

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on July 9, 2018

UNITED STATES OF AMERICA

v.

ALER BALDOMERO SAMAYOA-
RECINOS,

also known as
"Chicharra,"

Defendant.

CRIMINAL NO. _____

UNDER SEAL

21 U.S.C. §§959(a), 960, and 963
(Conspiracy to distribute five kilograms of
cocaine for importation into the United
States)

18 U.S.C. § 2 (Aiding and Abetting)

21 U.S.C. §§ 853 and 970
(Forfeiture)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Beginning in or around 2006 and continuing thereafter, up to in or around 2016, the exact dates being unknown to the Grand Jury, in the country of Mexico, Honduras, Guatemala, and elsewhere, the Defendant, ALER BALDOMERO SAMAYOA-RECINOS, also known as "Chicharra," and others known and unknown to the Grand Jury, did knowingly, intentionally, and willfully combine, conspire, confederate and agree to: distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending, knowing, and having reasonable cause to believe that such substances would

be unlawfully imported into the United States from a place outside thereof, in violation of Title 21, United States Code, Section 959(a); all in violation of Title 21, United States Code, Section 963; and Title 18, United States Code, Section 2.

With respect to the Defendant, the controlled substances involved in the conspiracy attributable to the Defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 960(b)(1)(B)(ii).

(Conspiracy to Distribute 5 Kilograms or More of Cocaine Intending, Knowing, and Having Reasonable Cause to Believe that such substance will be Unlawfully Imported into the United States, in violation of Title 21, United States Code, Sections 959(a), and 963, and aiding and abetting in violation of Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATION

The United States hereby gives notice to the Defendant 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 the Defendant obtained directly or indirectly as the 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.

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;

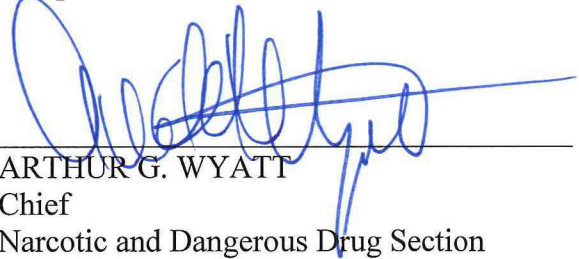
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

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 Defendant up to the value of the above forfeitable property.

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

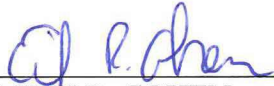
A TRUE BILL:

Foreperson



ARTHUR G. WYATT
Chief
Narcotic and Dangerous Drug Section
U.S. Department of Justice
Washington, D.C. 20530

By: _____



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