

ORIGINAL

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

UNITED STATES OF AMERICA

v.

SAMUEL GEORGE HURD, III (01)
TOBY LUJAN (02)

§
§
§
§
§
§

3-12 CR-003 P

DEPUTY CLERK
2012 JAN -4 PM 4:02
[Signature]

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or about July 2011, the exact date being unknown to the Grand Jury, and continuing to on or about December 14, 2011, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Samuel George Hurd, III and Toby Lujan**, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together, and with other persons known and unknown to the Grand Jury, to possess with the intent to distribute five kilograms or more of 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 (b)(1)(A)(ii)(II).

In violation of 21 U.S.C. § 846.

Count Two

Attempt to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

On or about December 14, 2011, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Samuel George Hurd, III and Toby Lujan**, did knowingly and intentionally attempt to possess with intent to distribute 500 or more grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(b)(1)(B)(ii)(II).

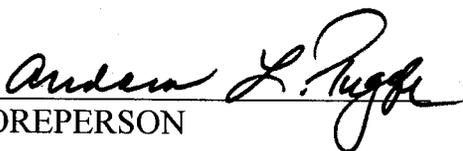
In violation of 21 U.S.C. § 846.

Forfeiture Notice
(21 U.S.C. § 853(a))

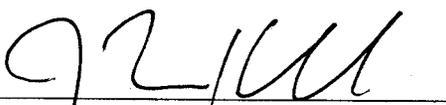
Upon conviction of either of the offenses alleged in Count One or Two of this Indictment, the defendants, **Samuel George Hurd, III and Toby Lujan**, shall forfeit to the United States all property, real or personal, constituting, or derived from, the proceeds obtained, directly or indirectly, as a result of the respective offense; and any property, real or personal, used or intended to be used, in any manner or part, to commit or to facilitate the commission of the respective offense. This property includes, but is not limited to, the following:

- (1) \$88,000 in United States currency seized from Toby Lujan on July 27, 2011.
- (2) A 2010 Cadillac Escalade, VIN: 1GYUKCEFXAR259113, seized from Samuel George Hurd, III on December 14, 2011.

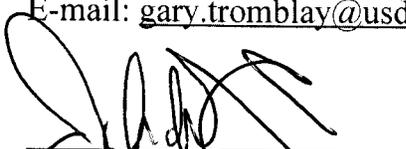
A TRUE BILL.


FOREPERSON

SARAH R. SALDAÑA
UNITED STATES ATTORNEY


JOHN KULL
Assistant United States Attorney
Texas State Bar No. 00791057
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8600
Facsimile: 214.659.8803
E-mail: john.kull@usdoj.gov


GARY C. TROMBLAY
Assistant United States Attorney
Louisiana Bar Roll No. 22665
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8638
Facsimile: 214.767.4913
E-mail: gary.tromblay@usdoj.gov


JOHN DE LA GARZA
Assistant United States Attorney
Texas State Bar No. 00796455
1100 Commerce, Third Floor
Dallas, TX 75242
Telephone: 214.659.8682
Facsimile: 214.659.8803

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

THE UNITED STATES OF AMERICA

v.

SAMUEL GEORGE HURD, III (1)
TOBY LUJAN (2)

INDICTMENT

18 U.S.C. § 846
Conspiracy to Possess with Intent to Distribute a Controlled Substance

18 U.S.C. § 846
Attempt to Possess with Intent to Distribute a Controlled Substance

21 U.S.C. § 853(a)
Forfeiture Notice

2 Counts

A true bill rendered

DALLAS

Arden L. Fugle
FOREPERSON

Filed in open court this _____ day of January, 2012

Clerk

PLEASE ISSUE ARREST WARRANT FOR TOBY LUJAN; Hurd is on Bond

Emo Camillo - 1-4-12

UNITED STATES DISTRICT/MAGISTRATE JUDGE

Magistrate case Pending in Chicago - 0752 1:11-00875-0001

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

ORIGINAL

Related Case Information

Superseding Indictment: Yes No New Defendant: Yes No
Pending CR Case in NDTX: Yes No If Yes, number:
Search Warrant Case Number _____
R 20 from District of _____
Magistrate Case Number: 0752 1:11-CR-00875-0001 (Chicago)

1. Defendant Information

Juvenile: Yes No

If Yes, Matter to be sealed:

Yes No

Defendant Name Samuel George Hurd, III (1)

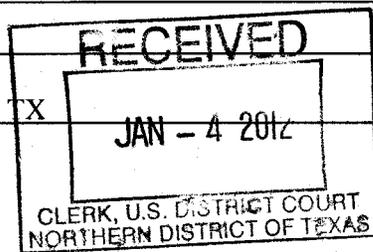
Alias Name _____

Address _____

County in which offense was committed: Cook County, IL and Dallas, TX

2. U.S. Attorney Information

John Kull Bar #: TX 00791057



3. Interpreter

Yes No If Yes, list language and/or dialect: _____

4. Location Status -On Bond

- Already in Federal Custody as of
- Already in State Custody
- On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 2 Petty Misdemeanor Felony

Citation	Description of Offense Charged	Count(s)
21 USC § 846	Conspiracy to Possess with Intent to Distribute a Controlled Substance	1
21 USC § 846	Attempt to Possess with Intent to Distribute a Controlled Substance	2
21 USC § 853(a)	Forfeiture Notice	

Date 1/3/12

Signature of AUSA: [Handwritten Signature]

ORIGINAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

Related Case Information

Superseding Indictment: Yes No New Defendant: Yes No
Pending CR Case in NDTX: Yes No If Yes, number:
Search Warrant Case Number **3-12CR-003-P**
R 20 from District of _____
Magistrate Case Number: _____

1. Defendant Information

Juvenile: Yes No
If Yes, Matter to be sealed:
 Yes No

Defendant Name Toby Lujan (2)
Alias Name _____
Address _____

RECEIVED
JAN - 4 2012
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

County in which offense was committed: Cook County, IL and Dallas, TX

2. U.S. Attorney Information

John Kull Bar #: TX 00791057

3. Interpreter

Yes No If Yes, list language and/or dialect: _____

4. Location Status -ARREST WARRANT NEEDED

Already in Federal Custody as of
 Already in State Custody
 On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 2 Petty Misdemeanor Felony

Citation	Description of Offense Charged	Count(s)
21 USC § 846	Conspiracy to Possess with Intent to Distribute a Controlled Substance	1
21 USC § 846	Attempt to Possess with Intent to Distribute a Controlled Substance	2
21 USC § 853(a)	Forfeiture Notice	

Date 1/3/12

Signature of AUSA: [Signature]