

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 18-CR-20758-Cooke

UNITED STATES OF AMERICA

vs.

MANUEL ANTONION BALDIZON MENDEZ,

**Defendant.**

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**STIPULATED FACTUAL PROFFER IN SUPPORT OF PLEA**

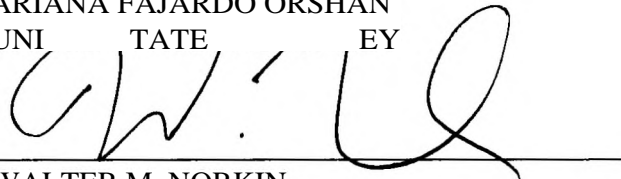
If this matter were to proceed to trial, the Government would prove the following facts beyond a reasonable doubt. **The Parties agree that these facts**, which do **not include all** facts **known** to the Government and the Defendant, **MANUEL ANTONION BALDIZON MENDEZ**, are sufficient to prove the guilt of the Defendant of the above-referenced Information:

Co-conspirator testimony and corroborating evidence would show that, during the time period of the Information, the Defendant was a political figure in Guatemala. As a politician known for social welfare **programs benefitting the elderly**, the Defendant was a trusted political ally of Alvaro Colom's campaign in 2007. The Defendant worked to support Colom's campaign and frequently introduced Colom during **public speaking events**. **Colom** was eventually elected president of Guatemala. Thereafter, during the 2011 and 2015 election cycles, the Defendant **himself** was **a presidential candidate in Guatemala**. As a **campaign** supporter and later as a **presidential candidate**, the Defendant solicited **money to fund those** political campaigns.

Co-conspirator testimony and corroborating evidence would show that, among those who **contributed to the campaigns were narcotics traffickers and the Defendant**, in collecting money for


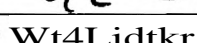
the campaigns, accepted the contributions knowing that those donations (a) were being made by narcotics traffickers and (b) were the proceeds of narcotics trafficking. For example, in or about 2014 and 2015, the Defendant was provided money that originated from a narcotics trafficker. Rather than using this money to fund his campaign directly, the Defendant instead used the money to purchase a condominium in Miami, Florida valued at approximately \$800,000, and thereafter personally donated an equal amount of money to his campaign. The Defendant knew that the original source of the money used to purchase the real estate was a narcotics trafficker and that the money itself was proceeds of narcotics trafficking. Thus, in order to disguise the source of the funds and to conceal that a campaign contribution was being made by a narcotics trafficker, the Defendant engaged in a circuitous transaction, as opposed to having the money from the narcotics trafficker go directly into the campaign funds.

ARIANA FAJARDO ORSHAN  
UNITED STATES ATTORNEY



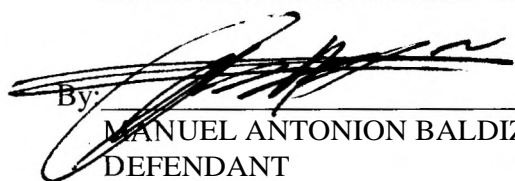
By: \_\_\_\_\_  
WALTER M. NORKIN  
ASSISTANT UNITED STATES ATTORNEY

Date: 10-3-18

  
  
BILL CLAY, ESQ.  A. CLAY  
CARLOS LEON, ESQ.  
ATTORNEYS FOR DEFENDANT

By: \_\_\_\_\_  
BILL CLAY, ESQ.  
CARLOS LEON, ESQ.  
ATTORNEYS FOR DEFENDANT

Date: 10-3-18

  
By: \_\_\_\_\_  
MANUEL ANTONION BALDIZON MENDEZ  
DEFENDANT

Date: 10-3-18