

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

EFRAIN ANTONIO CAMPO FLORES and  
FRANQUI FRANCISCO FLORES DE FREITAS,

Defendants.

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: **SEALED**  
: **SUPERSEDING**  
: **INDICTMENT**

: S2 15 Cr. 761

COUNT ONE

The Grand Jury charges:

1. From at least in or about October 2015, up to and including the date of this Indictment, in Venezuela and elsewhere, and in an offense begun and committed outside of the jurisdiction of any particular State or district of the United States, EFRAIN ANTONIO CAMPO FLORES and FRANQUI FRANCISCO FLORES DE FREITAS, the defendants, at least one of whom will be first brought to and arrested in the Southern District of New York and whose point of entry into the United States will be in the Southern District of New York, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that EFRAIN ANTONIO CAMPO FLORES and FRANQUI FRANCISCO FLORES DE

FREITAS, the defendants, and others known and unknown, would and did import into the United States and into the customs territory of the United States from a place outside thereof a controlled substance, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

3. It was further a part and an object of the conspiracy that EFRAIN ANTONIO CAMPO FLORES and FRANQUI FRANCISCO FLORES DE FREITAS, the defendants, and others known and unknown, would and did manufacture and distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

4. The controlled substance that EFRAIN ANTONIO CAMPO FLORES and FRANQUI FRANCISCO FLORES DE FREITAS, the defendants, conspired to (i) import into the United States and into the customs territory of the United States from a place outside thereof and (ii) manufacture and distribute, intending and knowing that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States from a place outside thereof, was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, its salts, optical

and geometric isomers, and salts of isomers, in violation of Title 21, United States Code, Section 960(b)(1)(B)(ii).

Overt Act

5. In furtherance of the conspiracy, and to effect the illegal objects thereof, the following overt act was performed, among others:

a. In or about October 2015, EFRAIN ANTONIO CAMPO FLORES and FRANQUI FRANCISCO FLORES DE FREITAS, the defendants, participated in meetings in Venezuela, regarding a shipment of cocaine that was to be sent to the United States, via Honduras.

(Title 21, United States Code, Sections 959(c) & 963;  
Title 18, United States Code, Section 3238.)

FORFEITURE ALLEGATION

6. As a result of committing the controlled substance offense charged in Count One of this Indictment, EFRAIN ANTONIO CAMPO FLORES and FRANQUI FRANCISCO FLORES DE FREITAS, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense charged in Count One of this Indictment.

Substitute Assets Provision

7. If any of the above-described forfeitable property, as a result of any act or omission of EFRAIN ANTONIO CAMPO FLORES and FRANQUI FRANCISCO FLORES DE FREITAS, the defendants, :

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, Sections 853(p) and 970, to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 853 & 970.)

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F [REDACTED]

  
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PREET BHARARA *pro*  
United States Attorney

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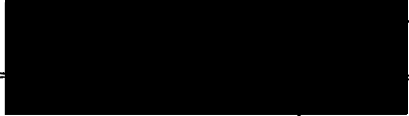
SEALED  
SUPERSEDING  
INDICTMENT

S2 15 Cr.

(21 U.S.C. §§ 959(c) & 963; and  
18 U.S.C. § 3238.)

PREET BHARARA  
United States Attorney.

A TRUE BILL

 Foreperson.

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