

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

United States District Court  
For the District of Columbia

Grand Jury Sworn in on March 3, 2003

A TRUE COPY  
NANCY MAYER WHITTINGTON, Cler  
By [Signature]  
Deputy Clerk

UNITED STATES OF AMERICA

: CRIMINAL NO. 04-126

-v- **SEALED**

: GRAND JURY ORIGINAL

: FILED UNDER SEAL

: VIOLATIONS:

WILBER ALIRIO VARELA,  
a/k/a "Detergente,"  
a/k/a "Jabon,"

: 18 U.S.C. § 1962 (c)  
(RICO)

DIEGO LEON MONTOYA-SANCHEZ,  
LUIS HERNANDO GOMEZ-BUSTAMANTE,  
a/k/a "Rasguño,"

: 18 U.S.C. § 1962 (d)  
(RICO Conspiracy)

ARCANGEL HENAO-MONTOYA,  
a/k/a "El Mocho,"

: 21 U.S.C. § 963

JUAN CARLOS RAMIREZ-ABADIA,  
a/k/a "Chupeta,"

: (Conspiracy to Import Five

CARLOS ALBERTO RENTERIA-MANTILLA,  
a/k/a "Beto Renteria,"

: Kilograms or More of  
Cocaine and to Manufacture

GABRIEL PUERTA-PARRA,  
a/k/a "Doctor Puerta,"

: and Distribute Five  
Kilograms of More of Cocaine

JORGE ORLANDO RODRIGUEZ-ACERO,  
a/k/a "El Mono Ciguenta," and

: Intending and Knowing that  
the Cocaine Will Be

JAIRO APARICIO-LENIS,  
a/k/a "Don Pedro,"

: Unlawfully Imported into  
the United States)

: 18 U.S.C. § 1963 (a)

Defendants.

: 21 U.S.C. § 853

: (Forfeiture)

SULLIVAN, J. EGS

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

APR 29 2004

Racketeering Violation

The Grand Jury charges:

At all times relevant to this Indictment:

**SUPERSEDING**

The Enterprise

1. Orlando Henao-Montoya and Danilo Alfonso Gonzalez-Gil and WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," CARLOS ALBERTO RENTERIA-MANTILLA, a/k/a "Beto Renteria," GABRIEL PUERTA-PARRA, a/k/a "Doctor Puerta," and JORGE ORLANDO RODRIGUEZ-ACERO, a/k/a "El Mono Ciguenta," the defendants, and others known and unknown, were members of the Norte Valle Cartel (the "NVC"), a criminal organization whose members engaged in: (a) the illegal trafficking of cocaine; (b) the laundering of drug proceeds; (c) the bribing of Colombian law enforcement officials and Colombian politicians; and (d) the kidnaping, torture, and murder of informants, rival drug traffickers, and other perceived enemies of the NVC.

2. The NVC operated principally in the Norte de Valle del Cauca region of Colombia, the city of Cali, Colombia, and the Pacific Coast city of Buenaventura, Colombia, as well as Mexico and the United States. The NVC exported multi-ton loads of cocaine primarily from Colombia's Pacific Coast. The NVC worked with various Colombian transportation specialists to transport the cocaine from Peru, Colombia, and other locations within South America towards the Valle del Cauca region of Colombia. The NVC

then transported the cocaine by truck or airplane through the Valle del Cauca region to the Pacific Coast port city of Buenaventura. The NVC worked with various Mexican transportation groups and shipped cocaine loads to Mexico via go-fast boats, fishing vessels, and other maritime conveyances. Between 1990 and the present, the NVC exported more than 500,000 kilograms of cocaine worth more than \$10 billion from Colombia to Mexico and ultimately to the United States and became the most powerful cocaine-trafficking organization in Colombia.

3. The NVC used violence and brutality to further its goals. The NVC routinely murdered their rivals, individuals who failed to pay for drugs, and NVC members and associates whose loyalty was suspect. The NVC used the services of the Autodefensas Unidas de Colombia (the "AUC"), a terrorist paramilitary organization which is engaged in warfare with the Fuerzas Armadas Revolucionarios de Colombia (the "FARC"), Colombia's main guerilla group, to protect its drug routes, its drug laboratories, and its members and associates.

4. The NVC, including its leadership, membership, and associates, constituted an "Enterprise," as defined by Title 18, United States Code, Section 1961(4) (hereinafter "the Enterprise"), that is, a group of individuals associated in fact. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving

the objectives of the Enterprise. The Enterprise was engaged in, and its activities affected, interstate and foreign commerce.

The Members of the Enterprise

5. At various times relevant to this Indictment, the Defendants and other individuals listed below were members of the Enterprise and played the following roles, among others, in furthering the affairs of the Enterprise:

a. Orlando Henao-Montoya was the leader of the Enterprise until his murder on November 13, 1998 by a rival Colombian drug cartel. Until his death, Orlando Henao-Montoya had the ultimate decision-making authority over all major Enterprise decisions, including the organization and transportation of shipments of drugs from Colombia to Mexico and ultimately to the United States and enforcement activities undertaken by members of the Enterprise against rival drug traffickers, suspected informants, and other enemies of the Enterprise.

b. WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," and CARLOS ALBERTO RENTERIA-MANTILLA, a/k/a "Beto Renteria," the defendants, were at various times relevant to this Indictment narcotics traffickers and members of the Enterprise. The criminal

activities of VARELA, MONTOYA-SANCHEZ, GOMEZ-BUSTAMANTE, ARCANGEL HENAO-MONTOYA, RAMIREZ-ABADIA, and RENTERIA-MANTILLA included participation in conspiracies to do the following: (1) the illegal trafficking of cocaine; (2) the laundering of drug proceeds; (3) the bribing of Colombian law enforcement officials and Colombian politicians; and (4) the kidnaping, torture, and murder of informants, rival drug traffickers, and other perceived enemies of the Enterprise.

c. GABRIEL PUERTA-PARRA, a/k/a "Doctor Puerta," the defendant, was at various times relevant to this Indictment an attorney and counselor to the Enterprise. PUERTA-PARRA was responsible for (among other things) resolving internal disputes within the Enterprise and representing the interests of the members and associates of the Enterprise in disputes with other rival Colombian drug cartels. PUERTA-PARRA's criminal activities included participation in conspiracies to do the following: (1) the illegal trafficking of cocaine; (2) the laundering of drug proceeds; (3) the bribing of Colombian law enforcement and public officials; and (4) the kidnaping, torture, and murder of informants, rival drug traffickers, and other perceived enemies of the Enterprise.

d. Danilo Alfonso Gonzalez-Gil, until his murder on March 25, 2004, and JORGE ORLANDO RODRIGUEZ-ACERO, a/k/a "El Mono Ciguenta," the defendant, were at various times relevant to

this Indictment high-ranking officials with the Colombian National Police ("CNP") and members of the Enterprise who acted as enforcers by, in part, kidnaping and murdering individuals who posed a threat to the position, territory, and power of the Enterprise. Gonzalez-Gil and RODRIGUEZ-ACERO also used their influence within the CNP to protect other members and associates of the Enterprise and to protect the Enterprise's drug loads and drug routes from law enforcement scrutiny of their criminal activities. The criminal activities of Gonzalez-Gil and RODRIGUEZ-ACERO included participation in conspiracies to do the following: (1) the illegal trafficking of cocaine; (2) the laundering of drug proceeds; (3) the bribing of Colombian law enforcement and public officials; and (4) the kidnaping, torture, and murder of informants, rival drug traffickers, and other perceived enemies of the Enterprise.

e. JAIRO APARICIO-LENIS, a/k/a "Don Pedro," the defendant, was at various times relevant to this Indictment a member of the Enterprise responsible for laundering the Enterprise's cocaine proceeds.

#### Purposes of the Enterprise

6. The purposes of the Enterprise included the following:

a. Enriching members and associates of the Enterprise through the importation and distribution of illegal

drugs in Colombia, Mexico and the United States and the laundering of drug proceeds;

b. Preserving and protecting the Enterprise's control over the Colombian cocaine-trafficking business through the use of intimidation, threats of violence, and violence, including kidnaping, torture, and murder;

c. Keeping rival drug traffickers, suspected informants and witnesses, and other enemies of the Enterprise in fear of the Enterprise and in fear of its members and associates through threats of violence and violence; and

d. Promoting and enhancing the Enterprise and its members' and associates' activities.

Means and Methods of the Enterprise

7. Among the means and methods by which the defendants, their co-racketeers and other Enterprise members and associates conducted and participated in the conduct of the affairs of the Enterprise were the following:

a. Defendants, along with other members and associates of the Enterprise, acquired raw cocaine paste from individuals in Peru, Colombia, and other places in South America to be processed at laboratories within Colombia;

b. Defendants, along with other members and associates of the Enterprise, arranged for multi-ton quantities of processed cocaine to be transported from the laboratories

through the Norte de Valle del Cauca region of Colombia and ultimately to the Pacific Coast of Colombia, including the city of Buenaventura, Colombia;

c. Defendants, along with other members and associates of the Enterprise, pooled their multi-ton cocaine shipments from the Pacific Coast of Colombia and sent the drug loads on go-fast boats, fishing vessels, and other maritime conveyances to Mexico;

d. Defendants, along with other members and associates of the Enterprise, coordinated with Mexican transportation organizations to receive the pooled ton-quantity loads and send the drugs into the United States;

e. Defendants, along with other members and associates of the Enterprise, jointly arranged for the proceeds of their drug-trafficking activities in Mexico and the United States to be smuggled back into Colombia;

f. Defendants, along with other members and associates of the Enterprise, bribed Colombian law enforcement and other public officials to: (1) protect the Enterprise's leadership, members, and associates and their drug shipments; (2) inform Enterprise members and associates of Colombian and United States law enforcement activities; and (3) block efforts by the Colombian legislature to permit the extradition of Colombian



narcotics traffickers to the United States to face prosecution for their narcotics-trafficking crimes;

g. Defendants, along with other members and associates of the Enterprise, discussed Enterprise affairs and business in person and over communications equipment using various codes to disguise their identities and the meaning of their conversations;

h. Defendants, along with other members and associates of the Enterprise, conducted their own wiretaps to intercept the communications of rival drug traffickers and Colombian and United States law enforcement officials in order to monitor their activities and obtain information useful to the Enterprise;

i. Defendants, along with other members and associates of the Enterprise, organized and directed the kidnaping, torture, and murder of rival drug traffickers and suspected informants in Colombia; and

j. Defendants, along with other members and associates of the Enterprise, used the services of the AUC terrorist organization to protect their drug routes and drug laboratories.

#### The Racketeering Violation

8. From in or about 1990 up to and including the present, in the District of Columbia and elsewhere, Orlando

Henao-Montoya and Danilo Alfonso Gonzalez-Gil and WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," CARLOS ALBERTO RENTERIA-MANTILLA, a/k/a "Beto Renteria," GABRIEL PUERTA-PARRA, a/k/a "Doctor Puerta," and JORGE ORLANDO RODRIGUEZ-ACERO, a/k/a "El Mono Ciguenta," the defendants, and others known and unknown, being persons employed by and associated with the racketeering enterprise described in Paragraphs One through Seven above, namely, the Norte Valle Cartel, which enterprise was engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully, willfully, and knowingly conducted and participated, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), that is, through the commission of the following racketeering acts:

The Pattern of Racketeering

9. The pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisted of the following acts:

Racketeering Act One

(Conspiracy To Manufacture And Distribute Cocaine To Be Imported  
Into The United States)

10. From in or about 1990 up to and including the present, Orlando Henao-Montoya and Danilo Alfonso Gonzalez-Gil and WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," CARLOS ALBERTO RENTERIA-MANTILLA, a/k/a "Beto Renteria," GABRIEL PUERTA-PARRA, a/k/a "Doctor Puerta," and JORGE ORLANDO RODRIGUEZ-ACERO, a/k/a "El Mono Ciguenta," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly did combiné, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

11. It was a part and an object of said conspiracy that Orlando Henao-Montoya and Danilo Alfonso Gonzalez-Gil and WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," CARLOS ALBERTO RENTERIA-MANTILLA, a/k/a "Beto Renteria," GABRIEL PUERTA-PARRA, a/k/a "Doctor Puerta," and JORGE ORLANDO RODRIGUEZ-ACERO, a/k/a "El Mono Ciguenta," the defendants, and others known and unknown, would and did distribute a controlled substance, intending and

knowing that such substance would be imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 959(a) and 963.

12. It was a further part and an object of said conspiracy that Orlando Henao-Montoya and Danilo Alfonso Gonzalez-Gil and WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," CARLOS ALBERTO RENTERIA-MANTILLA, a/k/a "Beto Renteria," GABRIEL PUERTA-PARRA, a/k/a "Doctor Puerta," and JORGE ORLANDO RODRIGUEZ-ACERO, a/k/a "El Mono Ciguenta," the defendants, and others known and unknown, would and did import into the United States from a place outside thereof a controlled substance, to wit, five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Sections 812, 952(a), 960(b) (1) (A), and 963 of Title 21, United States Code.

**Racketeering Act Two**  
**(Conspiracy To Launder Cocaine Proceeds)**

13. From in or about 1990 up to and including the present, Orlando Henao-Montoya and Danilo Alfonso Gonzalez-Gil and WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a

"Rasguno," ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," CARLOS ALBERTO RENTERIA-MANTILLA, a/k/a "Beto Renteria," GABRIEL PUERTA-PARRA, a/k/a "Doctor Puerta," and JORGE ORLANDO RODRIGUEZ-ACERO, a/k/a "El Mono Ciquenta," the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Sections 1956(a)(1)(A)(i) and (B)(i) of Title 18, United States Code.

14. It was a part and an object of the conspiracy that Orlando Henao-Montoya and Danilo Alfonso Gonzalez-Gil and WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," CARLOS ALBERTO RENTERIA-MANTILLA, a/k/a "Beto Renteria," GABRIEL PUERTA-PARRA, a/k/a "Doctor Puerta," and JORGE ORLANDO RODRIGUEZ-ACERO, a/k/a "El Mono Ciquenta," 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, to wit, the transfer of millions of dollars of United States Currency, represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions which in fact

involved the proceeds of specified unlawful activity, to wit, the proceeds of illegal narcotics transactions, knowing that the transactions were designed in whole and in part (a) to promote the carrying on of specified unlawful activity, and (b) to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(i).

**Racketeering Act Three**

**(Conspiracy To Manufacture And Distribute Cocaine To Be Imported Into The United States)**

15. On or about April 24, 1993, DIEGO LEON MONTOYA-SANCHEZ, ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," and JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly did distribute a controlled substance, intending and knowing that such substance would be imported into the United States from a place outside thereof, which offense involved approximately 7,300 kilograms of cocaine, in violation of Title 21, United States Code, Section 959(a).

**Racketeering Act Four**

**(Conspiracy To Manufacture And Distribute Cocaine To Be Imported Into The United States)**

16. In or about 1997, Orlando Henao-Montoya and Danilo Alfonso Gonzalez-Gil and WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS

HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," and ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly did distribute a controlled substance, intending and knowing that such substance would be imported into the United States from a place outside thereof, which offense involved more than 10,000 kilograms of cocaine, in violation of Title 21, United States Code, Section 959(a).

**Racketeering Act Five**  
**(Conspiracy To Manufacture And Distribute Cocaine To Be Imported Into The United States)**

17. In or about May 2001, WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did distribute a controlled substance, intending and knowing that such substance would be imported into the United States from a place outside thereof, which offense involved approximately 13,000 kilograms of cocaine, in violation of Title 21, United States Code, Section 959(a).

In violation of Title 18, United States Code, Section 1962 (c).

COUNT TWO

Racketeering Conspiracy

The Grand Jury further charges:

18. Paragraphs One through Seven of this Indictment are realleged and incorporated by reference as though fully set forth herein.

19. From in or about 1990 up to and including the present, in the District of Columbia and elsewhere, Orlando Henao-Montoya and Danilo Alfonso Gonzalez-Gil and WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," CARLOS ALBERTO RENTERIA-MANTILLA, a/k/a "Beto Renteria," GABRIEL PUERTA-PARRA, a/k/a "Doctor Puerta," JORGE ORLANDO RODRIGUEZ-ACERO, a/k/a "El Mono Ciquenta," and JAIRO APARICIO-LENIS, a/k/a "Don Pedro," the defendants, and others known and unknown, being persons employed by and associated with the racketeering enterprise described in Paragraphs One through Four above, namely, the Norte Valle Cartel, which enterprise was engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully, willfully, and knowingly combined, conspired, confederated, and agreed together and with each other to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, as that



term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of multiple acts indictable under the following provisions of federal law:

a. Title 21, United States Code, Section 952(a) and 959 (manufacture and distribution of cocaine to be imported into the United States).

b. Title 18, United States Code, Sections 1956 and 1957 (money laundering).

20. It was a further part of the conspiracy that each defendant agreed that a co-conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

#### OVERT ACTS

21. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in Colombia and elsewhere:

#### THE ENTERPRISE'S VIOLENCE

a. In or about 1994, Orlando Henao-Montoya and WILBER ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," and JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," the defendants, and others known and unknown, conspired to murder and murdered members of the "Los Burros" in Colombia based on their suspicion that the "Los Burros," who worked for the Enterprise providing

security for cocaine laboratories, were plotting to kidnap and kill the leadership of the Enterprise.

b. In or about 1996, Orlando Henao-Montoya and Danilo Alfonso Gonzalez-Gil and WILBER ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," the defendant, and others known and unknown, conspired to murder and murdered Jose Santacruz, a/k/a "Chepe Santacruz," one of the leaders of the rival Cali Cartel, in Colombia.

c. In or about 1996, Orlando Henao-Montoya, and WILBER ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," the defendant, and others known and unknown, conspired to murder William Rodriguez-Abadia, the son of Cali Cartel leader Miguel Rodriguez-Orejuela, in Colombia.

d. On or about November 5, 1998, Orlando Henao-Montoya and Danilo Alfonso Gonzalez-Gil and WILBER ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," the defendant, and others known and unknown, conspired to murder and murdered Helmer Herrera, a/k/a "Pacho Herrera," one of the leaders of the rival Cali Cartel, in Colombia.

e. On or about January 5, 2003, WILBER ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," and ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," the defendants, and others known and unknown, conspired to murder and murdered Miguel Solano-Duran, a member of the Norte Valle Cartel, outside a nightclub in Cartagena,

Colombia based on their mutual suspicion that Solano-Duran was working as an informant for the United States Drug Enforcement Administration ("DEA").

f. In or about January 2004, JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," the defendant, shot and killed Luis Alfonse Ocampo-Fomeque, a/k/a "Tocayo Patino," a member of the Norte Valle Cartel, in Cali, Colombia based on his suspicion that Ocampo-Fomeque was working as an informant for the DEA. After the murder, co-conspirators of the Enterprise not named as defendants herein dismembered Ocampo-Fomeque's body.

**THE ENTERPRISE'S BRIBERY OF COLOMBIAN OFFICIALS**

g. Between in or about 1996 and in or about 1999, members of the Enterprise, including GABRIEL PUERTA-PARRA, a/k/a "Doctor Puerta," and others known and unknown, attempted to bribe Colombian legislators to block the passage of a law permitting the extradition of Colombian narcotics traffickers to the United States to face prosecution for their narcotics-trafficking crimes.

h. In or about 2000 or 2001, WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," CARLOS ALBERTO RENTERIA-MANTILLA, a/k/a "Beto Renteria," the defendants, and Danilo Alfonso Gonzalez-Gil, and others known and unknown, attempted to bribe Colombian

legislators to make it more difficult to extradite Colombian narcotics traffickers to the United States to face prosecution for their narcotics-trafficking crimes.

**SELECTED COCAINE SHIPMENTS SEIZED FROM THE ENTERPRISE**

i. On or about April 24, 1993, co-conspirators of the Enterprise not named as defendants herein possessed approximately 7,200 kilograms of cocaine in Mexico that was seized by law enforcement authorities.

j. On or about April 18, 1998 and May 29, 1998, co-conspirators of the Enterprise not named as defendants herein possessed approximately 1,000 kilograms of cocaine in Mexico that were seized by law enforcement authorities.

k. On or about June 18, 1998, September 8, 1998, October 23, 1998, and November 25, 1998, co-conspirators of the Enterprise not named as defendants herein possessed approximately 1,900 kilograms of cocaine in various locations throughout the United States that were seized by law enforcement authorities.

l. On or about September 26, 1998, co-conspirators of the Enterprise not named as defendants herein possessed approximately 445 kilograms of cocaine in Buenaventura, Colombia that were seized by law enforcement authorities.

m. On or about May 3, 2001, co-conspirators of the Enterprise not named as defendants herein possessed approximately 13,000 kilograms of cocaine on the vessel Svesda

Maru in the Pacific Ocean that were seized by law enforcement authorities.

In violation of Title 18, United States Code, Section 1962(d).

COUNT THREE

The Grand Jury further charges:

22. From in or about 1990 up to and including the present, Orlando Henao-Montoya and Danilo Alfonso Gonzalez-Gil and WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," CARLOS ALBERTO RENTERIA-MANTILLA, a/k/a "Beto Renteria," GABRIEL PUERTA-PARRA, a/k/a "Doctor Puerta," JORGE ORLANDO RODRIGUEZ-ACERO, a/k/a "El Mono Ciquenta," and JAIRO APARICIO-LENIS, a/k/a "Don Pedro," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

23. It was a part and an object of said conspiracy that Orlando Henao-Montoya and Danilo Alfonso Gonzalez-Gil and WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," CARLOS ALBERTO RENTERIA-

MANTILLA, a/k/a "Beto Renteria," GABRIEL PUERTA-PARRA, a/k/a "Doctor Puerta," JORGE ORLANDO RODRIGUEZ-ACERO, a/k/a "El Mono Ciguenta," and JAIRO APARICIO-LENIS, a/k/a "Don Pedro," the defendants, and others known and unknown, would and did distribute a controlled substance, intending and knowing that such substance would be imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 959(a).

In violation of Title 21, United States Code, Sections 963, 959(c), 960(a)(3) and 960(b)(1)(B)(ii).

**FORFEITURE ALLEGATION AS TO COUNTS ONE AND TWO**

24. The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1963.

25. Through the aforesaid racketeering activity, WILBUR ALIRIO VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno," ARCANGEL HENAO-MONTOYA, a/k/a "El Mochó," JUAN CARLOS RAMIREZ-ABADIA, a/k/a "Chupeta," CARLOS ALBERTO RENTERIA-MANTILLA, a/k/a "Beto Renteria," GABRIEL PUERTA-PARRA, a/k/a "Doctor Puerta," JORGE ORLANDO RODRIGUEZ-ACERO, a/k/a "El Mono Ciguenta," and JAIRO APARICIO-LENIS, a/k/a "Don Pedro," the defendants, have interests they have acquired and maintained in

violation of Title 18, United States Code, Section 1962, and property constituting, and derived from, proceeds which they obtained, directly and indirectly, from racketeering activity in violation of Title 18, United States Code, Section 1962, thereby making such property, or an amount of cash equivalent thereto, forfeitable to the United States of America pursuant to Title 18, United States Code, Sections 1963(a)(1) and (a)(3). The intent of the United States of America to forfeit such property includes, but is not limited to, the sum of \$10 billion in United States Currency. Said defendants are jointly and severally liable to the United States for this amount.

Substitute Assets Provision

26. If any of the property described above as being subject to forfeiture, 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 party;
- 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 divided  
without difficulty;

it is the intention of the United States, pursuant to Title 18,  
United States Code, Section 1963(m), to seek forfeiture of any  
other property of the defendants up to the value of the  
forfeitable property.

In violation of Title 18, United States Code, Section  
1963(a).

**FORFEITURE ALLEGATION AS TO COUNT THREE**

27. As a result of committing the controlled substance  
offense alleged in Count Three of this Indictment, WILBUR ALIRIO  
VARELA, a/k/a "Detergente," a/k/a "Jabon," DIEGO LEON MONTOYA-  
SANCHEZ, LUIS HERNANDO GOMEZ-BUSTAMANTE, a/k/a "Rasguno,"  
ARCANGEL HENAO-MONTOYA, a/k/a "El Mocho," JUAN CARLOS RAMIREZ-  
ABADIA, a/k/a "Chupeta," CARLOS ALBERTO RENTERIA-MANTILLA, a/k/a  
"Beto Renteria," GABRIEL PUERTA-PARRA, a/k/a "Doctor Puerta,"  
JORGE ORLANDO RODRIGUEZ-ACERO, a/k/a "El Mono Ciquenta," and  
JAIRO APARICIO-LENIS, a/k/a "Don Pedro," the defendants, shall  
forfeit to the United States, pursuant to Title 21, United States  
Code, Section 853, any and all property constituting and derived  
from any proceeds that the said defendants obtained directly and  
indirectly as a result of the said violation and any and all  
property used and intended to be used in any manner or part to  
commit and to facilitate the commission of the violation alleged



in Count Three of this Indictment, including, but not limited to, the following:

a. A sum of money equal to approximately \$10 billion in United States Currency, representing the amount of proceeds obtained as a result of the controlled substance offenses for which the defendants are jointly and severally liable.

Substitute Assets Provision

28. If any of the property described above as being subject to forfeiture, 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 party;
- 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 divided without difficulty;

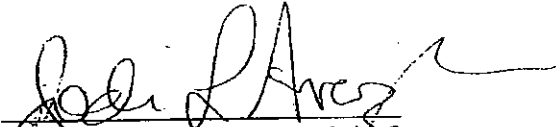
it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of the defendants up to the value of the  
forfeitable property.

In violation of Title 21, United States Code, Sections 959  
and 853.

A TRUE BILL:

  
FOREPERSON.

  
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Narcotics and Dangerous Drug Section  
Criminal Division  
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