

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

deliver bulk cash in Caracas, Venezuela that was smuggled into the United States.

4. For example, in or about March 2019, ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendant, helped set up private flights between Turkey, Venezuela, and Russia 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.," the defendant, including a flight by EL AISSAMI MADDAH on or about February 23, 2019 from Vnukovo International Airport in Russia to Simón Bolívar International Airport in Venezuela, which was purportedly chartered by a Dominican Republic company associated with LEON MAAL and provided by a Turkish charter-flight-services firm.

The Foreign Narcotics Kingpin Designation Act

5. 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).

6. 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.

7. 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.

8. 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, 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. Conspiracies and attempts 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.

The Defendants and Related Entities

9. At all times relevant to this 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.," the defendant, was a Venezuelan citizen. EL AISSAMI MADDAH acted as the Vice President of Venezuela from in or about January 2017 up to and including in or about June 2018. In or about June 2018, EL AISSAMI MADDAH was named the Venezuelan Minister of Industry and National Production.

10. At all times relevant to this Indictment, SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendant, was 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.

11. According to filings with the U.S. Department of Homeland Security, SAMARK JOSE LOPEZ BELLO, a/k/a "Samark Lopez Delgado," a/k/a "Sierra Lima," the defendant, 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.

12. At all times relevant to this Indictment, Victor MONES CORO, a/k/a "Victor Mones," the defendant, was a naturalized U.S. citizen who was born in Venezuela, lived in Florida, and worked in the private-flight charter services industry.

13. At all times relevant to this Indictment, Alejandro MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendant, was a naturalized U.S. citizen who was born in Venezuela, lived in Florida, and worked in the private-flight charter services industry.

14. VICTOR MONES CORO, a/k/a "Victor Mones," the defendant, established American Charter Services LLC, among several other Florida companies. At various times between in or about 2008 and in or about 2019, ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendant, worked for American Charter Services LLC and one or more of its affiliates.

15. ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendant, established SVM I Solution, LLC, among several other Florida companies. "SVM I" is also the airport code for Simón Bolívar International Airport in Maiquetía, Venezuela.

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

16. 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.

17. 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."

STATUTORY ALLEGATIONS

18. 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.," 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," 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 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.

19. 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.," 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," 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.

20. 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.," 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," 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.

21. 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.," 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," 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, MONES CORO and LEON MAAL acting as agents of American Charter Services LLC and LEON MAAL acting as an agent of 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.

22. 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.," 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," 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, MONES CORO and LEON MAAL acting as agents of

American Charter Services LLC and LEON MAAL acting as 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, 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.

Overt Acts

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

a. On or about January 28, 2018, LEON MAAL used an email account associated with American Charter Services LLC to send a message related to private charter flights on board a U.S.-registered aircraft for, among others, relatives and associates of LOPEZ BELLO.

b. On or about July 27, 2018, LEON MAAL caused a transfer of approximately \$108,407.69 to be sent from an account

in Manhattan, New York to a U.S.-based account in the name of SVMI Solution LLC as partial compensation for private charter services provided to LOPEZ BELLO.

c. On or about September 6, 2018, MONES CORO used a U.S.-based bank account in the name of American Charter Services LLC to transfer approximately \$30,000 in connection with private charter services for LOPEZ BELLO.

d. On or about September 9, 2018, LOPEZ BELLO took a private flight on a U.S.-registered aircraft from the Dominican Republic to Venezuela that MONES CORO helped arrange.

e. On or about February 23, 2019, EL AISSAMI MADDAH took a private flight from Russia to Venezuela that LEON MAAL helped arrange.

(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 TWO

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

The Grand Jury further charges:

24. The allegations contained in paragraphs 1 through 17 and 23 of this Indictment are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

25. 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.," 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," the defendants, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly 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 -- MONES CORO and LEON MAAL acting as agents 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 THREE

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

The Grand Jury further charges:

26. The allegations contained in paragraphs 1 through 17 and 23 of this Indictment are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

27. 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.," 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," the defendants, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly 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 -- MONES CORO and LEON MAAL acting as agents 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 FOUR

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

The Grand Jury further charges:

28. The allegations contained in paragraphs 1 through 17 and 23 of this Indictment are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

29. 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.," 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," the defendants, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly 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, LEON MAAL acting as 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) 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 FIVE

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

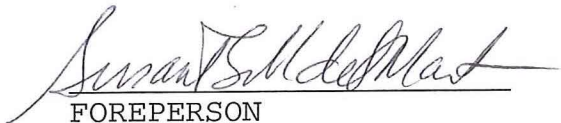
The Grand Jury further charges:


30. The allegations contained in paragraphs 1 through 17 and 23 of this Indictment are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

31. 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.," 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," the defendants, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly 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, LEON MAAL acting as an agent of SVM I 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.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SAMARK JOSE LOPEZ BELLO,
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VICTOR MONES CORO,
a/k/a "Victor Mones," and
ALEJANDRO MIGUEL LEON MAAL,
a/k/a "Alejandro Leon,"

Defendants.

SUPERSEDING INDICTMENT

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

GEOFFREY S. BERMAN
United States Attorney.

A TRUE BILL



Foreperson.
