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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

Unsealed per Order of the Court on
3/16/2022 (fth)

BY: *VZL* DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

June 2017 Grand Jury

18 CR 470 1 DMS

UNITED STATES OF AMERICA,

Case No. _____

Plaintiff,

I N D I C T M E N T

v.

Title 21, U.S.C.,
Secs. 959, 960 and 963 -
International Conspiracy to
Distribute Controlled Substances;
Title 46, U.S.C., Secs. 70503
and 70506(b) - Conspiracy to
Distribute Cocaine on Board a
Vessel; Title 21, U.S.C.,
Sec. 853, and Title 46, U.S.C.,
Sec. 70507(a) - Criminal Forfeiture

AXEL BLADIMIR MONTEJO SAENZ,

aka Mosh,
aka Kraken,
aka Gladiator,
aka Baraja,
aka Solin,
aka Ron Zacapa,
aka Captain Morgan,
aka Corralejo,

Defendant.

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing up to
and including November 2018, in the countries of Colombia, Ecuador,
Guatemala, Costa Rica, El Salvador, and Mexico and elsewhere, defendant
AXEL BLADIMIR MONTEJO SAENZ, aka Mosh, aka Kraken, aka Gladiator,
aka Baraja, aka Solin, aka Ron Zacapa, aka Captain Morgan, aka Corralejo,
who will be arrested and first brought to the Southern District of
California, did knowingly and intentionally conspire with other persons

1 alf

1 known and unknown to the grand jury to distribute and cause the
2 distribution of a controlled substance, to wit: 5 kilograms and more of
3 a mixture and substance containing a detectable amount of cocaine, a
4 Schedule II Controlled Substance; intending, knowing, and having
5 reasonable cause to believe that such cocaine would be unlawfully
6 imported into the United States; all in violation of Title 21, United
7 States Code, Sections 959, 960, and 963.

8 Count 2

9 Beginning at a date unknown to the grand jury and continuing to on
10 or about November 2018, on board a vessel subject to the jurisdiction
11 of the United States, and upon the high seas, defendant AXEL BLADIMIR
12 MONTEJO SAENZ, aka Mosh, aka Kraken, aka Gladiator, aka Baraja,
13 aka Solin, aka Ron Zacapa, aka Captain Morgan, aka Corralejo did
14 knowingly and intentionally conspire with other persons known and
15 unknown to the grand jury to distribute 5 kilograms and more of a mixture
16 and substance containing a detectable amount of cocaine, a Schedule II
17 Controlled Substance; in violation of Title 46, United States Code,
18 Sections 70503 and 70506(b).

19 Criminal Forfeiture Allegations

- 20 1. The allegations contained in Counts 1 and 2 are realleged and
21 by reference fully incorporated herein for the purpose of
22 alleging forfeiture to the United States of America pursuant
23 to the provisions of Title 21, United States Code,
24 Section 853, and Title 46, United States Code,
25 Section 70507(a).
- 26 2. As a result of the commission of the felony offense alleged
27 in Count 1 of this Indictment, said violation being punishable
28 by imprisonment for more than one year and pursuant to

1 Title 21, United States Code, Sections 853(a)(1) and
2 853(a)(2), defendant AXEL BLADIMIR MONTEJO SAENZ, aka Mosh,
3 aka Kraken, aka Gladiator, aka Baraja, aka Solin, aka Ron
4 Zacapa, aka Captain Morgan, aka Corralejo, shall, upon
5 conviction, forfeit to the United States all his rights, title
6 and interest in any and all property constituting, or derived
7 from, any proceeds the defendant obtained, directly or
8 indirectly, as the result of the offense, and any and all
9 property used or intended to be used in any manner or part to
10 commit and to facilitate the commission of the violation
11 alleged in this indictment.

12 3. As a result of the commission of the offense alleged in Count 2
13 of this Indictment, and pursuant to Title 46, United States
14 Code, Section 70507(a), defendant AXEL BLADIMIR MONTEJO SAENZ,
15 aka Mosh, aka Kraken, aka Gladiator, aka Baraja, aka Solin,
16 aka Ron Zacapa, aka Captain Morgan, aka Corralejo, shall, upon
17 conviction, forfeit to the United States any property used or
18 intended to be used to commit or to facilitate the commission
19 of the violation.

20 4. If any of the above-described forfeitable property, as a
21 result of any act or omission of the defendant:

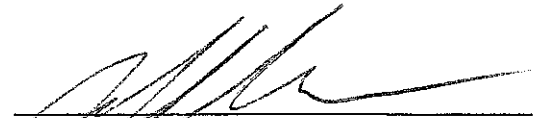
- 22 a. cannot be located upon the exercise of due diligence;
23 b. has been transferred or sold to, or deposited with, a
24 third party;
25 c. has been placed beyond the jurisdiction of the Court;
26 d. has been substantially diminished in value; or
27 e. has been commingled with other property which cannot be
28 subdivided without difficulty;

1 it is the intent of the United States, pursuant to Title 21,
2 United States Code, Section 853(p), to seek forfeiture of any other
3 property of the defendant up to the value of the property listed above
4 as being subject to forfeiture.

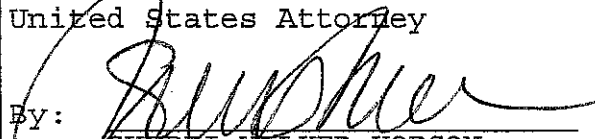
5 All in violation of Title 21, United States Code, Section 853, and
6 Title 46, United States Code, Section 70507(a).

7 DATED: November 1, 2018.

8 A TRUE BILL:

9
10 
Foreperson

11 ADAM L. BRAVERMAN
12 United States Attorney

13 By: 
14 SHERRI WALKER HOBSON
Assistant U.S. Attorney

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