

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. **11-20478 CR-COOKE**

21 U.S.C. §963  
21 U.S.C. §959(a)(1)  
21 U.S.C. §959(b)(2)  
21 U.S.C. §853  
18 U.S.C. §1956(h)  
18 U.S.C. §1956(a)(3)(A)  
18 U.S.C. §1952  
18 U.S.C. §1544

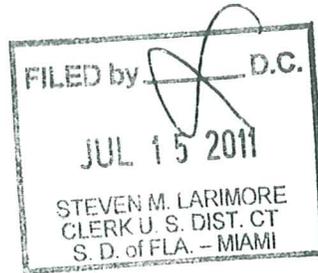
MAGISTRATE JUDGE  
TURNOFF

UNITED STATES OF AMERICA

vs.

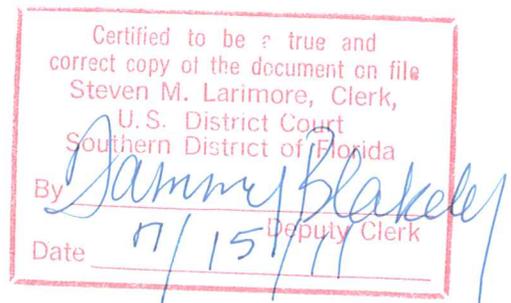
**ROBERTO MENDEZ-HURTADO,  
ALVARO RICARDO NINO-BONILLA,  
a/k/a "Lucas,"  
a/k/a "Mono,"  
ROBERTO HARRIGAN,  
a/k/a "Tico,"  
SAMUEL JAVIER,  
JORGE IVAN RIVEROS,  
LUIS FERNANDO VELASQUEZ-RAMIREZ,  
NARCISO RONDON-MEJIA,  
SEVERO CONFESSOR,  
EARL DELVILLE HODGE  
a/k/a, "Bob Hodge,"  
JUAN FIGUEROA-VALDEZ,  
CARLSTON BEAZER,  
CHAD SKELTON,  
and  
HUMBERTO GALLEGO,**

**Defendants.**



**INDICTMENT**

The Grand Jury charges that:



**COUNT 1**

From in or around March 2009, through the date of the return of this indictment, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**ROBERTO MENDEZ-HURTADO,  
ALVARO RICARDO NINO-BONILLA,  
a/k/a "Lucas,"  
a/k/a "Mono,"  
ROBERTO HARRIGAN,  
a/k/a "Tico,"  
SAMUEL JAVIER,  
JORGE IVAN RIVEROS,  
LUIS FERNANDO VELASQUEZ-RAMIREZ,  
NARCISO RONDON-MEJIA,  
SEVERO CONFESSOR,  
EARL DELVILLE HODGE  
a/k/a, "Bob Hodge,"  
JUAN FIGUEROA-VALDEZ,  
CARLSTON BEAZER,  
CHAD SKELTON,  
and  
HUMBERTO GALLEGO,**

did knowingly and intentionally combine, conspire, confederate and agree with each other and with others unknown to the Grand Jury to:

a. distribute cocaine, a Schedule II controlled substance, intending that such substance will be unlawfully imported into the United States or into waters within a distance of 12 miles of the coast of the United States in violation of Title 21, United States Code, Section 959 (a)(1); and

b. possess with intent to distribute cocaine, a Schedule II controlled substance, while on board an aircraft registered in the United States and with a United States citizen on board in violation of Title 21, United States Code, Section 959(b)(1).

### Ways and Means of the Conspiracy

1. It was part of this conspiracy that the defendants, Roberto Mendez-Hurtado and Alvaro Ricardo Nino-Bonilla, a/k/a "Lucas," a/k/a "Mono," would solicit the services of a United States pilot from the Southern District of Florida to purchase airplanes, radio equipment and airplane equipment to fly to Apure, Venezuela, pick up loads of cocaine and distribute cocaine to waiting boats and off-load crews in waters near the British Virgin Islands and landing strips in Guatemala and Honduras.

2. It was further part of this conspiracy that the defendants Roberto Mendez-Hurtado and Alvaro Ricardo Nino-Bonilla, a/k/a "Lucas," a/k/a "Mono," would cause money to be wired to bank accounts in the United States and would cause money to be hand-delivered to the pilot or his representatives in the United States to pay for airplanes, airplane equipment, radio equipment, and travel to be used to prepare for and fly cocaine from Apure, Venezuela to waters off the British Virgin Islands and landing strips in Guatemala and Honduras.

3. It was further part of the conspiracy that Roberto Mendez-Hurtado would direct Samuel Javier to receive radio equipment to assist in the distribution of cocaine, in Saint Thomas, U.S. Virgin Islands.

4. It was further part of this conspiracy that the defendants Severo Confessor, Narciso Rondon-Mejia, Luis Fernando Velasquez-Ramirez, Humberto Gallego and others unknown to the Grand Jury would distribute money to be used to promote, facilitate and carry on the distribution of cocaine by a United States pilot flying a United States registered aircraft from Apure, Venezuela to the British Virgin Islands, Guatemala and Honduras.

5. It was further part of the conspiracy that the defendants Roberto Mendez-Hurtado, Alvaro Ricardo Nino Bonilla, a/k/a "Lucas," a/k/a "Mono" and Jorge Ivan Riveros would cause the delivery and would deliver a false Venezuelan passport and false Venezuelan identification documents for the United States pilot's use in flying to Venezuela to pick up cocaine for distribution.

6. It was further part of the conspiracy that the defendant, Earl Delville Hodge, a/k/a "Bob Hodge," would direct the defendants, Juan Figueroa-Valdez, Chad Skelton, Carlston Beazer and others unknown to the Grand Jury, to operate on fast boat crews to pick up cocaine dropped from airplanes in the waters off the British Virgin Islands with the intent that the cocaine be distributed in the United States.

7. It was further part of this conspiracy that Roberto Mendez-Hurtado paid Roberto Harrigan, a/k/a "Tico," a British Virgin Islands customs officer, to collect from Earl Delville Hodge, a/k/a "Bob Hodge" proceeds from cocaine sold in Puerto Rico and elsewhere, conceal those cocaine proceeds and deliver those proceeds for airplane transportation to Venezuela.

8. It was further part of this conspiracy that Roberto Mendez-Hurtado paid Roberto Harrigan, a/k/a "Tico," a British Virgin Islands customs officer, to permit employees of Roberto Mendez-Hurtado's cocaine distribution organization to illegally enter and remain in the British Virgin Islands using false Venezuelan passports and to make, collect and record payments for cocaine distributions made by Roberto Mendez-Hurtado's cocaine distribution organization under the protection of a British Virgin Islands customs officer.

9. It was further part of this conspiracy that Alvaro Ricardo Nino-Bonilla, a/k/a "Lucas," a/k/a "Mono," and individuals unknown to the Grand Jury, would meet Pilot A.A. and his United States registered aircraft in Apure, Venezuela; would house Pilot A.A. and his co-pilot; would refuel

the United States registered aircraft; would alter the markings on the aircraft to disguise the aircraft and would load the aircraft with cocaine.

10. It was further part of the conspiracy that individuals unknown to the Grand Jury, would prepare, protect and maintain an airstrip in Apure, Venezuela for the landing, concealment, refueling, loading and take off of aircraft used to transport multi-hundred kilogram loads of cocaine.

11. It was further part of the conspiracy that on or about September 28, 2010, Pilot A.A. would airdrop cocaine in waters off the British Virgin Islands.

12. It was further part of the conspiracy that on or about September 29, 2010, Earl Delville Hodge, a/k/a "Bob Hodge," would pick up from the waters of the British Virgin Islands and would cause cocaine to be concealed on Norman Island, British Virgin Islands, within twelve (12) miles of the United States coastline.

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

## COUNT 2

From in or around March 2009, through the date of the return of this indictment, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida and elsewhere, the defendants,

**ROBERTO MENDEZ-HURTADO,  
ALVARO RICARDO NINO-BONILLA,  
a/k/a "Lucas,"  
a/k/a "Mono,"  
LUIS FERNANDO VELASQUEZ-RAMIREZ,  
NARCISO RONDON-MEJIA,  
SEVERO CONFESSOR,  
and  
HUMBERTO GALLEGGO,**

did knowingly and intentionally combine, conspire, confederate and agree with each other and with

others 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 conduct financial transactions in interstate and foreign commerce, with the intent to promote the carrying on of specified unlawful activity, involving property used to conduct and facilitate specified unlawful activity in violation of Title 18, United States Code, Section 1956(a)(3)(A); and

b. to transport, transmit, and transfer monetary instruments and funds to a place in the United States from or 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 conspiracy to distribute cocaine, a Schedule II controlled substance, intending that such substance will be unlawfully imported into the United States or into waters within a distance of twelve (12) miles of the coast of the United States in violation of Title 21, United States Code, Section 959(a)(1) and 963 and conspiracy to possess with intent to distribute cocaine, a Schedule II controlled substance, on board an aircraft registered in the United States and with a United States citizen on board, in violation of Title 21, United States Code, Section 959(b)(2) and 963.

#### **Ways and Means of the Conspiracy**

It was the part of this conspiracy that the defendants, Roberto Mendez-Hurtado and Alvaro Ricardo Nino-Bonilla, a/k/a "Lucas," a/k/a "Mono," would cause the defendants, Narciso Rondon-Mejia, Severo Confessor, Luis Fernando Velasquez-Ramirez, Humberto Gallego and others unknown to the Grand Jury, to conduct financial transactions in interstate and foreign commerce

which would provide funds to a United States pilot to be used to purchase airplanes, radio equipment, airplane equipment and travel in order to fly from the United States to Apure, Venezuela, pickup and transport cocaine and distribute the cocaine to offload crews located in the waters off the British Virgin Islands, in Guatemala and Honduras.

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

**COUNT 3**

On or about September 28, 2010, in the country of Venezuela, and elsewhere, the defendants,

**ROBERTO MENDEZ-HURTADO**  
**and**  
**ALVARO RICARDO NINO-BONILLA,**  
**a/k/a “Lucas,”**  
**a/k/a “Mono,”**

did knowingly and intentionally cause to be possessed with intent to distribute cocaine, a Schedule II controlled substance, while on board an aircraft registered in the United States and with a United States citizen aboard said aircraft bearing U.S. aircraft registration number N155TT, in violation of Title 21, United States Code, Section 959(b)(2) and Title 18, United States Code, Section 2.

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 4**

On or about September 28, 2010, in the country of Venezuela, and elsewhere, the defendants,

**ROBERTO MENDEZ-HURTADO**  
**and**  
**ALVARO RICARDO NINO-BONILLA,**  
**a/k/a “Lucas,”**  
**a/k/a “Mono,”**

did knowingly and intentionally cause to be distributed cocaine, a Schedule II controlled substance, intending that such substance would be unlawfully imported into the United States or into waters within a distance of 12 miles of the coast of the United States, in violation of Title 21, United States Code, Section 959(a)(1) and Title 18, United States Code, Section 2.

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 5**

On or about April 12, 2010, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**ROBERTO MENDEZ-HURTADO,**

with intent to promote the carrying on of a specified unlawful activity, did conduct a financial transaction in interstate and foreign commerce, involving property used to conduct and facilitate specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(3)(A) and 2.

It is further alleged that the specified unlawful activity is the possession with intent to distribute a controlled substance, that is, cocaine, on board a United States registered aircraft and

with a United States citizen on board, in violation of Title 21, United States Code, Section 959(b)(2).

**COUNT 6**

On or about May 28, 2010, in Miami-Dade County, in the Southern District of Florida and elsewhere, the defendant,

**ROBERTO MENDEZ-HURTADO,**

with intent to promote the carrying on of a specified unlawful activity, did conduct and did cause a financial transaction in interstate and foreign commerce, involving property used to conduct and facilitate specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(3)(A) and 2.

It is further alleged that the specified unlawful activity is the possession with intent to distribute a controlled substance, that is, cocaine, on board a United States registered aircraft and with a United States citizen on board, in violation of Title 21, United States Code, Section 959(b)(2).

**COUNT 7**

On or about May 24, 2010, in Miami-Dade County, in the Southern District of Florida and elsewhere, the defendants,

**ROBERTO MENDEZ-HURTADO**  
**and**  
**ALVARO RICARDO NINO-BONILLA,**  
**a/k/a “Lucas,”**  
**a/k/a “Mono,”**

with intent to promote the carrying on of a specified unlawful activity, did conduct and did cause a financial transaction in interstate and foreign commerce, involving property used to conduct and facilitate specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(3)(A) and 2.

It is further alleged that the specified unlawful activity is the possession with intent to

distribute a controlled substance, that is, cocaine, on board a United States registered aircraft and with a United States citizen on board in violation of Title 21, United States Code, Section 959(b)(2).

**COUNT 8**

On or about September 13, 2010, at Miami-Dade County, in the Southern District of Florida and elsewhere, the defendants,

**ROBERTO MENDEZ-HURTADO,  
ALVARO RICARDO NINO-BONILLA,  
a/k/a "Lucas,"  
a/k/a "Mono,"  
and  
LUIS FERNANDO VELASQUEZ-RAMIREZ,**

with intent to promote the carrying on of a specified unlawful activity, did conduct and did cause a financial transaction in interstate and foreign commerce, involving property used to conduct and facilitate specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(3)(A) and 2.

It is further alleged that the specified unlawful activity is the possession with intent to distribute a controlled substance, that is, cocaine, on board a United States registered aircraft and with a United States citizen on board in violation of Title 21, United States Code, Section 959(b)(2).

**COUNTS 9-18**

On or about the dates set forth below, according to Counts, in the Southern District of Florida and elsewhere, the defendants, as set forth below, and persons known and unknown to the Grand Jury, knowingly and intentionally did travel and cause travel, used and caused to be used facilities in interstate and foreign commerce with intent to promote, manage, establish and carry on, and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is,

a business enterprise involving possession with intent to distribute cocaine, a Schedule II narcotic controlled substance, aboard a United States registered aircraft with a United States citizen aboard and a conspiracy to possess with intent to distribute cocaine, a Schedule II narcotic controlled substance aboard a United States registered aircraft with a United States citizen aboard, and thereafter did perform, attempt to perform and cause to be performed acts to promote, manage, establish and carry on, and facilitate the promotion, management, establishment, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

COUNT	DATE (ON OR ABOUT)	DEFENDANT	TRAVEL OR USE OF FACILITY	THEREAFTER ACT
9	4/12/10	Roberto Mendez-Hurtado	Western Union Wire Transfer of \$3,000 from Dominican Republic to Miami, Florida.	Meetings between the pilot and Roberto Mendez-Hurtado in Antigua.
10	4/14/10	Roberto Mendez-Hurtado	Travel by Pilot A.A. from Miami, Florida to Antigua.	Meeting between the pilot and Roberto Mendez-Hurtado in Antigua.
11	4/23/10	Roberto Mendez-Hurtado and Samuel Javier	Fed. Ex. Shipment of two meter radios from Pompano Beach, Florida to St. Thomas, V.I.	Radios received by Samuel Javier in V.I. for airplane narcotics drops.
12	5/28/10	Roberto Mendez-Hurtado	Wire transfer of funds to Citi Bank in Coconut Creek, Florida from Dominican Republic.	Purchase of aircraft, U.S. Registration #N155TT.
13	6/16/10	Roberto Mendez-Hurtado and Alvaro Ricardo Nino-Bonilla, "Lucas," a/k/a "Mono."	Travel by Pilot AA from Miami, Florida to Aberdeen, South Dakota.	Purchase of aircraft, U.S. registration #N155TT.
14	8/12/10	Roberto Mendez-Hurtado and Alvaro Ricardo Nino-Bonilla, "Lucas," a/k/a "Mono."	Travel by Pilot AA from Miami, Florida to Bogota, Colombia.	Meeting with Alvaro Ricardo Nino-Bonilla, a/k/a "Lucas," a/k/a "Mono."

COUNT	DATE (ON OR ABOUT)	DEFENDANT	TRAVEL OR USE OF FACILITY	THEREAFTER ACT
15	9/28/10	Roberto Mendez-Hurtado and Alvaro Ricardo Nino-Bonilla, "Lucas," a/k/a "Mono."	Travel by Pilot A.A. from Miami, Florida to Apure, Venezuela.	Receive cocaine in Apure, Venezuela.
16	9/19/10	Roberto Mendez-Hurtado, Alvaro Ricardo Nino-Bonilla, "Lucas," a/k/a "Mono" and Jorge Ivan Riveros.	Travel from Bogota, Colombia to Miami, Florida.	Delivery of false Venezuelan passport and identification papers to the pilot.
17	1/20/11	Roberto Mendez-Hurtado and Alvaro Ricardo Nino-Bonilla, "Lucas," a/k/a "Mono."	Travel by Pilot A.A. from Miami, Florida to Retalhuleu, Guatemala.	Examination of landing strips in Guatemala.
18	3/29/11	Alvaro Ricardo Nino-Bonilla, "Lucas," a/k/a "Mono."	Travel by Pilot A.A. from Miami, Florida to San Pedro Sula, Honduras.	Examination of landing strips in Honduras.

**COUNT 19**

On or about September 20, 2010, in Miami-Dade County, in the Southern District of Florida, the defendants,

**ROBERTO MENDEZ-HURTADO,  
ALVARO RICARDO NINO-BONILLA,  
a/k/a "Lucas,"  
a/k/a "Mono,"  
and  
JORGE IVAN RIVEROS,**

did willfully and knowingly furnish and deliver and did cause to be furnished and delivered a Venezuelan passport in the name of V.A.F.B., bearing a date of birth of January 21, 1959, to Pilot A.A., knowing that Pilot A.A. was not the person for whose use said passport was originally issued and designed, in violation of Title 18, United States Code, Sections 1544 and 2.

It is further alleged that said passport was furnished and delivered to facilitate the drug trafficking crimes of conspiracy to possess with intent to distribute cocaine, a Schedule II narcotic controlled substance aboard a United States registered aircraft with a United States citizen aboard and possession with intent to distribute cocaine aboard a United States registered aircraft with a United States citizen on board in violation of Title 21, United States Code, Sections 959(b)(2) and 963.

### FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are re-alleged and by this reference fully incorporated herein for purposes of alleging forfeiture to the United States of America of certain property in which the defendants,

**ROBERTO MENDEZ-HURTADO,  
ALVARO RICARDO NINO-BONILLA,  
a/k/a "Lucas,"  
a/k/a "Mono,"  
ROBERTO HARRIGAN,  
a/k/a "Tico,"  
SAMUEL JAVIER,  
JORGE IVAN RIVEROS,  
LUIS FERNANDO VELASQUEZ-RAMIREZ,  
NARCISO RONDON-MEJIA,  
SEVERO CONFESSOR,  
EARL DELVILLE HODGE  
a/k/a, "Bob Hodge,"  
JUAN FIGUEROA-VALDEZ,  
CARLSTON BEAZER,  
CHAD SKELTON,  
and  
HUMBERTO GALLEGO,**

have an interest.

2. Upon conviction of a violation of Title 21, United States Code, Section 963 or 959, as alleged in this Indictment, the defendant so convicted shall forfeit all of their respective right, title and interest to the United States in any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation and in any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation, pursuant to Title 21, United States, Section 853(a)(1)(2).

3. Upon conviction of a violation, or a conspiracy to violate, Title 18, United States Code, Section 1956, as alleged in this Indictment, the defendant so convicted shall forfeit all of their respective right, title and interest to the United States in any property, real or personal, involved in such violation, and in any property traceable to such property, pursuant to Title 18, United States Code, 982(a)(1).

4. Upon conviction of a violation of Title 18, United States Code, Section 1544, as alleged in this Indictment, the defendant so convicted shall forfeit all of their respective right, title and interest to the United States in the following property pursuant to Title 18, United States Code, Section 982(a)(6):

a.. any conveyance, including any vessel, vehicle, or aircraft used in the commission of such violation; and

b. any property real or personal--

i. that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from such violation; or

ii. that is used to facilitate, or is intended to be used to facilitate, the commission of such violation.

5. Upon conviction of a violation of Title 18, United States Code, Section 1952, as alleged in this Indictment, the defendant so convicted shall forfeit to the United States all of their respective right, title and interest in any property, real or personal, which constitutes or is derived from proceeds traceable to such violation pursuant to Title 18, United States Code, Section 981(a)(1)(C), as made applicable by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Sections 981 and 982 and and Title 21, United States Code, Section 853.

**A TRUE BILL**

**FOREPERSON** ✓

  
WIFREDO A. FERRER  
UNITED STATES ATTORNEY

  
RICHARD GREGORIE  
ASSISTANT UNITED STATES ATTORNEY