

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
 :
 - v. - :
 :
 SEUXIS PAUCIS HERNANDEZ-SOLARTE, : 18 Cr.
 a/k/a "Jesus Santrich," :
 MARLON MARIN, :
 ARMANDO GOMEZ, :
 a/k/a "El Doctor," and :
 FABIO SIMON YOUNES ARBOLEDA, :
 :
 Defendants. :
 :
----- X

SEALED INDICTMENT

18 CRIM 262

COUNT ONE
(Cocaine Importation Conspiracy)

The Grand Jury charges:

OVERVIEW

1. From at least in or about June 2017, up to and including in or about April 2018, SEUXIS PAUCIS HERNANDEZ-SOLARTE, a/k/a "Jesus Santrich," MARLON MARIN, ARMANDO GOMEZ, a/k/a "El Doctor," and FABIO SIMON YOUNES ARBOLEDA, the defendants, worked together to produce and distribute approximately 10,000 kilograms of cocaine from Colombia to the United States and elsewhere.

2. At all times relevant to this Indictment, SEUXIS PAUCIS HERNANDEZ-SOLARTE, a/k/a "Jesus Santrich," MARLON MARIN, ARMANDO GOMEZ, a/k/a "El Doctor," and FABIO SIMON YOUNES ARBOLEDA,

the defendants, were members and associates of the Fuerzas Armadas Revolucionarias de Colombia, or, translated into English, the Revolutionary Armed Forces of Colombia (the "FARC"). For example, HERNANDEZ-SOLARTE was a high-ranking member of the FARC leadership and currently is a candidate to be seated in the Colombia Camara de Representates, or, translated into English, the House of Representatives.

3. During the course of their cocaine trafficking, HERNANDEZ-SOLARTE, MARIN, GOMEZ, and YOUNES ARBOLEDA represented that they had access to laboratories to supply the cocaine and to U.S.-registered airplanes to transport the drugs within and through Colombia, and they provided kilograms of cocaine to others as, among other things, evidence of their access to ton quantities of cocaine.

STATUTORY ALLEGATIONS

4. From at least in or about June 2017, up to and including in or about April 2018, in Colombia and elsewhere, in an offense begun and committed outside of the jurisdiction of any particular State or district of the United States, SEUXIS PAUCIS HERNANDEZ-SOLARTE, a/k/a "Jesus Santrich," MARLON MARIN, ARMANDO GOMEZ, a/k/a "El Doctor," and FABIO SIMON YOUNES ARBOLEDA, the defendants, who will be first brought to and arrested in the Southern District of New York, and others known and unknown,

intentionally and knowingly combined, conspired, confederated and agreed together and with each other to violate the narcotics laws of the United States.

5. It was a part and an object of the conspiracy that SEUXIS PAUCIS HERNANDEZ-SOLARTE, a/k/a "Jesus Santrich," MARLON MARIN, ARMANDO GOMEZ, a/k/a "El Doctor," and FABIO SIMON YOUNES ARBOLEDA, the defendants, and others known and unknown, would and did knowingly and intentionally import into the United States and into the customs territory of the United States from a place outside thereof a controlled substance, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

6. It was further a part and an object of the conspiracy that SEUXIS PAUCIS HERNANDEZ-SOLARTE, a/k/a "Jesus Santrich," MARLON MARIN, ARMANDO GOMEZ, a/k/a "El Doctor," and FABIO SIMON YOUNES ARBOLEDA, the defendants, and others known and unknown, would and did manufacture and distribute a controlled substance intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

7. It was further a part and an object of the conspiracy that SEUXIS PAUCIS HERNANDEZ-SOLARTE, a/k/a "Jesus Santrich," MARLON MARIN, ARMANDO GOMEZ, a/k/a "El Doctor," and FABIO SIMON YOUNES ARBOLEDA, the defendants, and others known and unknown, would and did, on board an aircraft registered in the United States, manufacture and distribute a controlled substance, and possess a controlled substance with intent to distribute, in violation of Title 21, United States Code, Sections 959(c) and 960(a)(3).

8. The controlled substance involved in the offense was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 960(b)(1)(B).

(Title 21, United States Code, Sections 959 and 963; and Title 18, United States Code, Section 3238.)

COUNT TWO
(Cocaine Importation Attempt)

The Grand Jury further charges:

9. The allegations contained in paragraphs 1 through 3 of this Indictment are hereby repeated, realleged, and incorporated by reference as if fully set forth here.

10. From at least in or about June 2017, up to and including in or about April 2018, in Colombia and elsewhere, in an offense begun and committed outside of the jurisdiction of any

particular State or district of the United States, SEUXIS PAUCIS HERNANDEZ-SOLARTE, a/k/a "Jesus Santrich," MARLON MARIN, ARMANDO GOMEZ, a/k/a "El Doctor," and FABIO SIMON YOUNES ARBOLEDA, the defendants, who will be first brought to and arrested in the Southern District of New York, and others known and unknown, intentionally and knowingly attempted to manufacture and distribute a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 959(a) and 963.

11. The controlled substance involved in the offense was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 812, 960(a)(3), and 960(b)(1)(B).

(Title 21, United States Code, Sections 959 and 963; Title 18, United States Code, Section 3238.)

COUNT THREE
(Cocaine Importation Attempt)

The Grand Jury further charges:

12. The allegations contained in paragraphs 1 through 3 of this Indictment are hereby repeated, realleged, and incorporated by reference as if fully set forth here.

13. From at least in or about June 2017, up to and including in or about April 2018, in Colombia and elsewhere, in an offense begun and committed outside of the jurisdiction of any particular State or district of the United States, SEUXIS PAUCIS HERNANDEZ-SOLARTE, a/k/a "Jesus Santrich," MARLON MARIN, ARMANDO GOMEZ, a/k/a "El Doctor," and FABIO SIMON YOUNES ARBOLEDA, the defendants, who will be first brought to and arrested in the Southern District of New York, and others known and unknown, intentionally and knowingly attempted to import into the United States and into the customs territory of the United States from a place outside thereof a controlled substance, in violation of Title 21, United States Code, Sections 952, 960 and 963.

14. The controlled substance involved in the offense was five kilograms and more of mixtures and substances containing

a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 812, 960(a)(1), and 960(b)(1)(B).

(Title 21, United States Code, Sections 959 and 963; Title 18, United States Code, Section 3238.)

FORFEITURE ALLEGATION

15. As a result of committing the controlled substance offenses charged in Counts One, Two, and Three of this Indictment, SEUXIS PAUCIS HERNANDEZ-SOLARTE, a/k/a "Jesus Santrich," MARLON MARIN, ARMANDO GOMEZ, a/k/a "El Doctor," and FABIO SIMON YOUNES ARBOLEDA, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses, and any and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendants personally obtained.

Substitute Assets Provision

16. If any of the above-described forfeitable property, as a result of any act or omission of SEUXIS PAUCIS HERNANDEZ-


SOLARTE, a/k/a "Jesus Santrich," MARLON MARIN, ARMANDO GOMEZ, a/k/a "El Doctor," and FABIO SIMON YOUNES ARBOLEDA, 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, Sections 853(p) and 970, to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 853 & 970.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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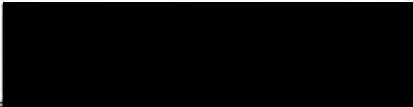
INDICTMENT

18 Cr.

(21 U.S.C. §§ 952, 959 & 963;
18 U.S.C. §§ 3238 & 2)

GEOFFREY S. BERMAN
United States Attorney.

A TRUE BILL

 Foreperson.
