

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

SEALED

Grand Jury Sworn in on January 8, 2016

UNITED STATES OF AMERICA

v.

ULISES YOVANY MORA,
also known as
"Ulises Yovany Mora-
Tapia," "Ulises Yovani
Mora," "Ulises Giovanni
Mora," "Yiyo," "YY,"
"Gigo," "GG," "S.R
Macwire," "Sr. Macwire
nvo," "Mr. mcwire nvo,"
"Mr. Robinson," "Sr.
Robinson," and "Sr.
Jefferson,"

CRIMINAL NO. _____

UNDER SEAL

21 U.S.C. §§959(a), 960, and 963
(Conspiracy to Distribute Five Kilograms or
More of Cocaine Knowing and Intending
that it will be Unlawfully Imported into the
United States.)

18 U.S.C. § 2
(Aiding and Abetting)

21 U.S.C. §§ 853 and 970
(Forfeiture)

Case: 1:16-cr-00193
Assigned To : Howell, Beryl A.
Assign. Date : 10/26/2016
Description: INDICTMENT (B)
Case Related to: 14-cr-51 (BAH)

FILED IN OPEN COURT

OCT 26 2016

INDICTMENT

**CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA**

The Grand Jury charges that:

COUNT ONE

From in or around 2010, and continuing to the date of the filing of this Indictment, in the countries of Mexico, the United States and elsewhere, the Defendant, **ULISES YOVANY MORA**, also known as "Ulises Yovany Mora-Tapia," "Ulises Yovani Mora," "Ulises Giovanni Mora," "Yiyo," "YY," "Gigo," "GG," "S.R Macwire," "Sr. Macwire nvo," "Mr. mcwire nvo," "Mr. Robinson," "Sr. Robinson," and "Sr. Jefferson" together with others, both known and unknown to the Grand Jury, did knowingly, intentionally, and willfully conspire to distribute

five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance knowing and intending that such substance 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 him 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 and substance containing a detectable amount of cocaine in violation of Title 21, United States Code, Sections 960(b)(1)(B).

(Conspiracy to Distribute Five Kilograms or More of Cocaine, knowing and intending that it would be imported into the United States in violation of Title 21, United States Code, Sections 959(a), 960 and 963, and 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 a 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.

Said property includes, but is not limited to:

A sum of money equal to all proceeds the Defendant obtained directly or indirectly as a result of the Title 21 offense charged in this indictment, and all property used or intended to be used to facilitate such offense, that is, not less than a sum of money representing the amount of funds

involved in the offense, and all interest and proceeds traceable thereto; in that such sum, in aggregate, was received by the Defendant in exchange for the distribution of controlled substances or is traceable thereto. 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:

Rihem Badwe

Foreperson

[Handwritten signature]

ARTHUR G. WYATT

Chief

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

By:

[Handwritten signature]

ANTHONY J. NARDOZZI

Trial Attorney

Narcotic and Dangerous Drug Section
Criminal Division
U.S. Department of Justice
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U.S. District and Bankruptcy Courts
for the District of Columbia

A TRUE COPY

ANGELA D. CAESAR, Clerk

By *Daniel Rudy* 10/22/16
Deputy Clerk