

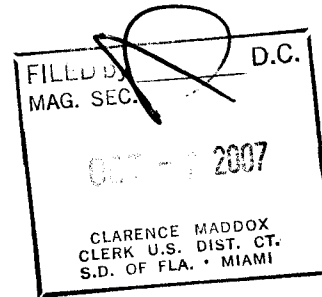
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

07 - 20794 CR - LENARD / TORRES
Case No.

21 U.S.C. § 963
18 U.S.C. § 1956
46 U.S.C. § 70506(b)
46 U.S.C. § 70503(a)
21 U.S.C. § 853
18 U.S.C. § 982
46 U.S.C. § 70507

UNITED STATES OF AMERICA

vs.



CARLOS MARIO JIMENEZ NARANJO,
a/k/a "Macaco,"
a/k/a "La Gerencia,"
a/k/a "Commander Javier Montañes,"
a/k/a "Carlos Mario Jimenez Mejia,"
a/k/a "Macaco Montañez,"

SAMMY HUMBERTO FERNANDEZ NAVARRO,
ROSA EDELMIRA LUNA CORDOBA,
a/k/a "Norma,"
a/k/a "La Señora,"
a/k/a "La Subgerencia,"

MARCO JULIO LONDOÑO VASQUEZ,
a/k/a "Canosito,"

FRANCISCO ARTURO ORTIZ NAVARRO,
a/k/a "Maestro,"

MELBIN CAICEDO SANCHEZ,
a/k/a "Pelos,"

ELKIN DARIO GUERRERO AGAMEZ,
a/k/a "El Brujo,"

NEBARDO ANTONIO ESTRADA MUÑOZ,
a/k/a "Poty,"

FERNANDO ABUCHAR GONZALEZ,
a/k/a "Mello,"

MARCIAL GAMBOA ESCOBAR,
a/k/a "Marcial,"

ENOT CHAVERRA VARGAS,
a/k/a "Bemba,"

ELKIN DARIO CANTILLO SALAS,
a/k/a "33,"

HECTOR EDUARDO SALAZAR MUÑOZ,
a/k/a "Villazon,"
and
SANTANDER MARTINEZ CORTECERO,
a/k/a "Santa,"

Defendants.

INDICTMENT

The Grand Jury charges that:

COUNT 1

Beginning in or about October 2004, and continuing through in about June 2007, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

CARLOS MARIO JIMENEZ NARANJO,
a/k/a "Macaco,"
a/k/a "La Gerencia,"
a/k/a "Commander Javier Montañes,"
a/k/a "Carlos Mario Jimenez Mejia,"
a/k/a "Macaco Montañez,"
and
SAMMY HUMBERTO FERNANDEZ NAVARRO,

did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons, known and unknown to the Grand Jury, to import into the United States from a place outside thereof a controlled substance, in violation of Title 21, United States Code, Section 952(a); all in violation of Title 21, United States Code, Section 963.

Pursuant to Title 21, United States Code, Section 960(b)(1)(B), it is further alleged that this violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine.

COUNT 2

From in or about January 2005, through in or about June 2007, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**CARLOS MARIO JIMENEZ NARANJO,
a/k/a "Macaco,"
a/k/a "La Gerencia,"
a/k/a "Commander Javier Montañes,"
a/k/a "Carlos Mario Jimenez Mejia,"
a/k/a "Macaco Montañes,"**

did knowingly combine, conspire, confederate, and agree with other persons, known and unknown to the Grand Jury, to commit certain offenses against the United States, in violation of Title 18, United States Code, Section 1956, namely:

(a) to knowingly conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, with the intent to promote the carrying on of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);

(b) to knowingly conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(c) to knowingly transport, transmit and transfer a monetary instrument and funds to a place in the United States from and through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

It is further alleged that the specified unlawful activity is the felonious importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance, punishable under the laws of the United States.

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS 3 - 10

On or about the dates specified as to each count below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**CARLOS MARIO JIMENEZ NARANJO,
a/k/a "Macaco,"
a/k/a "La Gerencia,"
a/k/a "Commander Javier Montañes,"
a/k/a "Carlos Mario Jimenez Mejia,"
a/k/a "Macaco Montañes,"**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, as described in each count below, involving the proceeds of specified unlawful activity,

- (a) with the intent to promote the carrying on of specified unlawful activity; and
- (b) knowing that the transaction is designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity:

COUNT	APPROXIMATE DATE	DESCRIPTION OF FINANCIAL TRANSACTION
3	7/25/2005	A wire transfer of approximately \$8,493 from an account at Casa De Cambio Puebla Reforma, SA in Mexico through Miami, Florida, to an account at Bank of America in Oklahoma City, Oklahoma.
4	7/25/2005	A wire transfer of approximately \$66,964 from an account at Casa De Cambio Puebla Reforma, SA in Mexico through Miami, Florida, to an account at Bank of America in Oklahoma City, Oklahoma.
5	7/25/2005	A wire transfer of approximately \$92,840 from an account at Casa De Cambio Puebla Reforma, SA in Mexico through Miami, Florida, to an account at Bank of America in Oklahoma City, Oklahoma.
6	7/26/2005	A wire transfer of approximately \$95,762 from an account at Casa De Cambio Puebla Reforma, SA in Mexico through Miami, Florida, to an account at Bank of America in Oklahoma City, Oklahoma.
7	7/26/2005	A wire transfer of approximately \$91,507 from an account at Casa De Cambio Puebla Reforma, SA in Mexico through Miami, Florida, to an account at Bank of America in Oklahoma City, Oklahoma.
8	7/26/2005	A wire transfer of approximately \$59,434 from an account at Casa De Cambio Puebla Reforma, SA in Mexico through Miami, Florida, to an account at Bank of America in Oklahoma City, Oklahoma.
9	7/26/2005	A wire transfer of approximately \$50,566 from an account at Bank of America in Oklahoma City, Oklahoma, to an account at Bank United in Coral Gables, Florida.
10	7/26/2005	A wire transfer of approximately \$59,434 from an account at Bank of America in Oklahoma City, Oklahoma through Miami, Florida, to an account at Casa De Cambio Puebla Reforma, SA in Mexico.

It is further alleged that the specified unlawful activity is the felonious importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance, punishable under the laws of the United States.

and 2. *IN* All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i)

COUNTS 11 - 17

On or about the dates specified as to each count below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

CARLOS MARIO JIMENEZ NARANJO,
a/k/a "Macaco,"
a/k/a "La Gerencia,"
a/k/a "Commander Javier Montañes,"
a/k/a "Carlos Mario Jimenez Mejia,"
a/k/a "Macaco Montañez,"

as described in each count below, did knowingly transport, transmit, and transfer a monetary instrument and funds to a place in the United States from a place outside of the United States and from a place in the United States to or through a place outside the United States with the intent to promote the carrying on of specified unlawful activity:

COUNT	APPROXIMATE DATE	DESCRIPTION OF FINANCIAL TRANSACTION
11	7/25/2005	A wire transfer of approximately \$8,493 from an account at Casa De Cambio Puebla Reforma, SA in Mexico through Miami, Florida, to an account at Bank of America in Oklahoma City, Oklahoma.
12	7/25/2005	A wire transfer of approximately \$66,964 from an account at Casa De Cambio Puebla Reforma, SA in Mexico through Miami, Florida, to an account at Bank of America in Oklahoma City, Oklahoma.
13	7/25/2005	A wire transfer of approximately \$92,840 from an account at Casa De Cambio Puebla Reforma, SA in Mexico through Miami, Florida, to an account at Bank of America in Oklahoma City, Oklahoma.
14	7/26/2005	A wire transfer of approximately \$95,762 from an account at Casa De Cambio Puebla Reforma, SA in Mexico through Miami, Florida, to an account at Bank of America in Oklahoma City, Oklahoma.

15	7/26/2005	A wire transfer of approximately \$91,507 from an account at Casa De Cambio Puebla Reforma, SA in Mexico through Miami, Florida, to an account at Bank of America in Oklahoma City, Oklahoma.
16	7/26/2005	A wire transfer of approximately \$59,434 from an account at Casa De Cambio Puebla Reforma, SA in Mexico through Miami, Florida, to an account at Bank of America in Oklahoma City, Oklahoma.
17	7/26/2005	A wire transfer of approximately \$59,434 from an account at Bank of America in Oklahoma City, Oklahoma through Miami, Florida, to an account at Casa De Cambio Puebla Reforma, SA in Mexico.

It is further alleged that the specified unlawful activity is the felonious importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance, punishable under the laws of the United States.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A), and 2.

COUNT 18

Beginning at least as early as in or about September 2006, the exact date being unknown to the Grand Jury, and continuing until at least on or about September 6, 2007, the defendants,

CARLOS MARIO JIMENEZ NARANJO,
 a/k/a "Macaco,"
 a/k/a "La Gerencia,"
 a/k/a "Commander Javier Montañes,"
 a/k/a "Carlos Mario Jimenez Mejia,"
 a/k/a "Macaco Montañes,"
ROSA EDELMIRA LUNA CORDOBA,
 a/k/a "Norma,"
 a/k/a "La Señora,"
 a/k/a "La Subgerencia,"
MARCO JULIO LONDOÑO VASQUEZ,
 a/k/a "Canosito,"
FRANCISCO ARTURO ORTIZ NAVARRO,
 a/k/a "Maestro,"
MELBIN CAICEDO SANCHEZ,
 a/k/a "Pelos,"

ELKIN DARIO GUERRERO AGAMEZ,
a/k/a “El Brujo,”
NEBARDO ANTONIO ESTRADA MUNOZ,
a/k/a “Poty,”
FERNANDO ABUCHAR GONZALEZ,
a/k/a “Mello,”
MARCIAL GAMBOA ESCOBAR,
a/k/a “Marcial,”
ENOT CHAVERRA VARGAS,
a/k/a “Bemba,”
ELKIN DARIO CANTILLO SALAS,
a/k/a “33,”
HECTOR EDUARDO SALAZAR MUÑOZ,
a/k/a “Villazon,”
and
SANTANDER MARTINEZ CORTECERO,
a/k/a “Santa,”

did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons, known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance on board a vessel subject to the jurisdiction of the United States, in violation of Title 46, United States Code, Section 70503(a); all in violation of Title 46, United States Code, Section 70506(b).

Pursuant to Title 46, United States Code, Section 70506(a) and Title 21, United States Code, Section 960(b)(1)(B), it is further alleged that this violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine.

COUNT 19

On or about December 19, 2006, the defendants,

CARLOS MARIO JIMENEZ NARANJO,
a/k/a "Macaco,"
a/k/a "La Gerencia,"
a/k/a "Commander Javier Montañes,"
a/k/a "Carlos Mario Jimenez Mejia,"
a/k/a "Macaco Montanez,"
ROSA EDELMIRA LUNA CORDOBA,
a/k/a "Norma,"
a/k/a "La Señora,"
a/k/a "La Subgerencia,"
MARCO JULIO LONDOÑO VASQUEZ,
a/k/a "Canosito,"
FRANCISCO ARTURO ORTIZ NAVARRO,
a/k/a "Maestro,"
ELKIN DARIO GUERRERO AGAMEZ,
a/k/a "El Brujo,"
ENOT CHAVERRA VARGAS,
a/k/a "Bemba,"
and
HECTOR EDUARDO SALAZAR MUÑOZ,
a/k/a "Villazon,"

did knowingly and intentionally possess with intent to distribute a controlled substance on board a vessel subject to the jurisdiction of the United States, in violation of Title 46, United States Code, Section 70503(a) and Title 18, United States Code, Section 2.

Pursuant to Title 46, United States Code, Section 70506(a) and Title 21, United States Code, Section 960(b)(1)(B), it is further alleged that this violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine.

COUNT 20

On or about April 26, 2007, the defendants,

CARLOS MARIO JIMENEZ NARANJO,
a/k/a "Macaco,"
a/k/a "La Gerencia,"
a/k/a "Commander Javier Montañes,"
a/k/a "Carlos Mario Jimenez Mejia,"
a/k/a "Macaco Montañez,"
ROSA EDELMIRA LUNA CORDOBA,
a/k/a "Norma,"
a/k/a "La Senora,"
a/k/a "La Subgerencia,"
MARCO JULIO LONDOÑO VASQUEZ,
a/k/a "Canosito,"
FRANCISCO ARTURO ORTIZ NAVARRO,
a/k/a "Maestro,"
ELKIN DARIO GUERRERO AGAMEZ,
a/k/a "El Brujo,"
ENOT CHAVERRA VARGAS,
a/k/a "Bemba,"
and
SANTANDER MARTINEZ CORTECERO,
a/k/a "Santa,"

did knowingly and intentionally possess with intent to distribute a controlled substance on board a vessel subject to the jurisdiction of the United States, in violation of Title 46, United States Code, Section 70503(a) and Title 18, United States Code, Section 2.

Pursuant to Title 46, United States Code, Section 70506(a) and Title 21, United States Code, Section 960(b)(1)(B), it is further alleged that this violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine.

ASSET FORFEITURE ALLEGATIONS

1. The allegations of Counts 1 through 20 of this Indictment are re-alleged and incorporated herein for the purpose of alleging forfeiture to the United States of America of property in which the defendants have an interest. The property subject to forfeiture includes, but is not limited to the following:

(a) \$117,446,000 of United States Currency.

2. Upon conviction of any violation of Title 21, United States Code, Section 963, the defendants shall forfeit to the United States any property constituting or derived from any proceeds obtained, directly or indirectly, as the result of such violations, and any property which the defendants used or intended to be used in any manner or part to commit or to facilitate the commission of such violations, pursuant to Title 21, United States Code, Sections 853(a)(1) and (2).

3. Upon conviction of any violation of Title 18, United States Code, Section 1956, the defendants shall forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

4. Upon conviction of any violation of Title 46, United States Code, Sections 70506 or 70503, the defendants shall forfeit to the United States, any property that is used or intended for use to commit, or to facilitate the commission of, such violations, pursuant to Title 46, United States Code, Section 70507(a), as made applicable by Title 28, United States Code, Section 2461(c).

5. Pursuant to Title 21 United States Code, Section 853(p), and as incorporated by reference by Title 18, United States Code, Section 982(b), if any of the forfeitable property, or any portion thereof, as a result of any act or omission of any defendant:


- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred, or sold to, or deposited with a third party;
- (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 to seek the forfeiture of other property of the defendants up to the value of the above-described forfeitable property.

All pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 982, and Title 46, United States Code, Section 70507(a), as made applicable by Title 28, United States Code, Section 2461(c) .

A TRUE BILL

FOREPERSON



R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY



ALEJANDRO SOTO
ASSISTANT UNITED STATES ATTORNEY



ANDREA G. HOFFMAN
ASSISTANT UNITED STATES ATTORNEY



TODD W. MESTEPEY
ASSISTANT UNITED STATES ATTORNEY