

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- v. -

MICHOLS ORSINI QUINTERO,

Defendant.

SUPERSEDING INDICTMENT

S3

**19 CRIM 144**

- - - - - X

COUNT ONE

**(Conspiracy to Violate and Evade the Foreign Narcotics Kingpin Designation Act and the Kingpin Act Regulations)**

The Grand Jury charges:

1. From at least in or about February 2017, up to and including in or about March 2019, in the Southern District of New York, Venezuela, Turkey, Russia, the Dominican Republic, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or district of the United States, MICHOLS ORSINI QUINTERO, the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and willfully combined, conspired, confederated, and agreed together and with each other to violate one or more of the provisions of the Foreign Narcotics Kingpin Designation Act ("Kingpin Act") and related Kingpin Act regulations.

2. It was a part and an object of the conspiracy that MICHOLS ORSINI QUINTERO, the defendant, and others known and unknown, would and did engage and attempt to engage in transactions and dealings by a United States person, and within the United States, in property and interests in property of one or more foreign persons designated as Specially Designated Narcotics Traffickers by the Secretary of the Treasury pursuant to Title 21, United States Code, Section 1904(b), in violation of Title 21, United States Code, Section 1904(c)(1), and Title 31, Code of Federal Regulations, Sections 598.203(a) and 598.406.

3. It was further a part and an object of the conspiracy that MICHOLS ORSINI QUINTERO, the defendant, and others known and unknown, would and did engage and attempt to engage in transactions and dealings by a United States person, and within the United States, that evaded and avoided, and had the effect of evading and avoiding, one or more of the prohibitions contained in the Kingpin Act, in violation of Title 21, United States Code, Section 1904(c)(2), and Title 31, Code of Federal Regulations, Section 598.204.

4. It was further a part and an object of the conspiracy that MICHOLS ORSINI QUINTERO, the defendant, and others known and unknown, would and did engage and attempt to engage in transactions and dealings by one or more United States persons who

