

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN-DUBUQUE DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. CR 07-1023 LRR
)	
vs.)	
)	
ARMANDO ANGULO, M.D.,)	
)	
Defendant.)	

GOVERNMENT MOTION TO DISMISS INDICTMENT

Pursuant to Federal Rule of Criminal Procedure 48(a), the United States moves to dismiss the indictment pending in the above-captioned matter as to defendant Armando Angulo, M.D.

Angulo was indicted by the United States on November 7, 2007. See Criminal Docket, at 2. An arrest warrant was issued for defendant’s arrest on that same date. See Criminal Docket, at 3. Angulo fled the United States in 2004, and has remained continuously out of the country for the past eight years. Through efforts of the Drug Enforcement Administration and United States Marshals Service, Angulo was located in early 2004 living in his home country of Panama. Despite the known whereabouts of Angulo, to date Panama has been unable or unwilling to extradite him. It is unlikely Panama’s position regarding Angulo’s extradition will change in the future.

As the Court is aware from its handling of the related defendants in this case, the Drug Enforcement Administration has maintained enormous volumes of discovery in the related investigation. These materials include two terabytes of electronic data (which consume approximately 5% of DEA’s world-wide electronic storage capacity),

several hundred boxes of paper documents, and dozens of computers, servers, and other bulky evidence. Continued storage of these materials is difficult and expensive.

Given the slim likelihood of Angulo's extradition from Panama, and the economic and practical hardship related to continued storage of evidence in this matter, the United States moves to dismiss the Indictment, with prejudice, against Armando Angulo.

Respectfully submitted,

s/ Stephanie M. Rose

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