UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA v. JAIME ESTRADA MEDRANDA, JAIME ESTRADA BONILLA, JACOBO ABDALA BUCARAM-PULLEY, GEOVANNY FERNANDEZ MENENDEZ, and WILLIAM JOSE BRIONES LOPEZ, a/k/a "Cachete," Defendants.	**SEALED SUPERSEDING INDICTMENT** S1 26 Cr. 14

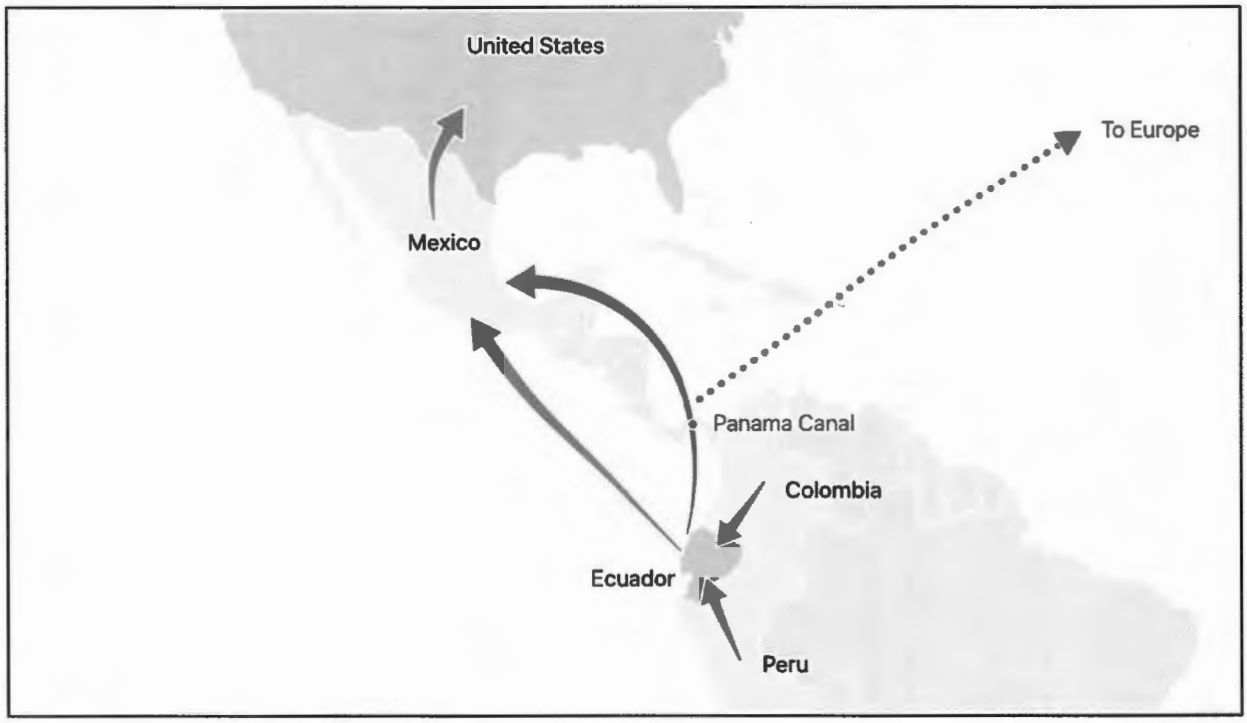
The Grand Jury charges:

INTRODUCTION

1. Ecuador sits at the heart of the global cocaine trade. Like other countries in the region, it is beset by rampant corruption and partnership between narco-politicians and large-scale narcotics traffickers. Two such narco-politicians are JAIME ESTRADA MEDRANDA, the defendant, a former elected member of the Ecuadorian National Assembly, and JAIME ESTRADA BONILLA, the defendant, the former mayor of Manta, Ecuador, the former president of the Port Authority of Manta, and MEDRANDA's father. MEDRANDA and BONILLA have long partnered with some of the region's largest and most violent traffickers, including JACOBO ABDALA BUCARAM-PULLEY, the defendant, and others who have helped facilitate the transport of drug loads, including GEOVANNY FERNANDEZ MENENDEZ and WILLIAM JOSE BRIONES LOPEZ, a/k/a "Cachete," the defendants. As described further below, this conspiracy has resulted in the importation of massive quantities of cocaine to the United States,

and it has contributed to the deteriorating internal security of Ecuador and corruption of its political systems.

2. The vast majority of the world's cocaine supply is cultivated and produced in laboratories in Colombia and Peru, operated by violent drug trafficking and paramilitary organizations. Approximately 70 percent of this supply is then smuggled into and across Ecuador and exported internationally out of Ecuador's main seaports, including in the coastal cities of Manta, in Manabi Province, and Guayaquil, in Guayas Province. Cocaine traffickers operating in Ecuador and the broader region exploit legal commercial maritime routes to conceal their narcotics, using container ships and other commercial vessels transporting legitimate commodities, including seafood, bananas, timber, and minerals, as well as an extensive network of fishing vessels and "go-fast" boats, to smuggle cocaine to the United States and other international markets. The image below depicts the movement of cocaine from Colombia and Peru, through Ecuador, and on to international destinations, including the United States:



3. Until approximately a decade ago, Ecuador had one of the lowest crime rates of any country in Latin America. It is now considered one of the most dangerous and violent nations in the region. In large part, this shift has been fueled by the cocaine trade, as Ecuador's transformation into the world's primary cocaine transit hub over the past decade has enriched and fueled the rise of heavily armed drug trafficking and terrorist organizations, which carry out violence and murder. As a result, the homicide rate in Ecuador has increased approximately sixfold since 2018, and Ecuador now has the highest homicide rate of any country in South America.

4. On or about January 9, 2024, the Government of Ecuador declared a state of "internal armed conflict" and designated as terrorist organizations several criminal groups operating in the country. Among those groups designated by the Ecuadorian government were *Los Choneros* and *Los Lobos*, two of the largest and most violent drug trafficking organizations in the world. On or about September 4, 2025, the U.S. Department of State designated *Los Choneros* and *Los Lobos* as Foreign Terrorist Organizations ("FTOs") and Specially Designated Global Terrorists ("SDGTs"). In announcing the designations, the U.S. Secretary of State stated: "*Los Choneros* and *Los Lobos* have attacked and threatened public officials and their families, security personnel, judges, prosecutors, and journalists in Ecuador. Both *Los Choneros* and *Los Lobos* are linked to U.S.-designated FTOs and SDGTs Cártel de Sinaloa and Cártel de Jalisco Nueva Generación.[1] Their ultimate goal is to control drug trafficking routes through Ecuador by terrorizing and inflicting brutal violence on the Ecuadorian people."

[1] Cártel de Sinaloa and Cártel de Jalisco Nueva Generación are the two largest and most powerful drug cartels in Mexico, and are responsible for trafficking narcotics including cocaine, fentanyl, heroin, and methamphetamine into the United States.

5. The cocaine trade has both degraded Ecuador's internal security and undermined many of its political and economic institutions. A sweeping investigation led by Ecuador's Attorney General's Office, made public in or about December 2023, exposed a network of officials and politicians who protected cocaine traffickers and shielded them from prosecution, contributing to "the deep structural decomposition" in the country. Between in or about 2021 and in or about 2024, a series of port seizures of hundreds of tons of cocaine further revealed how trafficking networks have exploited Ecuador's legitimate export trade, concealing cocaine in shipments of seafood and produce bound for the United States and Europe. On or about August 20, 2026, the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") designated 15 Ecuador-based targets and identified as blocked property 10 vessels involved in covertly shipping thousands of kilograms of cocaine each month from South America to Mexico, destined for distribution in the United States.

THE DEFENDANTS

6. JAIME ESTRADA MEDRANDA, the defendant, is a former elected member of the Ecuadorian National Assembly,[2] representing a district within the province of Manabi that includes the coastal city of Manta—the center of Ecuador's tuna-processing industry and home to one of Ecuador's largest ports, and which serves as a major transit point for the global cocaine supply. MEDRANDA is also the President of a professional soccer club ("Club-1") in the Ecuadorian national league and, since at least in or about 2019, has been an executive of a major seafood exporting company located near Manta ("Company-1"). Company-1 states on its public website that it "[maintains business relationships] with leading companies in the European

[2] The National Assembly is the unicameral legislative body of Ecuador, with the power to pass national laws. It is comprised of 151 seats and members serve four-year terms. MEDRANDA was a National Assembly member from in or about May 2025 until in or about August 2026.

Community, Colombia, Peru, Chile, Venezuela, and the United States" and "exports its products to 18 countries, between America and Europe." As described in greater detail below, MEDRANDA and JAIME ESTRADA BONILLA, the defendant, in partnership with major narcotics traffickers operating in Ecuador and beyond, have for years used Company-1 to smuggle out of Ecuador vast quantities of cocaine concealed in commercial shipping containers containing seafood destined for the United States and Europe.

7. JAIME ESTRADA BONILLA, the defendant, is the former mayor of Manta,[3] the former President of the Port Authority of Manta,[4] and the father of JAIME ESTRADA MEDRANDA, the defendant. BONILLA is also the owner and founder of Club-1 and the owner of Company-1, which, as described herein, BONILLA and MEDRANDA have for years used to export vast quantities of cocaine out of Ecuador.

8. JACOBO ABDALA BUCARAM-PULLEY, the defendant, is an Ecuadorian drug and firearms trafficker who has used multiple export companies, including Company-1, to traffic ton-quantity shipments of cocaine for distribution in the United States and Europe. BUCARAM-PULLEY is also the son of a former President of Ecuador.

9. GEOVANNY FERNANDEZ MENENDEZ and WILLIAM JOSE BRIONES LOPEZ, a/k/a "Cachete," the defendants, work in the fishing industry in or around Manta and, as representatives of JAIME ESTRADA MEDRANDA and JAIME ESTRADA BONILLA, the defendants, and others, have brokered and coordinated deals with major narcotics traffickers to

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[3] BONILLA served as the mayor of Manta from in or about July 2009 until in or about May 2014.

[4] The Port Authority of Manta controls the operations of the port of Manta, which is a primary port facility on the Pacific coast of Ecuador and major component of Ecuador's maritime infrastructure. The port of Manta features dedicated terminals for cargo shipping, commercial fishing, and cruise ship operations.

use the illicit services of Company-1 and other fishing businesses in the region to smuggle ton-quantity shipments of cocaine out of Ecuador.

THE DEFENDANTS' TRAFFICKING OF MASSIVE QUANTITIES OF COLOMBIAN COCAINE TO THE UNITED STATES AND ELSEWHERE THROUGH ECUADORIAN PORTS

10. For years, JAIME ESTRADA MEDRANDA and JAIME ESTRADA BONILLA, the defendants, have partnered with powerful drug traffickers, including JACOBO ABDALA BUCARAM-PULLEY, GEOVANNY FERNANDEZ MENENDEZ, and WILLIAM JOSE BRIONES LOPEZ, a/k/a "Cachete," the defendants, to use Company-1 to export tons of cocaine to the United States and Europe, including as follows:

a. MEDRANDA and BONILLA have conspired with large-scale drug traffickers, including the leaders of violent drug trafficking and terrorist organizations such as *Los Choneros* and *Los Lobos*. Those traffickers routinely use machineguns to protect their drug loads, to engage in armed conflict with rivals, and to maintain and increase their influence over the lucrative drug trade in Ecuador.

b. Many of the cocaine loads that the defendants have conspired to export were sourced from paramilitary groups operating in the jungles of Colombia, including the *Fuerzas Armadas Revolucionarias de Colombia* ("FARC") dissident group *Commandos de la Frontera* ("CDF").[5] Those paramilitary groups similarly use machineguns and violence to protect their drug production laboratories and cocaine loads.

c. MEDRANDA and BONILLA charge their drug-trafficker partners significant fees, paid in bulk cash at MEDRANDA's or BONILLA's homes or in hotel rooms, for

[5] CDF is a criminal organization classified as an Organized Armed Group by the Colombian Government. It is composed primarily of FARC dissidents and operates along the Colombia-Ecuador border, mainly in the region of Putumayo. It produces and traffics cocaine in the areas under its control to generate revenue.

the traffickers' use of Company-1's shipping containers. Those fees are based on either a price-per-kilogram rate or a total flat fee of several hundred thousand dollars per shipment, depending on the terms of the deal.

d. To facilitate smuggling drugs through Company-1, MEDRANDA and BONILLA require their trafficking associates to place orders for seafood purchases through Company-1's legitimate channels. Once a nominally legitimate order is placed, the cocaine is then packed within the shipping container fulfilling that purchase order and transported to a port to be loaded onto a container ship. Because MEDRANDA and BONILLA have partnered with leaders of Ecuador's most powerful drug trafficking organizations to export their cocaine, those gangs, including *Los Choneros*, have in turn provided protection, including armed security, for the illicit drug exportation operations of Company-1 in and around Manta and elsewhere.

e. To minimize the risk to themselves, MEDRANDA and BONILLA rely on trusted intermediaries, including BUCARAM-PULLEY, MENENDEZ, and LOPEZ to meet with drug traffickers, receive payments, and coordinate the logistics of receiving, packing, and smuggling cocaine out of Ecuador using containers packed with legitimate goods, such as tuna.

11. For example, from in or about March 2026 through in or about August 2026, JAIME ESTRADA MEDRANDA, JACOBO ABDALA BUCARAM-PULLEY, GEOVANNY FERNANDEZ MENENDEZ, and WILLIAM JOSE BRIONES LOPEZ, a/k/a "Cachete," the defendants, participated in calls and meetings regarding a deal to smuggle approximately 2,000 kilograms of cocaine to Mexico, for distribution in the United States, inside shipments of Company-1's products. In setting up the deal, BUCARAM explained that he knew JAIME ESTRADA BONILLA, the defendant, and MEDRANDA, and had worked with them in the past to transport cocaine using Company-1. MENENDEZ and LOPEZ also confirmed that

MEDRANDA would agree to use Company-1 to facilitate the cocaine shipment, but that MEDRANDA did not want to be seen meeting with narcotics traffickers directly, due to his political ambitions. Ultimately, MEDRANDA approved the deal on a video call, after receiving a down payment of approximately $10,000 in exchange for using Company-1 to transport the 2,000 kilograms of cocaine.

12. In another example, in or about 2023, Company-1, owned and operated by JAIME ESTRADA MEDRANDA and JAIME ESTRADA BONILLA, the defendants, was similarly used to export ton-quantity shipments of cocaine out of Ecuadorian seaports. On or about May 27, 2023, the Ecuadorian National Police seized approximately 1,444 kilograms of suspected cocaine inside of a shipping container at the Port of Guayaquil. Company-1 was listed as the exporting company on the bill of lading for the container, which stated that it contained "canned tuna in sunflower oil." In fact, bulk cocaine was concealed inside black duffel bags in the container. The image below depicts cocaine seized from the shipping container of Company-1:



STATUTORY ALLEGATIONS

COUNT ONE
(Narcotics Importation Conspiracy)

13. Paragraphs 1 through 12 of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

14. From at least in or about 2010, up to and including on or about the date of the filing of this Indictment, in Ecuador, Colombia, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, JAIME ESTRADA MEDRANDA, JAIME ESTRADA BONILLA, JACOBO ABDALA BUCARAM-PULLEY, GEOVANNY FERNANDEZ MENENDEZ, and WILLIAM JOSE BRIONES LOPEZ, a/k/a "Cachete," the defendants, and others known and unknown, at least one of whom has been first brought to and arrested in the Southern District of New York, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

15. It was a part and an object of the conspiracy that JAIME ESTRADA MEDRANDA, JAIME ESTRADA BONILLA, JACOBO ABDALA BUCARAM-PULLEY, GEOVANNY FERNANDEZ MENENDEZ, and WILLIAM JOSE BRIONES LOPEZ, a/k/a "Cachete," 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).

16. It was further a part and an object of the conspiracy that JAIME ESTRADA MEDRANDA, JAIME ESTRADA BONILLA, JACOBO ABDALA BUCARAM-PULLEY, GEOVANNY FERNANDEZ MENENDEZ, and WILLIAM JOSE BRIONES LOPEZ, a/k/a "Cachete," the defendants, and others known and unknown, would and did manufacture and

distribute a controlled substance, intending, knowing, and having reasonable cause to believe 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, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

17. The controlled substance that JAIME ESTRADA MEDRANDA, JAIME ESTRADA BONILLA, JACOBO ABDALA BUCARAM-PULLEY, GEOVANNY FERNANDEZ MENENDEZ, and WILLIAM JOSE BRIONES LOPEZ, a/k/a "Cachete," the defendants, conspired to (a) import into the United States and into the customs territory of the United States from a place outside thereof; and (b) manufacture and distribute, intending, knowing, and having reasonable cause to believe 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, was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 960(b)(1)(B).

(Title 21, United States Code, Section 963;
and Title 18, United States Code, Section 3238.)

COUNT TWO
(Possession of Machineguns)

The Grand Jury further charges:

18. Paragraphs 1 through 12 of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

19. From at least in or about 2010, up to and including the present, in Ecuador, Colombia, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, and for which at least one of two or more joint offenders has been first brought to and arrested in the Southern District of New York, JAIME

ESTRADA MEDRANDA, JAIME ESTRADA BONILLA, JACOBO ABDALA BUCARAM-PULLEY, GEOVANNY FERNANDEZ MENENDEZ, and WILLIAM JOSE BRIONES LOPEZ, a/k/a "Cachete," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit, the narcotics importation conspiracy charged in Count One of this Superseding Indictment, knowingly used and carried firearms, and, in furtherance of such crime, knowingly possessed firearms, and aided and abetted the use, carrying, and possession of firearms, including semiautomatic assault weapons and machineguns that were capable of automatically shooting more than one shot, without manually reloading, by a single function of the trigger.

(Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(B)(i), 924(c)(1)(B)(ii), 3238, and 2.)

COUNT THREE
(Conspiracy to Possess Machineguns)

The Grand Jury further charges:

20. Paragraphs 1 through 12 of this Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

21. From at least in or about 2010, up to and including the present, in Ecuador, Colombia, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, JAIME ESTRADA MEDRANDA, JAIME ESTRADA BONILLA, JACOBO ABDALA BUCARAM-PULLEY, GEOVANNY FERNANDEZ MENENDEZ, and WILLIAM JOSE BRIONES LOPEZ, a/k/a "Cachete," the defendants, and others known and unknown, at least one of whom has been first brought to and arrested in the Southern District of New York, intentionally and knowingly combined, conspired,

confederated, and agreed together and with each other to violate Title 18, United States Code, Section 924(c).

22. It was a part and an object of the conspiracy that JAIME ESTRADA MEDRANDA, JAIME ESTRADA BONILLA, JACOBO ABDALA BUCARAM-PULLEY, GEOVANNY FERNANDEZ MENENDEZ, and WILLIAM JOSE BRIONES LOPEZ, a/k/a "Cachete," the defendants, and others known and unknown, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit, the narcotics importation conspiracy charged in Count One of this Superseding Indictment, would and did knowingly use and carry firearms, and, in furtherance of such crime, knowingly possess firearms, including semiautomatic assault weapons and machineguns that were capable of automatically shooting more than one shot, without manually reloading, by a single function of the trigger, in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(B)(i), and 924(c)(1)(B)(ii).

(Title 18, United States Code, Sections 924(o) and 3238.)

FORFEITURE ALLEGATIONS

23. As a result of committing the controlled substance offense charged in Count One of this Superseding Indictment, JAIME ESTRADA MEDRANDA, JAIME ESTRADA BONILLA, JACOBO ABDALA BUCARAM-PULLEY, GEOVANNY FERNANDEZ MENENDEZ, and WILLIAM JOSE BRIONES LOPEZ, a/k/a "Cachete," 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 obtained, directly or indirectly, as a result of said offense, and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense.

24. As a result of committing the firearms offenses charged in Counts Two and Three of this Superseding Indictment, JAIME ESTRADA MEDRANDA, JAIME ESTRADA BONILLA, JACOBO ABDALA BUCARAM-PULLEY, GEOVANNY FERNANDEZ MENENDEZ, and WILLIAM JOSE BRIONES LOPEZ, a/k/a "Cachete," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), all firearms and ammunition involved in and used in the commission of the offenses charged in Counts Two and Three of this Superseding Indictment.

Substitute Assets Provision

25. If any of the above-described forfeitable property, as a result of any act or omission of 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, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 924(d);
Title 21, United States Code, Sections 853 and 970; and
Title 28, United States Code, Section 2461(c).)

[redacted] 9/24/26

FOREPERSON

JAMES M. MCDONALD
United States Attorney