, to commit offenses against the United States, in violation of Title 21, United States Code, Section 963, that is to say, they conspired to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, intending and knowing that said controlled substance would be unlawfully imported into the United States, in violation of Title 21, United States Code, Section 959.

**COUNT FOUR**

(21 U.S.C. § 841(a)(1) and (b); 18 U.S.C. § 2)

That on or about December 5, 2011, in the Western District of Texas, Defendant,

**JUAN MANUEL MUNOZ-LUEVANO aka “EL INGENIERO”  
aka “EL INGE” aka “MONO” aka “THE ENGINEER” aka “MANUELITO”**

knowingly and intentionally possessed with intent to distribute a controlled substance, and aided and abetted the knowing and intentional possession with intent to distribute a controlled substance, which offense involved five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii).

**COUNT FIVE**

(18 U.S.C. §§ 924(c)(1) and (o))

Beginning on or about January 1, 2007, and continuing through and including the date of this indictment, in the Western District of Texas and elsewhere, the Defendant,

**JUAN MANUEL MUNOZ-LUEVANO aka “EL INGENIERO”  
aka “EL INGE” aka “MONO” aka “THE ENGINEER” aka “MANUELITO”**

knowingly combined, conspired, confederated, and agreed with each other and others known and unknown to the Grand Jury to commit offenses against the United States, that is, the **DEFENDANTS** conspired to possess firearms in furtherance of the drug trafficking crimes

charged in Counts One, Two, Three and Four of this Indictment, re-alleged herein, contrary to Title 18, United States Code, Sections 924(c)(1) and (o).

**COUNT SIX**

(18 U.S.C. §§ 1956 (a)(1)(A)(i) & (ii) and 1956(h))

Beginning on or about January 1, 1999, and continuing through and including the date of this indictment, in the Western District of Texas and elsewhere, the Defendant,

**JUAN MANUEL MUNOZ-LUEVANO aka "EL INGENIERO"  
aka "EL INGE" aka "MONO" aka "THE ENGINEER" aka "MANUELITO"**

did knowingly conspire with others known and unknown to the Grand Jury to conduct and to attempt to conduct financial transactions, affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, to-wit: drug trafficking violations of Title 21, United States Code, Sections 846 and 841(a)(1), with the intent to promote the carrying on of the specified unlawful activity knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

A TRUE BILL.

  
FOREPERSON OF THE GRAND JURY

ROBERT PITMAN  
UNITES STATES ATTORNEY

  
RUSSELL D. LEACHMAN  
Assistant United States Attorney