# IN THE UNITED STATES DISTRICT COURT FO EASTERN DISTRICT OF VIRGINIA

Alexandria Division

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	) ·	CLERK, U.S. DISTRICT COURT ALEXANDRIA, VIRGINIA	

UNITED STATES OF AMERICA **UNDER SEAL** Case No. 1:16-CR-300 ٧. Count 1: Conspiracy to Distribute Five DAMASO LOPEZ NUNEZ, Kilograms or More of Cocaine a/k/a "El Licenciado" and "Lic," Intending and Knowing it will be Unlawfully Imported into the DAMASO LOPEZ SERRANO, United States a/k/a "Mini Lic" and "Damaso Lopez Jr.," (21 U.S.C. §§ 959(a), 963) Defendants. Forfeiture Notice: 21 U.S.C. § 853

## **INDICTMENT**

DECEMBER 2016 TERM - at Alexandria, Virginia

#### **COUNT ONE**

#### THE GRAND JURY CHARGES THAT:

From in and around 2003 and continuing thereafter up to and including the date of this Indictment, the exact dates being unknown to the Grand Jury, within the jurisdiction of the United States and in an offense begun and committed outside the jurisdiction of a particular State or district, including in Mexico, Colombia, Costa Rica, Honduras, Guatemala, Panama, and elsewhere, the defendants DAMASO LOPEZ NUNEZ (also known as "El Licenciado" and "Lic") and DAMASO LOPEZ SERRANO (also known as "Mini Lic" and "Damaso Lopez Jr."), who will be first brought to the Eastern District of Virginia, did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to the Grand Jury to knowingly and intentionally distribute five kilograms or more of a mixture and substance

containing a detectable amount of cocaine, a Schedule II controlled substance, intending and knowing that such substance would be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959(a) and 960.

(All in violation of Title 21, United States Code, Section 963.)

## **FORFEITURE NOTICE**

Pursuant to Fed.R.Crim.P. 32.2(a), the defendants, are hereby notified that if convicted of the violation alleged in this Indictment, they shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a) any property constituting, or derived from, any proceeds each defendant obtained, directly or indirectly, as the result of such violation; and any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation. This property includes \$10,000,000,000 in United States currency representing proceeds the defendants obtained in the course of the conspiracy, as alleged in Count One of this Indictment.

(Pursuant to Title 21, United States Code, Section 853 and Fed.R.Crim.P.32.2).

Dana J. Boente United States Attorney Eastern District of Virginia

By:

Assistant United States Attorney

William M. Sloan

Assistant United States Attorney

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Foregerson

Arthur 27. Narcotic and Dangerous Drug Section

Criminal Division

U.S. Department of Justice

By:

Acting Deputy Chief

Narcotic and Dangerous Drug Section

12/14/16

Michael N. Lang

Trial Attorney

Narcotic and Dangerous Drug Section

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## UNITED STATES DISTRICT COURT

Eastern District of Virginia

Alexandria Division

#### THE UNITED STATES OF AMERICA

VŞ.

DAMASO LOPEZ NUNEZ
a/k/a "El Licenciado" and "Lic"

DAMASO LOPEZ SERRANO
a/k/a "Mini Lic" and "Damaso Lopez Jr."

# **INDICTMENT**

Ct.1: Conspiracy to Distribute Five Kilograms or More of Cocaine Intending and Knowing it will be Unlawfully Imported into the United States

(Violation of Title 21, United States Code, Sections 959(a) and 963) Forfeiture

(Violation of Title 21, United States Code, Section 853)

A true bill.	Lan	
		Foreman
Filed in open court this _	14	_day,
o <u>f December</u> A.D. 20 <u>16</u>		
		Clerk
Bail, \$		
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