

Approved: Amanda L Houle  
Amanda L. Houle / Matthew J. Laroche  
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Assistant United States Attorneys

Before: HONORABLE ROBERT W. LEHRBURGER  
United States Magistrate Judge  
Southern District of New York

20 MAG 4462

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 UNITED STATES OF AMERICA : COMPLAINT  
 :  
 - v. - : Violations of  
 : 18 U.S.C. §§ 924, 2;  
 JUAN CARLOS BONILLA VALLADARES, : 21 U.S.C. § 963  
 a/k/a "El Tigre," :  
 :  
 Defendant. : COUNTY OF OFFENSE:  
 : NEW YORK  
 - - - - - x

SOUTHERN DISTRICT OF NEW YORK, ss.:

BRIAN J. FAIRBANKS, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration ("DEA") and charges as follows:

COUNT ONE  
(Cocaine Importation Conspiracy)

1. From at least in or about 2003 up to and including in or about 2018, in Honduras and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or district of the United States, JUAN CARLOS BONILLA VALLADARES, a/k/a "El Tigre," the defendant, and others known and unknown, at least one of whom has been first brought to and arrested in the Southern District of New York, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JUAN CARLOS BONILLA VALLADARES, a/k/a "El Tigre," the defendant, and others known and unknown, would and did 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).

3. It was further a part and an object of the conspiracy that JUAN CARLOS BONILLA VALLADARES, a/k/a "El Tigre," the defendant, and others known and unknown, would and did manufacture, distribute, and possess with intent to 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, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

4. It was further a part and an object of the conspiracy that JUAN CARLOS BONILLA VALLADARES, a/k/a "El Tigre," the defendant, and others known and unknown, would and did, on board an aircraft registered in the United States, manufacture, distribute, and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 959(c) and 960(a)(3).

5. The controlled substance that JUAN CARLOS BONILLA VALLADARES, a/k/a "El Tigre," the defendant, conspired to (i) import into the United States and into the customs territory of the United States from a place outside thereof, (ii) manufacture and distribute, 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, and (iii) manufacture, distribute, and possess on board an aircraft registered in the United States, 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, Section 963; and  
Title 18, United States Code, Section 3238.)

COUNT TWO

(Possession of Machineguns and Destructive Devices)

6. From in or about 2003 up to and including in or about 2018, in Honduras and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or district of the United States and for which one of two or more joint offenders has been first brought to and arrested in the Southern District of New York, JUAN CARLOS BONILLA VALLADARES, a/k/a "El Tigre," the defendant, during and in relation to a drug

trafficking crime for which he may be prosecuted in a court of the United States, to wit, the narcotics importation conspiracy charged in Count One of this Complaint, knowingly used and carried firearms, and, in furtherance of such crime, knowingly possessed firearms, and aided and abetted the use, carrying, and possession of firearms, to wit, machineguns that were capable of automatically shooting more than one shot, without manual reloading, by a single function of the trigger, as well as destructive devices.

(Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(B)(ii), 3238, and 2.)

COUNT THREE

(Conspiracy to Possess Machineguns and Destructive Devices)

7. From in or about 2003 up to and including in or about 2018, in Honduras and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or district of the United States, JUAN CARLOS BONILLA VALLADARES, a/k/a "El Tigre," the defendant, and others known and unknown, at least one of whom has been first brought to and arrested in the Southern District of New York, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate Title 18, United States Code, Section 924(c).

8. It was a part and object of the conspiracy that JUAN CARLOS BONILLA VALLADARES, a/k/a "El Tigre," the defendant, and others known and unknown, would and did, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit, the narcotics importation conspiracy charged in Count One of this Complaint, would and did use and carry firearms, and, in furtherance of such drug trafficking crime, knowingly possess firearms, including machineguns that were capable of automatically shooting more than one shot, without manual reloading, by a single function of the trigger, as well as destructive devices, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 924(c)(1)(B)(ii).

(Title 18, United States Code, Sections 924(o) and 3238.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

9. I am a Special Agent with the DEA. This affidavit is based upon my conversations with law enforcement officers and employees, my conversations with the cooperating witnesses described herein, as well as a review of documents, during the

course of the investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of the investigation. Where the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

10. Based on my review of documents and my conversations with other law enforcement officers as well as cooperating witnesses, I have learned the following, in substance and in part:

a. From at least in or about 2003, up to and including in or about 2020, multiple drug-trafficking organizations in Honduras and elsewhere worked together, and with support from certain prominent public and private individuals, including Honduran politicians and law enforcement officials, to receive multi-ton loads of cocaine sent to Honduras from, among other places, Colombia and Venezuela, via air and maritime routes, and to transport the drugs westward in Honduras toward the border with Guatemala and eventually to the United States.

b. For protection from law enforcement interference, and in order to facilitate the safe passage through Honduras of multi-ton loads of cocaine, drug traffickers paid bribes to public officials, including certain members of the National Congress of Honduras and the Honduran National Police, of which JUAN CARLOS BONILLA VALLADARES, a/k/a "El Tigre," the defendant, was a member.

c. BONILLA VALLADARES was a member of the Honduran National Police from at least in or about 1985 up to and including at least in or about 2016. During that time, he held high-ranking positions, including Regional Police Chief and, from in or about 2012 up to and including in or about 2013, Chief of Police for all of Honduras. BONILLA VALLADARES corruptly exploited these official positions to facilitate cocaine trafficking and used violence, including murder, to protect the particular cell of politically connected drug traffickers he aligned with, including Juan Antonio Hernandez Alvarado, a former Honduran congressman and the brother of the president of Honduras, who is himself referred to below as "CC-4."<sup>1</sup>

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<sup>1</sup> In October 2019, Hernandez Alvarado was convicted at trial in this District of participating in a cocaine-importation

11. Based on my review of documents and my conversations with other law enforcement officers and a cooperating witness ("CW-1"),<sup>2</sup> I have learned the following, in substance and in part, with respect to CW-1:

a. From in or about 2010 up to and including in or about 2018, Hernandez Alvarado and CW-1 worked together to manufacture and distribute approximately 40 tons of cocaine destined for the United States. CW-1 and Hernandez Alvarado used planes, boats, U.S.-registered helicopters, and various vehicles to transport cocaine. Essential to Hernandez Alvarado and CW-1's drug-trafficking operation was their ability to transport cocaine throughout Honduras to the Guatemalan border, where it was then transported through Guatemala and Mexico toward its ultimate destination in the United States.

b. In or about 2011, a rival Honduran drug trafficker not named as a defendant herein ("Victim-1") attempted to prevent Hernandez Alvarado and CW-1 from transiting cocaine shipments toward the Guatemalan border through Santa Rita, Copán, a municipality in Honduras. When CW-1 reported this issue to Hernandez Alvarado, Hernandez Alvarado responded, in substance and in part, that Victim-1 needed to be killed, and that Hernandez Alvarado would direct JUAN CARLOS BONILLA VALLADARES, a/k/a "El Tigre," the defendant, to carry out the murder. At the time, BONILLA VALLADARES was a Regional Chief of the Honduran National Police, with authority over the police in several departments along the Guatemalan border, including Copán. Approximately three days later, Hernandez Alvarado told CW-1, in substance and in part, that BONILLA VALLADARES was monitoring Victim-1's location and planning Victim-1's murder. Soon thereafter, Hernandez Alvarado reported to CW-1 that BONILLA VALLADARES succeeded in having Victim-1 murdered. Hernandez Alvarado further told CW-1, in substance and in part, that BONILLA VALLADARES was able to coordinate Victim-1's murder despite the security protecting

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conspiracy, related weapons violations under 18 U.S.C. § 924(c), and making false statements to the DEA in October 2016.

<sup>2</sup> CW-1 has pleaded guilty, pursuant to a cooperation agreement, to drug-trafficking, money-laundering, and weapons offenses, as well as causing 56 murders. CW-1 has been cooperating with the DEA since in or about 2019 in the hope of obtaining leniency at sentencing. Information provided by CW-1 has been corroborated in part by, among other things, information from other witnesses.

Victim-1 because BONILLA VALLADARES had access to armed security and armored vehicles.

c. Based on my review of an English translation of a July 2011 Honduran press report, I know that, immediately following Victim-1's murder, BONILLA VALLADARES reportedly told a news outlet that Victim-1 and three of Victim-1's bodyguards were killed after being attacked in an armored vehicle by individuals using two 40-millimeter grenade launchers, M-16 rifles, and Galil rifles.<sup>3</sup> In purporting to investigate the murder, BONILLA VALLADARES reportedly also said that the murder was a well-planned surprise attack that was carried out efficiently; that the attackers cleaned up the crime scene thoroughly; and that there was no information to suggest that Victim-1 was involved in drug trafficking.

12. Based on my review of documents and my conversations with other law enforcement officers and a cooperating witness ("CW-2"),<sup>4</sup> I have learned the following, in substance and in part, with respect to CW-2:

a. From in or about 2006 up to and including in or about 2017, CW-2 managed the transport of hundreds of thousands of kilograms of cocaine through Honduras, across the Guatemalan border, for ultimate importation into the United States. CW-2 transported large quantities of this cocaine in trucks and other vehicles that were accompanied by security armed with firearms including AK-47 rifles and AR-15 rifles.<sup>5</sup> CW-2 transported cocaine

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<sup>3</sup> According to the individual identified below as CW-3, members of the Honduran National Police who assisted this cocaine trafficking operation were regularly armed with M-16 rifles and Galil rifles. Based on my training and experience, I know that M-16 rifles and Galil rifles are firearms capable of automatically shooting more than one shot, without manual reloading, by a single function of the trigger.

<sup>4</sup> CW-2 has pleaded guilty, pursuant to a cooperation agreement, to drug-trafficking offenses, and has admitted to committing acts of violence including murder. CW-2 has been cooperating with the DEA since in or about 2017 in the hope of obtaining leniency at sentencing. Information provided by CW-2 has been corroborated in part by, among other things, information from other witnesses.

<sup>5</sup> Based on my training and experience, I know that AK-47 rifles and certain AR-15 rifles are firearms capable of automatically

in particular for a Honduran drug-trafficking organization run by two individuals not named as defendants herein ("CC-1" and "CC-2") who worked in partnership with Hernandez Alvarado to manufacture and distribute cocaine.

b. In the course of transporting tons of cocaine for CC-1, CC-2, and Hernandez Alvarado, CW-2 observed armed members of the Honduran National Police, including JUAN CARLOS BONILLA VALLADARES, a/k/a "El Tigre," the defendant, facilitate the safe passage of CW-2's cocaine laden vehicles through inspection checkpoints without being stopped or examined. The Honduran National Police Officers involved in facilitating the cocaine shipments at these checkpoints were armed, including with AK-47 rifles and AR-15 rifles. CC-1 advised CW-2 that Hernandez Alvarado bribed these Honduran National Police Officers to ensure that the cocaine was not seized at the checkpoints, and that Hernandez Alvarado bribed BONILLA VALLADARES in particular.

c. As part of this effort to avoid seizure of the cocaine loads that CW-2 transported for CC-1, CC-2, and Hernandez Alvarado, CW-2 paid bribes to one of BONILLA VALLADARES's subordinate officers in the Honduran National Police who is not named as a defendant herein ("CC-3"). CC-3 told CW-2, in substance and in part, that BONILLA VALLADARES killed Victim-1 on behalf of Hernandez Alvarado.

13. Based on my review of documents and my conversations with other law enforcement officers and a cooperating witness ("CW-3"),<sup>6</sup> I have learned the following, in substance and in part, with respect to CW-3:

a. From in or about 2004 up to and including in or about 2016, Hernandez Alvarado, CW-3, and Mario Jose Calix Hernandez -- a former deputy mayor of the Gracias, Lempira, municipality in Honduras, who is another member of this drug-

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shooting more than one shot, without manual reloading, by a single function of the trigger.

<sup>6</sup> CW-3 has pleaded guilty, pursuant to a cooperation agreement, to drug-trafficking, money laundering, and weapons offenses, as well as causing 18 murders. CW-3 has been cooperating with the DEA since in or about 2018 in the hope of obtaining leniency at sentencing. Information provided by CW-3 has been corroborated in part by, among other things, consensually recorded meetings, consensually intercepted electronic communications, and information from other witnesses.

trafficking operation and a close associate of Hernandez Alvarado -- worked together and with others to manufacture and distribute approximately 140 tons of cocaine destined for the United States.<sup>7</sup>

b. During the course of his cocaine trafficking with CW-3, Hernandez Alvarado assured CW-3 that JUAN CARLOS BONILLA VALLADARES, a/k/a "El Tigre," the defendant, would protect their drug-trafficking operation.

c. For example, in or about 2010, Hernandez Alvarado advised CW-3, in substance and in part, that Hernandez Alvarado and his brother, CC-4, who was then President of the National Congress of Honduras, helped BONILLA VALLADARES advance his position within the Honduran National Police, and that BONILLA VALLADARES protected their drug trafficking activities in return. Hernandez Alvarado also explained, in substance and in part, that BONILLA VALLADARES was highly trusted by Hernandez Alvarado and CC-4; that BONILLA VALLADARES was very violent; and that Hernandez Alvarado and CC-4 entrusted BONILLA VALLADARES with special assignments, including murders.

d. CW-3 also understood that BONILLA VALLADARES protected Hernandez Alvarado's cocaine transport operations by, among other things, ensuring that the Honduran National Police did not stop vehicles carrying Hernandez Alvarado's cocaine and by providing sensitive information about law enforcement's aerial and maritime interdiction operations. For example, in or about 2014 and 2015, CW-3 coordinated cocaine shipments that arrived in Honduras by plane on clandestine airstrips and were then transited by vehicle across Honduras toward the Guatemalan border. The cocaine shipments were accompanied by armed security carrying firearms, including M-16 rifles. In the course of coordinating these shipments, CW-3 bribed members of the Honduran National Police, including two individuals not named as defendants herein ("CC-5" and "CC-6"), to ensure safe arrival and transport of the cocaine in Honduras. CC-5 and CC-6, who are relatives of BONILLA VALLADARES, told CW-3, in substance and in part, that Hernandez Alvarado and BONILLA VALLADARES were providing CC-5 and CC-6 with sensitive law enforcement information to ensure that the cocaine

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<sup>7</sup> Calix Hernandez stands charged in this District in Indictment S3 15 Cr. 379 (PKC) with narcotics and firearms offenses in connection with his involvement in the drug trafficking operation described herein. The United States has requested the arrest of Calix Hernandez from the Government of Honduras.



loads were not seized. CW-3 paid CC-5 and CC-6 hundreds of thousands of dollars in drug proceeds for their assistance securing safe passage of CW-3's cocaine. CC-5 and CC-6 confirmed to CW-3 that they in turn paid a portion of those drug proceeds to BONILLA VALLADARES and Hernandez Alvarado.

14. Based on my review of documents and my conversations with other law enforcement officers and a cooperating witness ("CW-4"),<sup>8</sup> I have learned the following, in substance and in part, with respect to CW-4:

a. From in or about 2002 up to and including in or about 2013, CW-4 was a leader of a major drug-trafficking organization in Honduras. CW-4 manufactured and distributed tons of cocaine destined for the United States, including with CC-1, CC-2, CW-1, and CW-2, among others.

b. In or about 2003, CW-4 met with JUAN CARLOS BONILLA VALLADARES, a/k/a "El Tigre," the defendant, to seek assistance in locating and assassinating a rival Honduran drug trafficker ("Victim-2"). BONILLA VALLADARES told CW-4, in substance and in part, that, in exchange for payment, BONILLA VALLADARES and other members of the Honduran National Police would locate Victim-2 and track Victim-2's movements so that Victim-2 could be murdered. CW-4 paid BONILLA VALLADARES approximately \$300,000 to carry out this murder-for-hire plan, though CW-4 ultimately had Victim-2 murdered through other means.

15. Based on my training and experience, I know that the vast majority of cocaine that is transported through Honduras is ultimately imported into the United States.

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<sup>8</sup> CW-4 has pleaded guilty, pursuant to a cooperation agreement, to drug-trafficking, money-laundering, and weapons offenses, as well as causing 78 murders. CW-4 has been cooperating with the DEA since in or about 2013 in the hope of obtaining leniency at sentencing. Information provided by CW-4 has been corroborated in part by, among other things, consensually recorded meetings, consensually intercepted electronic communications, and information from other witnesses.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of JUAN CARLOS BONILLA VALLADARES, a/k/a "El Tigre," the defendant, and that he be imprisoned or bailed, as the case may be.

S/ by the Court with consent

BRIAN J. FAIRBANKS  
Special Agent  
Drug Enforcement Administration

Sworn to me through the  
transmission of this Affidavit  
by reliable electronic means, pursuant to  
Federal Rule of Criminal Procedure 4.1,  
this 29th day of April, 2020



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THE HONORABLE ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK