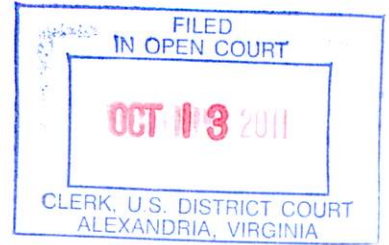


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)	(UNDER SEAL)
)	
v.)	CRIMINAL NO. 1:11-CR-334
)	
ALEJANDRO LOPEZ,)	Count 1 - 21 U.S.C. §§ 959(a), 960, 963
aka Angel,)	(Conspiracy to Distribute Five
)	Kilograms or More of Cocaine
and)	Knowing and Intending that it
)	will be Unlawfully Imported
AYMAN JOUMAA,)	into the United States)
)	
Defendants.)	Count 2 - 18 U.S.C. § 1956(h)
)	(Conspiracy to Commit Money
)	Laundering)
)	
)	Forfeiture - 18 USC § 853, 970
)	(Criminal Forfeiture)

SUPERSEDING INDICTMENT

OCTOBER 2011 TERM - at Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Distribute Five Kilograms or More of Cocaine Knowing and Intending that it would be Unlawfully Imported into the United States)

From in or about 2004 and continuing thereafter up to on or about September 17, 2011, the exact dates being unknown to the Grand Jury, in Colombia, Lebanon, Panama, and elsewhere, the defendant, ALEJANDRO LOPEZ, aka Angel, AYMAN JOUMAA, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree to commit the following offense against the United States: to knowingly and intentionally distribute five kilograms or more of a mixture and substance containing a

detectable amount of cocaine, a Schedule II controlled substance, knowing and intending that such substance would be unlawfully imported into the United States, in violation of Title 21, United States Code, Section 959(a).

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

COUNT 2

(Conspiracy to Commit Money Laundering)

From in or about 2004 and continuing thereafter through on or about September 17, 2011, in Colombia, Lebanon, Panama, and elsewhere, the defendant, ALEJANDRO LOPEZ, aka Angel, AYMAN JOUMAA, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree to conduct financial transactions involving the proceeds of a specified unlawful activity, to wit, the manufacture, importation, sale, and distribution of a controlled substance, which financial transactions involving interstate and international commerce were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of a specified unlawful activity, to wit, the manufacture, importation, sale, and distribution of a controlled substance, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and (h)).

FORFEITURE NOTICE

Each defendant, if convicted of the violation alleged in Count 1 of this Indictment, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a), any property constituting, or derived from, any proceeds each defendant obtained, directly or indirectly, as the result of such violation; 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. This property includes, but is not limited to \$5,000,000 in United States currency, representing proceeds that the defendant obtained in the course of the conspiracy alleged in Count 1 of this Indictment.

If convicted of the money laundering conspiracy charged in Count 2 of this Indictment, each defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property, including but not limited to \$5,000,000 in United States currency, representing proceeds that the defendant obtained in the course of the conspiracy alleged in Count 2 of this Indictment.

(Pursuant to Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982(a)(1)).

A TRUE BILL

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

Foreperson

Neil H. MacBride
United States Attorney

By:



Michael P. Ben' Ary
Assistant United States Attorney