

FILED IN OPEN COURT

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MAY 24 2019

SEALED

Holding a Criminal Term

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

Grand Jury Sworn in on May 7, 2019

UNITED STATES OF AMERICA

v.

VLADIMIR PADRINO LOPEZ

)
) CRIMINAL NO. _____

)
) UNDER SEAL

)
) VIOLATIONS:

)
) 21 U.S.C. §§ 959(c), 960, 963
) (Conspiracy to Distribute and Possess
) with Intent to Distribute Five
) Kilograms or More of Cocaine On
) Board an Aircraft Registered in the
) United States)

)
) 18 U.S.C. § 2

)
) 21 U.S.C. § 853

)
) 21 U.S.C. § 970
) (Forfeiture)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Case: 1:19-cr-00176
Assigned To : Judge Moss, Randolph D.
Assign. Date : 5/24/2019
Description: INDICTMENT (B)

From in or about March 2014, and continuing up to and including the date of the filing of
this Indictment, the exact dates being unknown to the Grand Jury, in Belize, Guatemala,

Venezuela, Mexico, Honduras, the United States and elsewhere, the Defendants VLADIMIR

PADRINO LOPEZ

and others known
and unknown to the Grand Jury, did knowingly, willfully, and intentionally combine, conspire,
confederate, and agree to commit the following offense against the United States: to knowingly

and intentionally distribute and possess with intent to distribute, on board an aircraft registered in the United States, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 959(c) and 960(b)(1)(B)(ii); all in violation of Title 21, United States Code, Section 963, and Title 18, United States Code, Section 2.

With respect to each defendant, the controlled substance involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is five kilograms or more of a mixture and substance containing a detectable amount of cocaine in violation of Title 21, United States Code, Section 960(b)(1)(B)(ii).

(Conspiracy to Distribute and Possess with Intent to Distribute Five Kilograms or More of Cocaine on Board an Aircraft Registered in the United States, in violation of Title 21, United States Code, Sections 959(c), 960(b)(1)(B)(ii), and 963, and Title 18, United States Code, Section 2)

FORFEITURE ALLEGATION

The United States hereby gives notice to the defendants that upon conviction of the Title 21 offense alleged in Count One of this Indictment, the government will seek forfeiture in accordance with Title 21, United States Code, Sections 853 and 970, of all property constituting or derived from any proceeds each defendants obtained directly or indirectly as a result of the alleged Title 21 violation, and all property used or intended to be used in any manner or part to commit and to facilitate the commission of such offense.

Said property includes, but is not limited to:

A sum of money equal to all proceeds the defendants obtained directly or indirectly as a result of the Title 21 offense charged in this indictment, and all property used or intended to be used to facilitate such offense, that is, not less than a sum of money representing the amount of funds

involved in the offense, and all interest and proceeds traceable thereto; in that such sum, in aggregate, was received by the defendants in exchange for the distribution of controlled substances or is traceable thereto. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

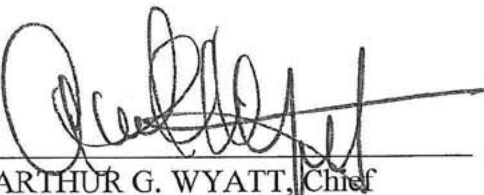
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the said defendants up to the value of the above forfeitable property.

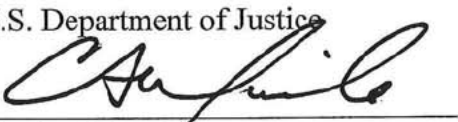
(Criminal Forfeiture, in violation of Title 21, United States Code, Sections 853 and 970)

A TRUE BILL:

FOREPERSON


ARTHUR G. WYATT, Chief
Narcotic and Dangerous Drug Section
Criminal Division
U.S. Department of Justice

By:


Charles Miracle
Acting Deputy Chief
Narcotic and Dangerous Drug Section
Criminal Division
U.S. Department of Justice
Washington, D.C. 20530

U.S. District and Bankruptcy Courts
for the District of Columbia
A TRUE COPY
ANGELA D. CAESAR, Clerk
By 
Deputy Clerk