UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

06 CASE NO. 20001 CR-LENARD / KLEIN

18 U.S.C. § 2339B(a)(1)
18 U.S.C. § 371
8 U.S.C. § 1324(a)(2)(B)(ii)
8 U.S.C. § 1324(a)(1)(A)(iv)
18 U.S.C. § 2(a)
18 U.S.C. § 1956(h)
18 U.S.C. § 1956(a)(3)(A)

UNITED STATES OF AMERICA,

v.

FILED by D.C.
MAG. SEC.
JAN - 3 2006
CLARENCE MADDOX
CLERK U.S. DIST. CT.
S.D. OF FLA. • MIAMI

VICTOR DANIEL SALAMANCA,
a/k/a "El Viejito," a/k/a "Don Daniel,"
a/k/a "José Gustavo Ruiz Quijano,"
JULIO CESAR LOPEZ,
JALAL SAADAT MOHEISEN,
a/k/a "Jacki,"
BERNARDO VALDES LONDOÑO,
a/k/a "Don Beny,"
CARMEN MARIA PONTON CARO,
a/k/a "La Negra,"
JOSÉ TITO LIBIO ULLOA MELO,
LUIS ALFREDO DAZA MORALES,
a/k/a "Fernando,"
JORGE DE LOS REYES BAUTISTA MARTINEZ,
NICOLAS RICARDO TAPASCO ROMERO, and
EDIZON RAMIREZ GAMBOA,

Defendants.
_____/

INDICTMENT

The Grand Jury charges that:

INTRODUCTION

At times relevant to this Indictment:

1. The Republic of Colombia is a constitutional, multi-party democracy. The Revolutionary Armed Forces of Colombia (abbreviated hereafter as "FARC") – an English translation of the Spanish name of the group, "Fuerzas Armadas Revolucionarias de Colombia" – is an armed and violent organization in the Republic of Colombia.

2. The FARC is engaged in armed conflict against the Government of Colombia, and seeks to destabilize municipal Colombian governments by killing urban officials and threatening to execute others. The FARC is responsible for a large number of civilian deaths each year. The FARC's random bombings throughout the country have caused hundreds of civilian deaths and injuries.

3. Since the FARC's inception in 1966, the FARC has engaged in terrorist activity including murder, hostage taking, and violent destruction of property.

4. The FARC is a foreign terrorist organization and has been so designated pursuant to Title 8, United States Code, Section 1189, by the Secretary of State of the United States, initially in October 1997, and most recently on October 2, 2003. As a result of this designation, the provision of material support or resources to the FARC constitutes a violation of Title 18, United States Code, Section 2339B.

5. Representatives and members of a designated foreign terrorist organization are inadmissible to the United States pursuant to Title 8, United States Code, Section 1182(a)(3)(B)(i)(IV)-(V).

6. Laws and regulations of the United States require Colombian citizens to obtain a valid U.S. visa before coming to the United States to visit, work, or reside.

7. The U.S. Visa Waiver Program enables nationals of certain countries to travel to the United States for tourism or business for stays of 90 days or less without obtaining a U.S. visa, pursuant to Title 8, United States Code, Section 1187(a).

8. Spain is a member of the U.S. Visa Waiver Program under Title 8, Code of Federal Regulations, Section 217 et seq. As such, holders of Spanish passports need not obtain a valid U.S. visa to enter the United States.

9. A "cedula" is a Spanish term for a national identity card. The Republic of Colombia and Spain issue cedulas to their populations as proof of identification.

10. Defendant **VICTOR DANIEL SALAMANCA** is a resident and citizen of Colombia.

11. Defendant **JULIO CESAR LOPEZ** is a citizen of Venezuela.

12. Defendant **JALAL SAADAT MOHEISEN** is a resident of Colombia and native of Palestine.

13. Defendant **BERNARDO VALDES LONDOÑO** is a resident and citizen of Colombia.

14. Defendant **CARMEN MARIA PONTON CARO** is a resident and citizen of Colombia.

15. Defendant **JOSÉ TITO LIBIO ULLOA MELO** is a resident and citizen of Colombia.

16. Defendant **LUIS ALFREDO DAZA MORALES** is a resident and citizen of Colombia.

17. Defendant **JORGE DE LOS REYES BAUTISTA MARTINEZ** is a resident and citizen of Colombia.

18. Defendant **NICOLAS RICARDO TAPASCO ROMERO** is a resident and citizen of Colombia.

19. Defendant **EDIZON RAMIREZ GAMBOA** is a resident and citizen of Colombia.

JURISDICTION AND VENUE

20. All events alleged in this Indictment took place within the Republic of Colombia, the Republic of Panama, and the Southern District of Florida, and pursuant to Title 18, United States Code, Section 3237(a), within the venue of the United States District Court for the Southern District of Florida.

COUNT 1

CONSPIRACY TO PROVIDE MATERIAL SUPPORT TO A DESIGNATED FOREIGN TERRORIST ORGANIZATION (REVOLUTIONARY ARMED FORCES OF COLOMBIA)

21. The General Allegations set forth above in paragraphs numbered 1 through 19 of this Indictment are realleged and expressly incorporated herein as if set out in full.

22. Beginning on or about May 25, 2005, and continuing until on or about the date of this Indictment, in Miami-Dade County, in the Southern District of Florida and elsewhere, the defendants,

VICTOR DANIEL SALAMANCA,
a/k/a "El Viejito,"
a/k/a "Don Daniel,"
a/k/a "José Gustavo Ruiz Quijano,"
JULIO CESAR LOPEZ,
JALAL SAADAT MOHEISEN,
a/k/a "Jacki,"
BERNARDO VALDES LONDOÑO,
a/k/a "Don Beny,"
CARMEN MARIA PONTON CARO,

a/k/a "La Negra,"
JOSÉ TITO LIBIO ULLOA MELO, and
LUIS ALFREDO DAZA MORALES,
a/k/a "Fernando,"

did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree with each other and other individuals known and unknown to the Grand Jury to knowingly provide material support and resources, namely, financial services, false documentation and identification, weapons, personnel, and transportation, to a designated foreign terrorist organization, namely, the Revolutionary Armed Forces of Colombia, in violation of Title 18, United States Code, Section 2339B(a)(1).

PURPOSE OF THE CONSPIRACY

23. It was the purpose and object of the conspiracy for the defendants and their co-conspirators to assist persons they believed to be members of the Revolutionary Armed Forces of Colombia to travel to, and to enter, the United States, and to aid them in laundering money, buying and selling drugs, and acquiring weapons.

MANNER AND MEANS

The manner and means by which the defendants, and their unindicted co-conspirators, both known and unknown to the Grand Jury, sought to accomplish the object of the conspiracy included, among other things, the following:

24. Procured and provided fraudulent Spanish passports and other Spanish identification documents to provide new identities for persons they believed to be FARC members.

25. Purchased commercial airline tickets for persons they believed to be FARC members to hide the true identity and travel itinerary of those persons.

26. Arranged undetected passage through the Bogotá, Colombia and Panama City, Panama International Airports for persons they believed to be FARC members.

27. Introduced and offered to introduce contacts, including bulk drug purchasers, money launderers, and arms dealers, to persons they believed to be FARC members.

OVERT ACTS

28. In furtherance of the conspiracy and to effect its purpose, one or more of the conspirators committed and caused to be committed at least one of the following overt acts, among others, in the Republic of Colombia, the Republic of Panama, Miami-Dade County, in the Southern District of Florida, and elsewhere:

Material Support Provided to "Carlos"

29. On or about May 25, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** met with an individual known to the Grand Jury as "Humberto," who told **VICTOR DANIEL SALAMANCA** that he was a negotiating agent for an individual known to the Grand Jury as "Carlos."

30. On or about May 25, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** met with "Humberto," who advised **VICTOR DANIEL SALAMANCA** that "Carlos" was a FARC member in need of traveling to the United States.

31. On or about July 3, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** accepted $10,000,000 Colombian pesos (approximately $4,345 USD) as a down payment to acquire travel documents for "Carlos."

32. On or about July 13, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** met with "Carlos," who informed him that he ("Carlos") was a member of the FARC.

33. On or about July 22, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** gave "Humberto" a Colombian passport for "Carlos" in the false name of "Henry Humberto Lopez Cotrino."

34. On or about July 24, 2005, in Pereira, Colombia, **VICTOR DANIEL SALAMANCA** and **BERNARDO VALDES LONDOÑO** met with "Humberto," who advised them that "Carlos" was a FARC leader.

35. On or about August 10, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** introduced "Humberto" and "Carlos" to **JOSÉ TITO LIBIO ULLOA MELO,** who offered to provide "Carlos" undetected passage through the Bogotá International Airport.

36. On or about August 29, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** gave "Humberto" a fraudulent Spanish passport (no. 01472012-N), a forged Spanish cedula (no. 01472012-N), a forged Spanish driver's license (no. 01472012-N), and a forged Spanish trade card, all of which displayed the picture of "Carlos," but were in the false name of "Hermenegildo Sanchez Cabrera."

37. On or about September 14, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** offered to introduce "Carlos" to drug trafficking and money laundering contacts in the United States and Europe.

38. On or about September 16, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** gave "Humberto" a commercial airline ticket on Avianca

flight 58, from Bogotá, Colombia to Panama City, Panama, in the name of "Henry Lopez."

39. On or about September 21, 2005, in Panama City, Panama, **BERNARDO VALDES LONDOÑO** offered to introduce "Carlos" to money launderers upon his arrival in Miami, Florida.

40. On or about September 21, 2005, in Panama City, Panama, **BERNARDO VALDES LONDOÑO** introduced "Carlos" to an unindicted co-conspirator known to the Grand Jury as "MAL," who discussed "Carlos's" planned passage through security screening points at the Panama City International Airport.

41. On or about September 21, 2005, in Panama City, Panama, **BERNARDO VALDES LONDOÑO** met with "Carlos" and an unindicted co-conspirator known to the Grand Jury as "MAL," who offered to sell weapons to "Carlos," smuggle suitcases of drugs on commercial airlines, and introduce him to Panamanian bulk drug purchasers.

42. On or about September 21, 2005, in Panama City, Panama, **BERNARDO VALDES LONDOÑO** accepted $2,500 USD to facilitate "Carlos's" airport passage through the Panama City International Airport.

43. On or about September 21, 2005, in Panama City, Panama, **BERNARDO VALDES LONDOÑO** gave "Carlos" the Spanish passport, earlier provided by **VICTOR DANIEL SALAMANCA**, in the false name of "Hermenegildo Sanchez Cabrera" with a fraudulently obtained Panamanian immigration entry stamp in the passport.

44. On or about September 21, 2005, in Panama City, Panama, **BERNARDO VALDES LONDOÑO** gave "Carlos" an airplane ticket in the false name of

"Hermenegildo Sanchez," from Panama City, Panama, to Miami, Florida, on Copa Airlines flight 300, departing Panama City, Panama, on September 23, 2005.

45. On or about September 23, 2005, in Miami-Dade County, in the Southern District of Florida, **VICTOR DANIEL SALAMANCA** and **BERNARDO VALDES LONDOÑO** caused "Carlos" to arrive in the United States at the Miami International Airport on Copa Airlines flight 300 from Panama City, Panama.

46. On or about September 30, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** met with "Humberto" and offered to introduce "Carlos" to a contact in New York who is knowledgeable in paramilitary activities.

47. On or about October 22, 2005, in Miami-Dade County, in the Southern District of Florida, and elsewhere, **VICTOR DANIEL SALAMANCA** offered to sell weapons to "Carlos."

Material Support Provided to "Henri," "John Jairo," "Luis Carlos," and "José Manuel"

48. On or about July 15, 2005, in Bogotá, Colombia, **JALAL SAADAT MOHEISEN** met with an individual known to the Grand Jury as "Henri," who was introduced to **JALAL SAADAT MOHEISEN** as a FARC member and negotiator for three other FARC associates.

49. On or about July 15, 2005, in Bogotá, Colombia, **JALAL SAADAT MOHEISEN** offered to provide "Henri's" associates with Spanish passports for $2,500,000 Colombian pesos (approximately $1,085 USD) each.

50. On or about July 19, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** and **JALAL SAADAT MOHEISEN** met with "Henri," who told them

that he ("Henri") and his associates desiring to travel to the United States were FARC members.

51. On or about July 19, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** met with **JALAL SAADAT MOHEISEN** and told him that he was currently getting documents for a FARC leader.

52. On or about July 19, 2005, in Bogotá, Colombia, **JALAL SAADAT MOHEISEN** accepted $4,000,000 Colombian pesos (approximately $1,735 USD) as a down payment for purchase of documents.

53. On or about July 19, 2005, in Bogotá, Colombia, **JALAL SAADAT MOHEISEN** gave **VICTOR DANIEL SALAMANCA** $4,000,000 Colombian pesos (approximately $1,735 USD).

54. On or about July 26, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** gave **JALAL SAADAT MOHEISEN** three sets of fraudulent Spanish identity documents, including Spanish passports, Spanish identity cards, and Spanish driver's licenses, in the false names of "John Jairo Beltran Vilegas," "José Manuel Pacheco Estrada," and "Luis Carlos Garcia Herrera."

55. On or about July 26, 2005, in Bogotá, Colombia, **JALAL SAADAT MOHEISEN** gave "Henri" three sets of fraudulent Spanish identity documents, including Spanish passports, Spanish identity cards, and Spanish driver's licenses, in the false names of "John Jairo Beltran Vilegas," "José Manuel Pacheco Estrada," and "Luis Carlos Garcia Herrera."

56. On or about September 1, 2005, in Bogotá, Colombia, **JOSÉ TITO LIBIO ULLOA MELO** met with "Henri," who informed **JOSÉ TITO LIBIO ULLOA MELO** that he ("Henri") and his associates were FARC members.

57. On or about September 1, 2005, in Bogotá, Colombia, **JOSÉ TITO LIBIO ULLOA MELO** guaranteed that his airport contacts could provide "Henri's" associates with passage through the Bogotá International Airport.

58. On or about September 28, 2005, in Bogotá, Colombia, **JALAL SAADAT MOHEISEN** met with "John Jairo," who told **JALAL SAADAT MOHEISEN** that he ("John Jairo"), "Luis Carlos," and "José Manuel" were traveling to the United States to bring four to five million U.S. dollars from the United States to Colombia.

59. On or about September 29, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA**, **JALAL SAADAT MOHEISEN**, **CARMEN MARIA PONTON CARO**, **JOSÉ TITO LIBIO ULLOA MELO**, and **LUIS ALFREDO DAZA MORALES** met with "John Jairo," who told them that he and his associates were traveling to the United States in order to bring FARC money back to Colombia.

60. On or about September 29, 2005, in Bogotá, Colombia, **LUIS ALFREDO DAZA MORALES** met with "Henri" to explain that he would arrange to check whether the names in "Henri's" associates' Spanish passports were indexed by INTERPOL.

61. On or about September 29, 2005, in Bogotá, Colombia, **CARMEN MARIA PONTON CARO** offered to introduce "Henri" and "John Jairo" to an emeralds dealer in Bogotá to facilitate movement of FARC money from the United States to Colombia.

62. On or about October 22, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** offered to sell "Henri" seven hundred AK-74 rifles and fifty 50-caliber guns.

63. On or about October 27, 2005, in Bogotá, Colombia, **JALAL SAADAT MOHEISEN** gave "Henri" commercial airline e-ticket receipts for reservations from Bogotá, Colombia, to Miami, Florida, for "John Jairo," "Luis Carlos" and "José Manuel" in the false names of "John Beltran," "Luis Carlos Garcia," and "José Manuel Pacheco."

64. On or about November 7, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** offered to broker the sale of two helicopters to "Henri."

65. On or about November 10, 2005, in Bogotá, Colombia, **VICTOR DANIEL SALAMANCA** met with "Henri" and "John Jairo" and explained that his contact **JULIO CESAR LOPEZ** could facilitate movement of money from the United States to Colombia.

66. On or about November 15, 2005, in Bogotá, Colombia, **JULIO CESAR LOPEZ** met with "John Jairo," who told **JULIO CESAR LOPEZ** that he ("John Jairo") moves currency from the United States to Colombia for purchase of FARC armaments.

67. On or about November 15, 2005, in Bogotá, Colombia, **JULIO CESAR LOPEZ** offered to act as "Henri" and "John Jairo's" financial advisor.

68. On or about November 17, 2005, in Bogotá, Colombia, **JALAL SAADAT MOHEISEN** and **CARMEN MARIA PONTON CARO** offered to facilitate undetected passage for "Henri's" associates at the Bogotá International Airport for $4500 USD per person.

69. On or about November 18, 2005, in Bogotá, Colombia, **JALAL SAADAT MOHEISEN** and **CARMEN MARIA PONTON CARO** introduced "Henri" and "John Jairo" to **JORGE DE LOS REYES BAUTISTA MARTINEZ** and **NICOLAS RICARDO TAPASCO ROMERO**.

70. On or about November 21, 2005, in Bogotá, Colombia, **JALAL SAADAT MOHEISEN, CARMEN MARIA PONTON CARO, JORGE DE LOS REYES BAUTISTA MARTINEZ,** and **NICOLAS RICARDO TAPASCO ROMERO** met with "John Jairo."

71. On or about November 21, 2005, in Bogotá, Colombia, **EDIZON RAMIREZ GAMBOA** ushered "John Jairo" around immigration inspection controls at the Bogotá International Airport.

72. On or about November 21, 2005, in Miami-Dade County, in the Southern District of Florida, **VICTOR DANIEL SALAMANCA, JALAL SAADAT MOHEISEN, CARMEN MARIA PONTON CARO, JORGE DE LOS REYES BAUTISTA MARTINEZ, NICOLAS RICARDO TAPASCO ROMERO,** and **EDIZON RAMIREZ GAMBOA** caused "John Jairo" to arrive at the Miami International Airport on Copa flight 488 from Panama City, Panama.

73. On or about November 24, 2005, in Bogotá, Colombia, **EDIZON RAMIREZ GAMBOA** ushered "Luis Carlos" around immigration inspection controls at the Bogotá International Airport.

74. On or about November 24, 2005, in Miami-Dade County, in the Southern District of Florida, **VICTOR DANIEL SALAMANCA, JALAL SAADAT MOHEISEN, CARMEN MARIA PONTON CARO, JORGE DE LOS REYES**

BAUTISTA MARTINEZ, NICOLAS RICARDO TAPASCO ROMERO, and **EDIZON RAMIREZ GAMBOA** caused "Luis Carlos" to arrive at the Miami International Airport on Copa flight 488 from Panama City, Panama.

75. On or about November 27, 2005, in Bogotá, Colombia, **EDIZON RAMIREZ GAMBOA** ushered "José Manuel" around immigration inspection controls at the Bogotá International Airport.

76. On or about November 27, 2005, in Miami-Dade County, in the Southern District of Florida, **VICTOR DANIEL SALAMANCA, JALAL SAADAT MOHEISEN, CARMEN MARIA PONTON CARO, JORGE DE LOS REYES BAUTISTA MARTINEZ, NICOLAS RICARDO TAPASCO ROMERO**, and **EDIZON RAMIREZ GAMBOA** caused "José Manuel" to arrive at the Miami International Airport on Copa flight 488 from Panama City, Panama.

77. On or about November 29, 2005, in Miami-Dade County, in the Southern District of Florida, and elsewhere, **JULIO CESAR LOPEZ** directed "John Jairo" to deliver money to an unindicted co-conspirator known to the Grand Jury as "E."

78. On or about November 29, 2005, in Miami-Dade County, in the Southern District of Florida, an unindicted co-conspirator known to the Grand Jury as "E," accepted $30,000 from "John Jairo" at the direction of **JULIO CESAR LOPEZ**.

79. On or about November 29, 2005, in Bogotá, Colombia, **JULIO CESAR LOPEZ** gave "Henri" $54,000,000 Colombian pesos (approximately $23,475 USD), explaining that he and **VICTOR DANIEL SALAMANCA** had taken their commission for the service.

All in violation of Title 18, United States Code, Section 2339B.

COUNT 2

MATERIAL SUPPORT TO A DESIGNATED FOREIGN TERRORIST ORGANIZATION (REVOLUTIONARY ARMED FORCES OF COLOMBIA)

80. The Grand Jury realleges and incorporates by reference herein paragraphs numbered 1 through 19 of the General Allegations and paragraphs 29 through 47 of Count One of this Indictment.

81. Beginning on or about May 25, 2005, and continuing until on or about the date of this Indictment, in Miami-Dade County, in the Southern District of Florida and elsewhere, the defendants,

VICTOR DANIEL SALAMANCA,
a/k/a "El Viejito,"
a/k/a "Don Daniel,"
a/k/a "José Gustavo Ruiz Quijano,"
and
BERNARDO VALDES LONDOÑO,
a/k/a "Don Beny,"

each aiding and abetting the other and others known and unknown to the Grand Jury, did knowingly attempt to provide material support and resources, namely, financial services, false documentation and identification, weapons, personnel, and transportation, to a designated foreign terrorist organization, namely, the Revolutionary Armed Forces of Colombia, in that they took affirmative acts to accomplish the illegal entry into the United States of a traveler, "Carlos," who they believed to be a FARC leader, and offered to assist in laundering money and purchasing drugs and weapons,

All in violation of Title 18, United States Code, Section 2339B(a)(1), and Title 18, United States Code, Section 2(a).

COUNTS 3-5

MATERIAL SUPPORT TO A DESIGNATED FOREIGN TERRORIST ORGANIZATION (REVOLUTIONARY ARMED FORCES OF COLOMBIA)

82. The Grand Jury realleges and incorporates by reference herein paragraphs numbered 1 through 19 of the General Allegations and paragraphs 48 through 79 of Count One of this Indictment.

83. Beginning on or about May 25, 2005, and continuing until on or about the date of this Indictment, in Bogotá, Colombia, Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

VICTOR DANIEL SALAMANCA,
a/k/a "El Viejito,"
a/k/a "Don Daniel,"
a/k/a "José Gustavo Ruiz Quijano,"
JALAL SAADAT MOHEISEN,
a/k/a "Jacki,"
CARMEN MARIA PONTON CARO,
a/k/a "La Negra,"
JOSÉ TITO LIBIO ULLOA MELO,
and
LUIS ALFREDO DAZA MORALES,
a/k/a "Fernando,"

each aiding and abetting the other and others known and unknown to the Grand Jury, did knowingly attempt to provide material support and resources, namely, financial services, false documentation and identification, weapons, personnel, and transportation, to a designated foreign terrorist organization, namely, the Revolutionary Armed Forces of Colombia, in that they took affirmative acts to accomplish the illegal entry into the United States of travelers, as set forth below, who they believed to be FARC members, at the behest of a person they believed to represent the FARC, and offered to assist in laundering money and purchasing drugs and weapons,

COUNT	ALIEN
3	"JOHN JAIRO"
4	"LUIS CARLOS"
5	"JOSÉ MANUEL"

All in violation of Title 18, United States Code, Section 2339B(a)(1), and Title 18, United States Code, Section 2(a).

COUNT 6

MATERIAL SUPPORT TO A DESIGNATED FOREIGN TERRORIST ORGANIZATION (REVOLUTIONARY ARMED FORCES OF COLOMBIA)

84. The Grand Jury realleges and incorporates by reference herein paragraphs numbered 1 through 19 of the General Allegations and paragraphs 65-67 and 77-79 of Count One of this Indictment.

85. Beginning on or about November 10, 2005, and continuing until on or about the date of this Indictment, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

VICTOR DANIEL SALAMANCA,
a/k/a "El Viejito,"
a/k/a "Don Daniel,"
a/k/a "José Gustavo Ruiz Quijano,"
and
JULIO CESAR LOPEZ,

each aiding and abetting the other and others known and unknown to the Grand Jury, did knowingly attempt to provide material support and resources, namely, financial services, to a designated foreign terrorist organization, namely, the Revolutionary Armed Forces of

Colombia, in that they took affirmative acts to launder what they believed to be FARC funds,

All in violation of Title 18, United States Code, Section 2339B(a)(1), and Title 18, United States Code, Section 2(a).

COUNT 7

CONSPIRACY TO COMMIT ALIEN SMUGGLING

86. The Grand Jury realleges and incorporates by reference herein paragraphs numbered 1 through 19 of the General Allegations and paragraphs 29-79 of Count 1 of this Indictment.

87. Beginning on or about May 25, 2005, and continuing until on or about the date of this Indictment, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

VICTOR DANIEL SALAMANCA,
a/k/a "El Viejito,"
a/k/a "Don Daniel,"
a/k/a "José Gustavo Ruiz Quijano,"
JALAL SAADAT MOHEISEN,
a/k/a "Jacki,"
BERNARDO VALDES LONDOÑO,
a/k/a "Don Beny,"
CARMEN MARIA PONTON CARO,
a/k/a "La Negra,"
JORGE DE LOS REYES BAUTISTA MARTINEZ,
NICOLAS RICARDO TAPASCA ROMERO,
EDIZON RAMIREZ GAMBOA,
JOSÉ TITO LIBIO ULLOA MELO,
and
LUIS ALFREDO DAZA MORALES,
a/k/a "Fernando,"

did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree with each other and other individuals known and unknown to the Grand Jury to commit offenses against the United States, namely:

a. to bring and attempt to bring aliens to the United States, for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that such aliens had not received prior official authorization to come to, enter, and reside in the United States, regardless of any official action which may later be taken with respect to such aliens, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii); and

b. to knowingly encourage and induce aliens to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence was and would be in violation of law, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv) and 1324(a)(1)(B)(i),

All in violation of Title 18, United States Code, Section 371.

COUNT 8

ALIEN SMUGGLING – BRINGING ALIENS TO THE UNITED STATES FOR PROFIT

88. The Grand Jury realleges and incorporates by reference herein paragraphs numbered 1 through 19 of the General Allegations and paragraphs 29 through 47 of Count One of this Indictment.

89. On or about September 23, 2005, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

VICTOR DANIEL SALAMANCA,
a/k/a "El Viejito,"
a/k/a "Don Daniel,"
a/k/a "José Gustavo Ruiz Quijano,"
and
BERNARDO VALDES LONDOÑO,
a/k/a "Don Beny,"

each aiding and abetting the other and others known and unknown to the Grand Jury, knowingly attempted to bring and brought an alien, known to the Grand Jury as "Carlos," to the United States, for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that such alien had not received prior official authorization to come to, enter, and reside in the United States, regardless of any official action which may later be taken with respect to such alien,

All in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2(a).

COUNT 9

ALIEN SMUGGLING – ENCOURAGING AND INDUCING ALIENS TO COME TO THE UNITED STATES

90. The Grand Jury realleges and incorporates by reference herein paragraphs numbered 1 through 19 of the General Allegations and paragraphs 29 through 47 of Count One of this Indictment.

91. On or about September 23, 2005, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

VICTOR DANIEL SALAMANCA,
a/k/a "El Viejito,"
a/k/a "Don Daniel,"

a/k/a "José Gustavo Ruiz Quijano,"
and
BERNARDO VALDES LONDOÑO,
a/k/a "Don Beny,"

each aiding and abetting the other and others known and unknown to the Grand Jury, knowingly encouraged and induced an alien, known to the Grand Jury as "Carlos," to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence was and would be in violation of law, for the purpose of commercial advantage and private financial gain,

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv), and Title 18, United States Code, Section 2(a).

COUNTS 10-12

ALIEN SMUGGLING – BRINGING ALIENS TO THE UNITED STATES FOR PROFIT

92. The Grand Jury realleges and incorporates by reference herein paragraphs numbered 1 through 19 of the General Allegations and paragraphs 48 through 79 of Count One of this Indictment.

93. On or about the dates listed below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

VICTOR DANIEL SALAMANCA,
a/k/a "El Viejito,"
a/k/a "Don Daniel,"
a/k/a "José Gustavo Ruiz Quijano,"
JALAL SAADAT MOHEISEN,
a/k/a "Jacki,"
CARMEN MARIA PONTON CARO,
a/k/a "La Negra,"
JORGE DE LOS REYES BAUTISTA MARTINEZ,
NICOLAS RICARDO TAPASCA ROMERO,
EDIZON RAMIREZ GAMBOA,
JOSÉ TITO LIBIO ULLOA MELO,

and
LUIS ALFREDO DAZA MORALES,
a/k/a "Fernando,"

each aiding and abetting the other and others known and unknown to the Grand Jury, knowingly attempted to bring and brought aliens to the United States, as set forth below in Counts 9-11, for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that such aliens had not received prior official authorization to come to, enter, and reside in the United States, regardless of any official action which may later be taken with respect to such aliens:

COUNT	ALIEN	DATE
10	**"John Jairo"**	**November 21, 2005**
11	**"Luis Carlos"**	**November 24, 2005**
12	**"José Manuel"**	**November 27, 2005**

All in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2(a).

COUNTS 13-15

ALIEN SMUGGLING – ENCOURAGING AND INDUCING ALIENS TO COME TO THE UNITED STATES

94. The Grand Jury realleges and incorporates by reference herein paragraphs numbered 1 through 19 of the General Allegations and paragraphs 48 through 79 of Count One of this Indictment.

95. On or about the dates listed below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

VICTOR DANIEL SALAMANCA,
a/k/a "El Viejito,"
a/k/a "Don Daniel,"

a/k/a "José Gustavo Ruiz Quijano,"
JALAL SAADAT MOHEISEN,
a/k/a "Jacki,"
CARMEN MARIA PONTON CARO,
a/k/a "La Negra,"
JORGE DE LOS REYES BAUTISTA MARTINEZ,
NICOLAS RICARDO TAPASCA ROMERO,
EDIZON RAMIREZ GAMBOA,
JOSÉ TITO LIBIO ULLOA MELO,
and
LUIS ALFREDO DAZA MORALES,
a/k/a "Fernando,"

each aiding and abetting the other and others known and unknown to the Grand Jury, knowingly encouraged and induced aliens, as set forth below in Counts 13-15, to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence was and would be in violation of law, for the purpose of commercial advantage and private financial gain:

COUNT	ALIEN	DATE
13	**"John Jairo"**	**November 21, 2005**
14	**"Luis Carlos"**	**November 24, 2005**
15	**"José Manuel"**	**November 27, 2005**

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv), and Title 18, United States Code, Section 2(a).

COUNT 16

CONSPIRACY TO COMMIT MONEY LAUNDERING

96. The Grand Jury realleges and incorporates by reference herein paragraphs numbered 1 through 19 of the General Allegations and paragraphs 65 through 67 and 77 through 79 of Count One of this Indictment.

97. Beginning on or about November 10, 2005, and continuing until on or about the date of this Indictment, in Bogotá, Colombia, and Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

VICTOR DANIEL SALAMANCA,
a/k/a "El Viejito,"
a/k/a "Don Daniel,"
a/k/a "José Gustavo Ruiz Quijano,"
and
JULIO CESAR LOPEZ,

did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree with each other and other individuals known and unknown to the Grand Jury, to conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, with the intent to promote the carrying on of specified unlawful activity, involving property represented by "John Jairo," at the direction of a Federal official, to be property used to conduct and facilitate specified unlawful activity, namely, the providing of material support to a foreign terrorist organization, through the purchase of tangible property and weapons for the FARC, in violation of Title 18, United States Code, Section 1956(a)(3)(A) and 2,

All in violation of Title 18, United States Code, Section 1956(h) and Title 18, United States Code, Section 1956(a)(3)(A).

COUNT 17

MONEY LAUNDERING

98. The Grand Jury realleges and incorporates by reference herein paragraphs numbered 1 through 4 of the General Allegations and paragraphs 65 through 67 and 77 through 79 of Count One of this Indictment.

99. On or about November 29, 2005, in Bogotá, Colombia, and Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

VICTOR DANIEL SALAMANCA,
a/k/a "El Viejito,"
a/k/a "Don Daniel,"
a/k/a "José Gustavo Ruiz Quijano,"
and
JULIO CESAR LOPEZ,

each aiding and abetting the other and others known and unknown to the Grand Jury, and with the intent to promote the carrying on of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by "John Jairo," at the direction of a Federal official, to be property used to conduct and facilitate specified unlawful activity, namely, the providing of material support to a foreign terrorist organization, through the purchase of tangible property and weapons for the FARC,

All in violation of Title 18, United States Code, Section 1956(a)(3)(A), and Title 18, United States Code, Section 2(a).

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A TRUE BILL

FOREPERSON

for R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

ALICE S. FISHER
ASSISTANT ATTORNEY GENERAL

BRIAN SKARET
UNITED STATES DEPARTMENT OF JUSTICE

WILLIAM WHITE
ASSISTANT UNITED STATES ATTORNEY