

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

TARECK ZAIDAN EL AISSAMI MADDAH,
a/k/a "Tareck El Aissami,"
a/k/a "El Troupial,"
a/k/a "Tango Alpha,"
a/k/a "T.E.A.,"

SAMARK JOSE LOPEZ BELLO,
a/k/a "Samark Lopez Delgado,"
a/k/a "Sierra Lima,"

VICTOR MONES CORO,
a/k/a "Victor Mones," and

ALEJANDRO MIGUEL LEON MAAL,
a/k/a "Alejandro Leon,"

Defendants.

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: **SUPERSEDING INDICTMENT**

S4

19 CRIM 144

COUNT ONE

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

The Grand Jury charges:

OVERVIEW

1. Beginning in or about February 2017, Venezuelan official TARECK ZAIDAN EL AISSAMI MADDAH, a/k/a "Tareck El Aissami," a/k/a "El Troupial," a/k/a "Tango Alpha," a/k/a "T.E.A.," the defendant, and his associate SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendant, worked together and with others in an effort to violate and evade

sanctions imposed by the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") pursuant to the Foreign Narcotics Kingpin Designation Act (the "Kingpin Act") and related regulations.

2. In connection with the unlawful scheme to violate and evade OFAC's sanctions, U.S. citizens VICTOR MONES CORO, a/k/a "Victor Mones," and ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendants, and others known and unknown, used U.S.-based companies to charter private flights, including at times on U.S.-registered aircraft, for TARECK ZAIDAN EL AISSAMI MADDAH, a/k/a "Tareck El Aissami," a/k/a "El Troupial," a/k/a "Tango Alpha," a/k/a "T.E.A.," and SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendants, in connection with travel in and between, among other places, Venezuela, Russia, Turkey, and the Dominican Republic.

3. In violation of OFAC's sanctions and related statutes and regulations, TARECK ZAIDAN EL AISSAMI MADDAH, a/k/a "Tareck El Aissami," a/k/a "El Troupial," a/k/a "Tango Alpha," a/k/a "T.E.A.," and SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendants, paid VICTOR MONES CORO, a/k/a "Victor Mones," and ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendants, for private flights and other flight-related services by, among other means, using associates to

