

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**12-20477-CR-ALTONAGA/SIMONTON**  
Case No.

18 U.S.C. § 371  
22 U.S.C. § 2778(b)(2)

UNITED STATES OF AMERICA

vs.

**KIRK DRELLICH,**  
**Defendant.**

**INFORMATION**

The United States Attorney charges that:

**GENERAL ALLEGATIONS**

At all times material to this Information:

**The Defendant**

**KIRK DRELLICH** was the owner and president of SkyHigh Accessories, Inc., located at 4960 SW 52<sup>nd</sup> Street, Davie, Florida. SkyHigh Accessories, Inc. was engaged in the business of buying and selling aircraft parts.

**The Arms Export Control Act**

The Arms Export Control Act and its attendant regulations, the International Traffic in Arms Regulations (Title 22, Code of Federal Regulations, Sections 120-130), require a person to apply for and obtain an export license from the Directorate of Defense Trade Controls of the United States Department of State before exporting a defense article designated on the United States Munitions List from the United States.

COUNT 1  
Conspiracy  
(18 U.S.C. § 371)

1. The “General Allegations” portion of this Information is realleged and incorporated by reference as if fully set forth herein.

2. From at least as early as November 22, 2008 through on or about August 4, 2010, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant, \_\_\_\_\_

**KIRK DRELLICH,**

did knowingly and willfully combine, conspire, confederate, and agree with persons known and unknown to the United States Attorney, to commit an offense against the United States, that is, to export and cause to be exported, from the United States to a place outside thereof, defense articles designated on the United States Munitions List, without first obtaining the required license or written approval from the Directorate of Defense Trade Controls of the United States Department of State, in violation of Title 22, United States Code, Section 2778(b)(2) and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1.

OBJECTIVE OF THE CONSPIRACY

3. It was the objective of the conspiracy that defendant **KIRK DRELLICH** and his co-conspirators enrich themselves by unlawfully exporting defense articles from the United States to the Bolivarian Republic of Venezuela. It was a further part of the objective of the conspiracy that defendant **KIRK DRELLICH** and his co-conspirators perpetuate and conceal the existence of the conspiracy.

MANNER AND MEANS

The manner and means by which defendant **KIRK DRELLICH** and his co-conspirators

sought to accomplish the objective of the conspiracy included, among others, the following:

4. Co-conspirators residing in Venezuela and Spain advised co-conspirator Victor Brown and another co-conspirator who was then residing in the United States, hereinafter identified as "A.R.", of the specific defense articles that the Venezuelan Air Force wanted to purchase.

5. Co-conspirators Victor Brown and A.R. purchased and obtained some of the requested defense articles from defendant **KIRK DRELLICH** of SkyHigh Accessories, Inc., located in Davie, Florida.

6. Co-conspirators Victor Brown and A.R. made arrangements for the shipment of the defense articles to the Bolivarian Republic of Venezuela.

7. Defendant **KIRK DRELLICH** and his co-conspirators, including Victor Brown and A.R., exported and caused defense articles to be exported from the United States without first obtaining the required license or written approval from the Directorate of Defense Trade Controls of the United States Department of State.

8. Co-conspirators residing in foreign countries paid defendant **KIRK DRELLICH** and co-conspirators Victor Brown and A.R. for the defense articles.

#### OVERT ACTS

In furtherance of this conspiracy, and to accomplish its objective, at least one of the co-conspirators committed or caused to be committed, in the Southern District of Florida and elsewhere, at least one of the following overt acts, among others:

9. On or about November 22, 2008, co-conspirator Victor Brown traveled from Miami, Florida to Madrid, Spain to meet with some of his co-conspirators.

10. On or about February 11, 2009, co-conspirator Victor Brown traveled from Miami, Florida to Madrid, Spain to meet with some of his co-conspirators.

11. On or about July 21, 2009, co-conspirator Victor Brown attended a meeting with three other individuals at 5525 NW 15<sup>th</sup> Avenue, Suite 302, Fort Lauderdale, Florida.

12. On or about September 14, 2009, defendant **KIRK DRELLICH** provided an Actuator, Geneva Lock (Part Number 100930-1); a Contractor/High Power Relay (Part Number B123J or 1616523-7); a Valve, Shutoff (Part Number 106388-1-2); and a Valve, Shut-off, Hydraulic, Solenoid Operated (Part Number 9A022-1) to co-conspirators Victor Brown and A.R.

13. On or about September 14, 2009, co-conspirators Victor Brown and A.R. shipped or caused to be shipped the aforementioned Actuator, Geneva Lock (Part Number 100930-1); Contractor/High Power Relay (Part Number B123J or 1616523-7); Valve, Shutoff (Part Number 106388-1-2); and Valve, Shut-off, Hydraulic, Solenoid Operated (Part Number 9A022-1) out of the United States to the Bolivarian Republic of Venezuela.

14. On or about October 13, 2009, defendant **KIRK DRELLICH** provided a Pressure Switch (Part Number H-E 40088) to co-conspirators Victor Brown and A.R.

15. On or about October 13, 2009, co-conspirators Victor Brown and A.R. shipped or caused to be shipped the aforementioned Pressure Switch (Part Number H-E 40088) out of the United States to the Bolivarian Republic of Venezuela.

16. On or about November 10, 2009, defendant **KIRK DRELLICH** provided two Turbines, Cooling (Part Number 571925-3-1) to co-conspirators Victor Brown and A.R.

17. On or about November 10, 2009, co-conspirators Victor Brown and A.R. shipped or caused to be shipped the aforementioned two Turbines, Cooling (Part Number 571925-3-1) out of the United States to the Bolivarian Republic of Venezuela.

18. On or about December 1, 2009, defendant **KIRK DRELLICH** provided an Actuator Rotary Trim Tab Assy. (Part Number A489-5) and a Pump, Centrifugal, Fuel Booster (Part Number

RR54860) to co-conspirators Victor Brown and A.R.

19. On or about December 1, 2009, co-conspirators Victor Brown and A.R. shipped or caused to be shipped the aforementioned Actuator Rotary Trim Tab Assy. (Part Number A489-5) and Pump, Centrifugal, Fuel Booster (Part Number RR54860) out of the United States to the Bolivarian Republic of Venezuela.

~~20. On or about December 3, 2009, defendant **KIRK DRELLICH** provided a Rotating Disk (Part Number 313010) to co-conspirators Victor Brown and A.R.~~

21. On or about December 3, 2009, co-conspirators Victor Brown and A.R. shipped or caused to be shipped the aforementioned Rotating Disk (Part Number 313010) out of the United States to the Bolivarian Republic of Venezuela.

22. On or about May 3, 2010, defendant **KIRK DRELLICH** provided a Pressure Switch (Part Number H-E 40088), a Butterfly Valve and Actuator Assembly 3.00 DIA Stainless Steel (Part Number BYLB-51045) and a Pump Assembly, Fuel Booster (Part Number 60-369A) to co-conspirators Victor Brown and A.R.

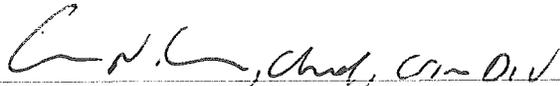
23. On or about May 3, 2010, co-conspirators Victor Brown and A.R. shipped or caused to be shipped the aforementioned Pressure Switch (Part Number H-E 40088), Butterfly Valve and Actuator Assembly 3.00 DIA Stainless Steel (Part Number BYLB-51045) and Pump Assembly, Fuel Booster (Part Number 60-369A) out of the United States to the Bolivarian Republic of Venezuela.

24. On or about July 12, 2010, defendant **KIRK DRELLICH** provided three 25 Liter Liquid Oxygen Converters (Part Number 10C-0001-26) to co-conspirators Victor Brown and A.R.

25. On or about July 12, 2010, co-conspirators Victor Brown and A.R. shipped or caused

to be shipped the aforementioned three 25 Liter Liquid Oxygen Converters (Part Number 10C-0001-26) out of the United States to the Bolivarian Republic of Venezuela.

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

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WIFREDO A. FERRER  
UNITED STATES ATTORNEY

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THOMAS J. MULVIHILL  
SENIOR LITIGATION COUNSEL