

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.," :

SUPERSEDING INDICTMENT

S5 19 Cr. 144 (AKH)

JOSELIT RAMIREZ CAMACHO, :

a/k/a "J.L.," :

a/k/a "Jose Lit," and :

SAMARK JOSE LOPEZ BELLO, :

a/k/a "Samark Lopez Delgado," :

a/k/a "Sierra Lima," :

Defendants. :

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COUNT ONE

(Conspiracy to Defraud the United States)

The Grand Jury charges:

Overview

1. Beginning in or about February 2017, up to and including in or about March 2019, Venezuelan officials 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 JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," the defendants, and their associates, including SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendant, worked

together and with others to defraud the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"), violate and evade sanctions imposed by OFAC pursuant to the International Emergency Economic Powers Act ("IEEPA") and the Foreign Narcotics Kingpin Designation Act (the "Kingpin Act"), and launder funds used in transactions that violated OFAC's sanctions.

2. In connection with the unlawful scheme to defraud OFAC, and to violate and evade OFAC's sanctions targeting Venezuela's *de facto* ruler Nicolás Maduro Moros, 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 JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," the defendants, and others known and unknown, used U.S.-based companies to charter private flights, including at times on U.S.-registered aircraft, in connection with Maduro Moros' 2018 campaign for the Venezuelan presidency, including flights for EL AISSAMI MADDAH, who was at the time the vice president of Venezuela and also an OFAC-sanctioned Specially Designated Narcotics Trafficker. Although Maduro Moros claimed to have won the May 2018 presidential election in Venezuela, more than 50 countries, including the United States, subsequently refused to recognize Maduro Moros as the Venezuelan head of state. In or about 2019, the National Assembly of Venezuela invoked the

Venezuelan constitution and declared that Maduro Moros had usurped power and was not the president of Venezuela.

3. In connection with the unlawful scheme to defraud OFAC, and to violate and evade OFAC's sanctions targeting Venezuelan vice president 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, EL AISSAMI MADDAH, LOPEZ BELLO, and JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," 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 EL AISSAMI MADDAH and LOPEZ BELLO in connection with travel in and between, among other places, Venezuela, Russia, Turkey, and the Dominican Republic.

4. In connection with the unlawful scheme to defraud OFAC, and to violate and evade OFAC's sanctions, 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.," JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," and SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendants, paid U.S. persons and U.S.-based companies for private flights and other flight-related services by, among other means, using associates to

deliver bulk cash in Caracas, Venezuela to be smuggled into the United States.

The Defendants and Related Entities

5. 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, is a Venezuelan citizen and, as of in or about March 2020, the purported vice president for the Economy of Venezuela. EL AISSAMI MADDAH previously acted as the Venezuelan Minister of Industry and National Production in or about 2019, the vice president of Venezuela between in or about 2017 and in or about 2018, the Governor of Venezuela's Aragua State between in or 2012 and in or about 2017, and the Venezuelan Minister of the Interior and Justice between in or 2008 and in or about 2012. In or about July 2019, U.S. Immigration and Customs Enforcement named EL AISSAMI one of its top-10 most wanted fugitives based on the then-pending charges in this case.

6. JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," the defendant, is a Venezuelan citizen and, since in or about June 2018, the Superintendent of Cryptocurrencies for Venezuela, which is referred to as "Sunacrip." Suncacrip oversees Venezuela's virtual currency, the "Petro," which is purportedly backed by the country's oil and mineral reserves. In or about March 2018, President Donald Trump issued Executive Order 13827 pursuant to

IEEPA, among other statutes, that barred U.S. persons from participating in transactions involving any "digital currency, digital coin, or digital token" issued by Venezuela's government.

7. SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendant, is a Venezuelan citizen and businessman with ties to TARECK ZAIDAN EL AISSAMI MADDAH, a/k/a "Tareck El Aissami," the defendant, and other Venezuelan politicians. According to filings with the U.S. Department of Homeland Security, LOPEZ BELLO has acted at various times relevant to the charges herein as an executive of, among other entities, the Florida corporation PYP International LLC; PYP International LLC's Venezuelan affiliate, Profit Corporation C.A.; and PYP International LLC's Panamanian affiliate, Yakima Trading Corporation. In or about July 2019, U.S. Immigration and Customs Enforcement named LOPEZ BELLO one of its top-10 most wanted fugitives based on the then-pending charges in this case.

The International Emergency Economic Powers Act

8. In 1977, Congress enacted the International Emergency Economic Powers Act, codified at Title 50, United States Code, Sections 1701-1706. The IEEPA confers upon the President authority to deal with any "unusual and extraordinary threat" to

the "national security, foreign policy, or economy of the United States." 50 U.S.C. § 1701(a).

9. In March 2015, President Barack Obama issued Executive Order 13692 pursuant to the IEEPA, among other statutes. The Executive Order gave the Secretary of the Treasury, in consultation with the Secretary of State, the authority to target persons involved in "actions or policies undermining democratic processes or institutions"; "significant acts of violence or conduct that constitutes a serious abuse or violation of human rights, including against persons involved in antigovernment protests in Venezuela in or since February 2014"; "actions that prohibit, limit, or penalize the exercise of freedom of expression or peaceful assembly"; and "public corruption by senior officials within the Government of Venezuela."

10. In July 2015, OFAC issued regulations implementing Executive Order 13692 (the "Venezuela Sanctions Regulations"), Title 31, Code of Federal Regulations, Part 591.

11. The IEEPA, Executive Order 13692, and corresponding Venezuela Sanctions Regulations block, among other things, all property and interests in property within the United States, or within the possession or control of any U.S. person, of persons identified in the Annex to, or designated pursuant to, Executive Order 13692.

12. Unless otherwise authorized or exempted by law, license, or regulation, the IEEPA, Executive Order 13692, and the Venezuela Sanctions Regulations prohibit, among other things:

a. Transactions and dealings by U.S. persons, or within the United States, in property or interests in property of individuals listed in, or designated pursuant to, Executive Order 13692. See Executive Order 13692 § 1(a); 31 C.F.R. §§ 591.201, 591.301.

b. Services performed by U.S. persons, wherever located, for the benefit of individuals listed in, or designated pursuant to, Executive Order 13692. See Executive Order 13692 §§ 1(a), 4(a); 31 C.F.R. §§ 591.201, 591.309.

c. Transactions and dealings by U.S. persons, or within the United States, that evade or avoid, or have the effect of evading or avoiding, any of the prohibitions of the IEEPA and the Venezuela Sanctions Regulations. See 50 U.S.C. § 1705(a); Executive Order 13692 § 5(a); 31 C.F.R. § 591.201.

d. Conspiracies and attempts to violate any of the prohibitions of the IEEPA, Executive Order 13692, and the Venezuela Sanctions Regulations. See 50 U.S.C. § 1705(a); Executive Order 13692 § 5(b); 31 C.F.R. § 591.201.

The Foreign Narcotics Kingpin Designation Act

13. In 1999, Congress passed the Kingpin Act, Title 21, United States Code, Chapter 32, to apply economic and other financial sanctions in response to "a national emergency resulting from the activities of international narcotics traffickers and their organizations that threatens the national security, foreign policy, and economy of the United States." 21 U.S.C. § 1901(a)(4).

14. In 2000, OFAC implemented the Kingpin Act by promulgating the Foreign Narcotics Kingpin Sanctions Regulations (the "Kingpin Act Regulations"), Title 31, Code of Federal Regulations, Part 598.

15. The Kingpin Act and corresponding Kingpin Act Regulations block, among other things, all property and interests in property within the United States, or within the possession or control of any U.S. person, which are owned or controlled by foreign persons designated by OFAC as "Specially Designated Narcotics Traffickers," or "SDNTs." 21 U.S.C. § 1904(b); 31 C.F.R. §§ 598.202, 598.301.

16. Unless otherwise authorized or exempted by law, license, or regulation, the Kingpin Act and the Kingpin Act Regulations prohibit, among other things:

a. Transactions and dealings by U.S. persons, or within the United States, in property or interests in property of

Specially Designated Narcotics Traffickers. See 21 U.S.C. § 1904(c)(1); 31 C.F.R. § 598.203(a).

b. Services performed by U.S. persons, wherever located, on behalf of or for the benefit of Specially Designated Narcotics Traffickers or with respect to property interests of Specially Designated Narcotics Traffickers. See 21 U.S.C. § 1904(c)(1); 31 C.F.R. §§ 598.203, 598.406(a).

c. Transactions and dealings by U.S. persons, or within the United States, that evade or avoid, or have the effect of evading or avoiding, any of the prohibitions of the Kingpin Act and the Kingpin Act Regulations. See 21 U.S.C. § 1904(c)(2); 31 C.F.R. § 598.204.

d. Any endeavor, attempt, or conspiracy to violate any of the prohibitions of the Kingpin Act and the Kingpin Act Regulations. See 21 U.S.C. § 1904(c)(2); 31 C.F.R. § 598.204.

OFAC's February 2017 SDNT Designation
Pursuant to the Kingpin Act

17. On or about February 13, 2017, OFAC announced that it had designated 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, as Specially Designated Narcotics Traffickers pursuant to the Kingpin Act. In

the same announcement, OFAC designated as SDNTs 13 related companies, including Profit Corporation C.A. and Yakima Trading Corporation.

18. OFAC explained in the February 13, 2017 announcement, that "U.S. persons are generally prohibited from engaging in transactions or otherwise dealing with" 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, and that "any assets the individuals and entities may have under U.S. jurisdiction are frozen."

OFAC's July 2017 SDN Designation of Maduro
Pursuant to Executive Order 13692

19. On or about July 31, 2017, OFAC announced that it had designated then-president of Venezuela Nicolás Maduro Moros, pursuant to Executive Order 13692. OFAC noted in the announcement that the "sanctions come a day after the Maduro government held elections for a National Constituent Assembly . . . that aspires illegitimately to usurp the constitutional role of the democratically elected National Assembly, rewrite the constitution, and impose an authoritarian regime on the people of Venezuela."

20. OFAC also explained in the July 31, 2017 announcement, that "all assets of Nicolás Maduro subject to U.S. jurisdiction are frozen, and U.S. persons are prohibited from dealing with him."

STATUTORY ALLEGATIONS

21. 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, 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.," JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," and SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendants, 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 combined, conspired, confederated, and agreed together and with each other to defraud the United States and an agency thereof, to wit, the U.S. Department of the Treasury and OFAC.

22. It was a part and an object of the conspiracy that 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 JOSELIT

RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," the defendants, and others known and unknown, would and did defraud the United States by impairing, obstructing, and defeating the lawful functions of the Treasury Department and OFAC, to wit, by engaging in transactions and obtaining services in violation of the IEEPA, Executive Order 13692, and the Venezuelan Sanctions Regulations.

23. It was a further part and an object of the conspiracy that 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.," JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendants, and others known and unknown, would and did defraud the United States by impairing, obstructing, and defeating the lawful functions of the Treasury Department and OFAC, to wit, by engaging in transactions and obtaining services in violation of the Kingpin Act and the Kingpin Act Regulations.

Overt Acts

24. In furtherance of the conspiracy and to effect the illegal objects thereof, 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.," JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a

"Sierra Lima," the defendants, and their co-conspirators committed the following overt acts, among others:

a. In or about March 2018, RAMIREZ CAMACHO and others helped arrange private charters for EL AISSAMI MADDAH and others to travel within Venezuela to attend campaign rallies related to Maduro Moros's presidential campaign. The flights also sometimes transported campaign materials and supplies in support of Maduro Moros's campaign.

b. In or about July 2018, RAMIREZ CAMACHO worked with others to smuggle bulk cash from Simón Bolívar International Airport in Maiquetía, Venezuela to the United States, which related to services provided to EL AISSAMI MADDAH and LOPEZ BELLO.

c. In or about September 2018, LOPEZ BELLO took a private flight on a U.S.-registered aircraft from the Dominican Republic to Venezuela.

d. In or about February 2019, EL AISSAMI MADDAH traveled from Venezuela to Russia, via Turkey, for one or more meetings with Russian officials.

e. In or about March 2019, RAMIREZ CAMACHO instructed a U.S. person to open a bank account and incorporate a business entity in Istanbul, Turkey, to be used in the scheme to avoid and evade OFAC's sanctions.

(Title 18, United States Code, Sections 371 and 3238.)

COUNT TWO
**(Conspiracy to Violate the International
Emergency Economic Powers Act)**

The Grand Jury further charges:

25. The allegations contained in paragraphs 1 through 20 and 24 of this Superseding Indictment are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

26. 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, 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 JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," the defendants, 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 did combine, conspire, confederate, and agree together and with each other to violate, and to cause a violation of, licenses, orders, regulations, and prohibitions issued under the International

Emergency Economic Powers Act, codified at Title 50, United States Code, Sections 1701-1706.

27. It was a part and an object of the conspiracy that 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 JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," the defendants, and others known and unknown, would and did provide and cause others to provide services to benefit a person designated as a Specially Designated National by OFAC, to wit, private charter services for the benefit of Nicolas Maduro Moros in connection with efforts to maintain control in Venezuela, in violation of 50 U.S.C. § 1705(a), 31 C.F.R. §§ 591.201, and Executive Order 13692.

28. It was further a part and an object of the conspiracy that 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 JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," the defendants, and others known and unknown, would and did evade and avoid, and attempt to evade and avoid, the requirements of U.S. law with respect to the provision of services to Nicolas Maduro Moros, to wit, private charter services for the benefit of Maduro Moros in connection with efforts to maintain control in Venezuela, in violation of 50 U.S.C. § 1705(a), 31 C.F.R. §§ 591.201, and Executive Order 13692.

(Title 50, United States Code, Section 1705;
Title 18, United States Code, Section 3238;
Executive Order 13692; Title 31, Code of Federal Regulations,
Sections 591.201, 591.301, and 591.309.)

COUNT THREE
(Conspiracy to Commit Money Laundering)

The Grand Jury further charges:

29. The allegations contained in paragraphs 1 through 20 and 24 of this Superseding Indictment are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

30. 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, 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 JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," the defendants, 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 intentionally combined, conspired, confederated, and agreed together and with each other, to commit money laundering offenses in violation of Title 18, United States Code, Section 1956.

31. It was a part and an object of the conspiracy that 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 JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, transactions and services in violation of section 206 of the IEEPA, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

32. It was further a part and an object of the conspiracy that 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 JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, would and did transport, transmit, and transfer, and attempt to transport,

transmit, and transfer, a monetary instrument and funds from a place in the United States to and through a place outside the United States and to a place in the United States from and through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, transactions and services in violation of section 206 of the IEEPA, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

(Title 18, United States Code, Sections 1956(h) and 3238.)

COUNT FOUR

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

The Grand Jury further charges:

33. The allegations contained in paragraphs 1 through 20 and 24 of this Superseding Indictment are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

34. 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, 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.," JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," and SAMARK JOSE

LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendants, 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, willfully combined, conspired, confederated, and agreed together and with each other to violate one or more of the provisions of the Kingpin Act and the Kingpin Act Regulations.

35. It was a part and an object of the conspiracy that 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.," JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," and SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendants, 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), to wit, EL AISSAMI MADDAH and LOPEZ BELLO, 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.

36. It was further a part and an object of the conspiracy that 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.," JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," and SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendants, 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.

37. It was further a part and an object of the conspiracy that 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.," JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," and SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendants, 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 were officers, directors, and agents of an entity -- to wit, agents of American Charter Services LLC and SVMi Solution LLC -- 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), to wit, EL AISSAMI MADDAH and LOPEZ

BELLO, in violation of Title 21, United States Code, Sections 1904(c)(1) and 1906(a)(2), and Title 31, Code of Federal Regulations, Sections 598.203(a) and 598.406.

38. It was further a part and an object of the conspiracy that 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.," JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," and SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendants, 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 were officers, directors, and agents of an entity -- to wit, agents of American Charter Services LLC and SVMi Solution LLC -- 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, Sections 1904(c)(2) and 1906(a)(2), and Title 31, Code of Federal Regulations, Section 598.204.

(Title 21, United States Code, Sections 1904(c)(1)-(2) and 1906(a)(1)-(2); Title 18, United States Code, Section 3238; Title 31, Code of Federal Regulations, Sections 598.203(a), 598.204, and 598.406.)

COUNT FIVE

**(Prohibited Transactions in Violation of the Kingpin Act and the
Kingpin Act Regulations)**

The Grand Jury further charges:

39. The allegations contained in paragraphs 1 through 20 and 24 of this Superseding Indictment are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

40. 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, 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.," JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," and SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendants, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, willfully engaged, attempted to engage, and aided, abetted, and caused others to engage and attempt to engage in transactions and dealings by one or more United States persons who were officers, directors, and agents of an entity -- to wit, an agent of American

Charter Services LLC -- 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), to wit, EL AISSAMI MADDAH and LOPEZ BELLO.

(Title 21, United States Code, Sections 1904(c)(1) and 1906(a)(2); Title 18, United States Code, Sections 3238 and 2; and Title 31, Code of Federal Regulations, Sections 598.203(a) and 598.406.)

COUNT SIX

(Evasion of the Kingpin Act and the Kingpin Act Regulations)

The Grand Jury further charges:

41. The allegations contained in paragraphs 1 through 20 and 24 of this Superseding Indictment are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

42. 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, 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.," JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," and SAMARK JOSE

LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendants, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, willfully engaged, attempted to engage, and aided, abetted, and caused others to engage and attempt to engage in transactions and dealings by one or more United States persons who were officers, directors, and agents of an entity -- to wit, an agent of American Charter Services LLC -- 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.

(Title 21, United States Code, Sections 1904(c)(2) and 1906(a)(2); Title 18, United States Code, Sections 3238 and 2; and Title 31, Code of Federal Regulations, Section 598.204.)

COUNT SEVEN

(Prohibited Transactions in Violation of the Kingpin Act and the Kingpin Act Regulations)

The Grand Jury further charges:

43. The allegations contained in paragraphs 1 through 20 and 24 of this Superseding Indictment are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

44. 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, 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.," JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," and SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendants, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, willfully engaged, attempted to engage, and aided, abetted, and caused others to engage and attempt to engage in transactions and dealings by a United States person who was an officer, director, and agent of an entity -- to wit, an agent of SVM I Solution LLC - - 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), to wit, EL AISSAMI MADDAH and LOPEZ BELLO.

(Title 21, United States Code, Sections 1904(c)(1)-(2) and 1906(a)(2); Title 18, United States Code, Sections 3238 and 2; and Title 31, Code of Federal Regulations, Sections 598.203(a) and 598.406.)

COUNT EIGHT

(Evasion of the Kingpin Act and the Kingpin Act Regulations)

The Grand Jury further charges:

45. The allegations contained in paragraphs 1 through 20 and 24 of this Superseding Indictment are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

46. 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, 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.," JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," and SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendants, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, willfully engaged, attempted to engage, and aided, abetted, and caused others to engage and attempt to engage in transactions and dealings by a United States person who was an officer, director, and agent of an entity -- to wit, an agent of SVMI Solution LLC - - 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.

(Title 21, United States Code, Sections 1904(c)(2) and 1906(a)(2); Title 18, United States Code, Sections 3238 and 2; and Title 31, Code of Federal Regulations, Section 598.204.)

FORFEITURE ALLEGATION
(As to Count Two)

47. As a result of committing the offense alleged in Count Two of this Superseding Indictment, 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 JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense alleged in Count Two of this Superseding Indictment, including but not limited to a sum of money representing the amount of proceeds obtained as a result of the offense.

FORFEITURE ALLEGATION
(As to Count Three)

48. As a result of committing the money laundering offense alleged in Count Three of this Superseding Indictment, 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 JOSELIT RAMIREZ CAMACHO, a/k/a "J.L.," a/k/a "Jose Lit," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982, all property, real and personal, involved in the money laundering offense and all property traceable to such property, including but not limited to, a sum of money representing the amount of property that was involved in the money laundering offense alleged in Count Three of this Superseding Indictment or is traceable to such property.

Substitute Assets Provision

49. 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), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 982;
Title 21, United States Code, Section 853;
Title 28, United States Code, Section 2461.)



OREPERSON


GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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.,"
JOSELIT RAMIREZ CAMACHO,
a/k/a "J.L.,"
a/k/a "Jose Lit," and
SAMARK JOSE LOPEZ BELLO,
a/k/a "Samark Lopez Delgado,"
a/k/a "Sierra Lima,"

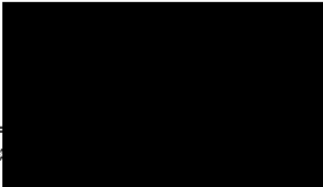
Defendants.

SUPERSEDING INDICTMENT

(21 U.S.C. §§ 1904, 1906; 50 U.S.C. § 1705;
and 18 U.S.C. §§ 371, 1956, 3238, 2.)

GEOFFREY S. BERMAN
United States Attorney.

A TRUE BILL

 Foreperson.
