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FILED
DISTRICT COURT OF GUAM

MAY 07 2025

JEANNE G. QUINATA
CLERK OF COURT

Attorneys for the United States of America

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF GUAM

UNITED STATES OF AMERICA,

CRIMINAL CASE NO. **25-00004**

INDICTMENT

Plaintiff,

FAILURE TO REGISTER AN AIRCRAFT
[49 U.S.C. § 46306(b)(6)(A)]
(Count 1)

vs.

**VIOLATION OF NATIONAL DEFENSE
AIRSPACE**
[49 U.S.C. §§ 46307 and 40103]
(Count 2)

BILLY CAO CRUZ,

Defendant.

NOTICE OF FORFEITURE
[49 U.S.C. § 46306 & 28 U.S.C. § 2461(c)]

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At times material to this Indictment:

COUNT 1: FAILURE TO REGISTER AN AIRCRAFT

On or about February 1, 2025, in the District of Guam, the Defendant BILLY CAO CRUZ, knowingly and willfully operated an aircraft eligible for registration with the Federal Aviation Administration under Title 49, United States Code, Section 44102, namely, a DJI Mavic Mini 4 Pro unmanned aerial vehicle with serial number 1581F6Z9C239P00399UT, knowing that the

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1 aircraft was not registered under Title 49, United States Code, Section 44103.

2 **COUNT 2: VIOLATION OF NATIONAL DEFENSE AIRSPACE**

3 On or about February 1, 2025, in the District of Guam, the Defendant BILLY CAO CRUZ,
4 knowingly and willfully operated an aircraft, namely, a DJI Mavic Mini 4 Pro unmanned aerial
5 vehicle with serial number 1581F6Z9C239P00399UT, in National Defense Airspace around Camp
6 Blaz, United States Marine Corps Base, Guam, in violation of Title 49, United States Code,
7 Sections 46307 and 40103, and Title 14, Code of Federal Regulations, Section 99.7, a regulation
8 prescribed under Title 49, United States Code, Section 40103(b)(3).

9 **NOTICE OF FORFEITURE**

10 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby
11 given that the United States will seek forfeiture as part of any sentence, pursuant to Title 49, United
12 States Code, Section 46306(d) and Title 28, United States Code, Section 2461(c), in the event of
13 the Defendant's conviction of the offense set forth in Count One of this Indictment.

14 2. The Defendant, if so convicted, shall forfeit to the United States the following:

15 (a) All right, title, and interest in any and all aircraft whose use relates to such offense;

16 (b) All right, title and interest in any and all aircraft, used, or intended to be used to aid
17 or facilitate the commission of any such offense; and

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

20 3. If any of the property described above, as a result of any act or omission of the
21 Defendant:

22 (a) cannot be located upon the exercise of due diligence;

23 (b) has been transferred, sold to, or deposited with a third party;

24 (c) has been placed beyond the jurisdiction of the court;

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1 (d) has been substantially diminished in value; or

2 (e) has been commingled with other property that cannot be divided without difficulty,
3 the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United
4 States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

5 All pursuant to Title 49, United States Code, Section 46306(d) and Title 28, United States
6 Code, Section 2461(c).

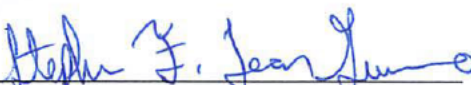
7 DATED this 7th day of May, 2025.

8 A TRUE BILL.

9 **Redacted**

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11 SHAWN N. ANDERSON
12 United States Attorney
13 Districts of Guam and the NMI

14 By:


15 STEPHEN F. LEON GUERRERO
16 Assistant U.S. Attorney
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