

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA,)	
)	<u>UNDER SEAL</u>
v.)	(L.R. 49(B))
)	
DAMASO LOPEZ NUÑEZ,)	Case No. 1:11CR558
also known as)	
“El Licenciado,”)	<u>Count 1:</u> 21 U.S.C. §§ 959, 960, 963
)	(conspiracy to distribute five
FELIPE ZURITA-CRUZ,)	kilograms or more of cocaine
also known as)	for importation into the
“Daniel Garcia Cordero,”)	United States)
)	
FNU LNU,)	<u>Count 2:</u> 18 U.S.C. §§ 1956(h), 3238
also known as)	(conspiracy to commit money laundering)
“El Gordo,”)	
)	Forfeiture: 21 U.S.C. § 853
JAIME ALBERTO LOPEZ GUTIERREZ,)	21 U.S.C. § 970
)	18 U.S.C. § 982
and)	
)	
RAUL ROSALES SAENZ,)	
)	
Defendants.)	

November 2011 Term - at Alexandria, Virginia

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From in or about 2007 and continuing thereafter, up to and including the date of the filing of this Indictment, in the countries of Mexico, Peru, Panama, and the United States, and elsewhere, the defendants, DAMASO LOPEZ NUÑEZ, a.k.a “El Licenciado,” FELIPE ZURITA-CRUZ, a.k.a. “Daniel Garcia Cordero,” FNU LNU, a.k.a. “El Gordo,” JAIME ALBERTO LOPEZ GUTIERREZ, and RAUL ROSALES SAENZ, did unlawfully, knowingly, and intentionally combine, conspire,

confederate, and agree with each other and with other persons both known and unknown to the grand jury, to distribute a controlled substance, knowing and intending that said controlled substance would be unlawfully imported into the United States from a place outside thereof, which offense involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 959(a) and 960.

(All in violation of Title 21, United States Code, Section 963.)

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From in or about 2007 and continuing thereafter, up to and including the date of the filing of this Indictment, within the jurisdiction of the United States and in an offense begun and committed outside the jurisdiction of a particular State or district, the defendants, DAMASO LOPEZ NUÑEZ, a.k.a "El Licenciado," FELIPE ZURITA-CRUZ, a.k.a. "Daniel Garcia Cordero," FNU LNU, a.k.a. "El Gordo," JAIME ALBERTO LOPEZ GUTIERREZ, and RAUL ROSALES SAENZ, did knowingly and intentionally combine, conspire, confederate, and agree with each other and with other persons both known and unknown to the grand jury, to unlawfully and knowingly transport, transmit, and transfer monetary instruments and funds from a place in the United States to a place outside the United States and to a place in the United States from or through a place outside the United States with the intent to promote the carrying on of a specified unlawful activity, to wit: narcotics trafficking, in violation of Title 18, United States Code, Section 1956(a)(2)(A), and Title 18, United States Code, Section 3238.

(All in violation of Title 18, United States Code, Section 1956(h).)

FORFEITURE

Pursuant to Rule 32.2(a), the defendants are hereby notified that, if convicted of Count One or Two of this indictment, they shall forfeit to the United States any property constituting or derived from any proceeds the defendants and their co-conspirators obtained, directly or indirectly, as the result of such violation, or substitute assets therefor, up to and including a sum of money equal to \$280,000,000 in United States currency, representing the proceeds of the offense, and any of the defendants' property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation.

(Pursuant to Title 21, United States Code, Sections 853, 970; Title 18, United States Code, Section 982; Title 28, United States Code, Section 2461(c); and Rule 32.2(a) of the Federal Rules of Criminal Procedure.)

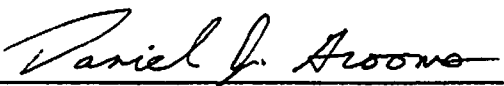
A TRUE BILL.

~~Pursuant to the E-Government Act,~~
the original of this page has been filed
under seal at the Clerk's Office.

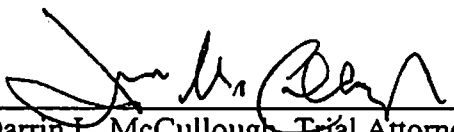
Foreperson

Neil H. MacBride
United States Attorney
Eastern District of Virginia
U.S. Department of Justice

Arthur G. Wyatt, Chief
Narcotic and Dangerous Drug Section
Criminal Division
U.S. Department of Justice



Daniel J. Grooms
Assistant United States Attorney
Eastern District of Virginia



Darrin L. McCullough, Trial Attorney
Narcotic and Dangerous Drug Section
Criminal Division