

FILED

MAY 23 2013

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Holding a Criminal Term

Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia

UNSEALED

Grand Jury Sworn in on November 9, 2012

Case: 1:12-cr-00266
Assigned To : Roberts, Richard W
Assign. Date : 12/12/2012

UNITED STATES OF AMERICA :

CRIMINAL NO

v. :

VIOLATIONS:

SERGIO GONZALEZ-BENCOMO (1) :

a.k.a. "Juan Manuel Rivas," :

a.k.a. "Mane," :

a.k.a. "Manny," :

a.k.a. "Cuba," :



18 U.S.C. § 2

(Aiding and Abetting)

ORAL GEORGE THOMPSON (3), :

a.k.a. "Chad," :

21 U.S.C. § 853

21 U.S.C. § 970

(Forfeiture)

DARIO DAVIS (4), :

a.k.a. "D," and :

FILED IN OPEN COURT

TREVOR FERGUSON (5), :

a.k.a. "Shub," :

a.k.a. "Shubba," :

a.k.a. "730," :

DEC 12 2012

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

Defendants. :

**Redacted
INDICTMENT**

THE GRAND JURY CHARGES THAT:

COUNT ONE

From in or about May 2011, and continuing thereafter up to and including the date of the filing of this Indictment, the exact dates being unknown to the Grand Jury, in the Bahamas,

Colombia, Haiti, Honduras, Venezuela, the Dominican Republic, and elsewhere, the Defendants SERGIO GONZALEZ-BENCOMO, a.k.a. "Juan Manuel Rivas," a.k.a. "Mane," a.k.a. "Manny," a.k.a. "Cuba," [REDACTED] ORAL GEORGE THOMPSON, a.k.a. "Chad," DARIO DAVIS, a.k.a. "D," TREVOR FERGUSON, a.k.a. "Shub," a.k.a. "Shubba," a.k.a. "730," and others known and unknown to the Grand Jury, did knowingly, wilfully, and intentionally combine, conspire, confederate, and agree to commit the following offense against the United States: to knowingly and intentionally, on board an aircraft registered in the United States or owned by a United States citizen, distribute, and possess with intent to distribute, five 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(b) and 960(b)(1)(B); all in violation of Title 21, United States Code, Section 963, and Title 18, United States Code, Section 2.

(Conspiracy to Distribute, and Possess with Intent to Distribute, Five Kilograms or More of Cocaine On Board an Aircraft Registered in the United States or Owned by a United States Citizen, in violation of Title 21, United States Code, Sections 959(b), 960, and 963, and Title 18, United States Code, Section 2)

FORFEITURE ALLEGATION

Upon conviction of the criminal violation alleged in Count One, defendants SERGIO GONZALEZ-BENCOMO, a.k.a. "Juan Manuel Rivas," a.k.a. "Mane," a.k.a. "Manny," a.k.a. "Cuba," [REDACTED] ORAL GEORGE THOMPSON, a.k.a. "Chad," DARIO DAVIS, a.k.a. "D," TREVOR FERGUSON, a.k.a. "Shub," a.k.a. "Shubba," a.k.a. "730,":

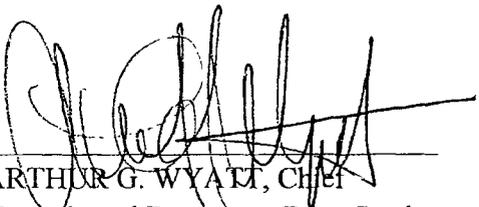
- (1) Shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all respective right, title or interest which such defendants may have in:
 - (a) any and all money and/or property constituting, or derived from, any proceeds which such defendants obtained, directly or indirectly, as the result of the violation alleged in Count One of this Indictment; and
 - (b) any and all property used, in any manner or part, to commit, or to facilitate the commission of, the violation alleged in Count One of this Indictment.

- (2) If any of said 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 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 subdivided 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 said property. Criminal Forfeiture, in violation of Title 21, United States Code, Sections 853 and 970.

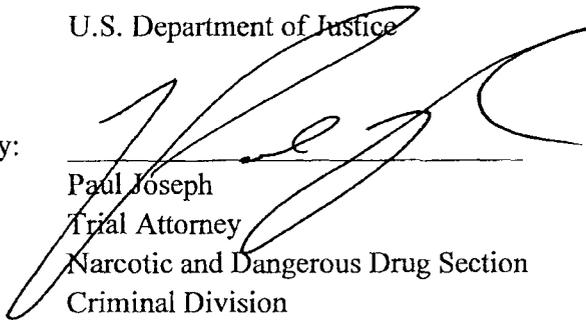
A TRUE BILL:

FOREPERSON



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

By:



Paul Joseph
Trial Attorney
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U.S. District and Bankruptcy Court
for the District of Columbia
A TRUE COPY
ANGELA D. CAESAR, Clerk

By Mark Coates 12-13-12
Deputy Clerk