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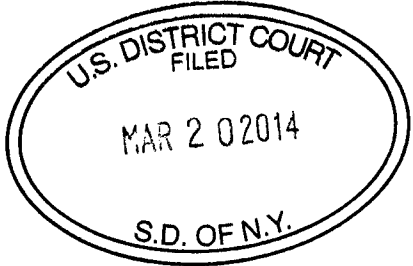
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA
:
- v. -
:
RONALD MOHAMMED NOERANIE BADLOE,
a/k/a "Roy," and
ERROL CLIFF RICHARDS,
a/k/a "Richard,"
:
Defendants.
:
----- x

SEALED INDICTMENT

14 Cr.

CRIM 187



COUNT ONE

The Grand Jury charges:

1. From at least in or about 2012 through the present, in Colombia and elsewhere, RONALD MOHAMMED NOERANIE BADLOE, a/k/a "Roy," and ERROL CLIFF RICHARDS, a/k/a "Richard," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree 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 RONALD MOHAMMED NOERANIE BADLOE, a/k/a "Roy," and ERROL CLIFF RICHARDS, a/k/a "Richard," the defendants, would and did distribute and possess with intent to distribute a controlled substance in violation of Title 21, United States Code, Sections 812 and 841(a)(1).

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3. The controlled substance involved in the offense was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

Overt Acts

4. In furtherance of the conspiracy, and to effect the illegal object thereof, RONALD MOHAMMED NOERANIE BADLOE, a/k/a "Roy," and ERROL CLIFF RICHARDS, a/k/a "Richard," the defendants, and others known and unknown committed the following overt acts, among others:

a. On or about October 25, 2013, BADLOE attended a meeting in Bogota, Colombia, where he and others discussed, among other things, the transportation of hundreds of kilograms of cocaine from Venezuela to the United States, with a portion of the cocaine being further transported to Canada.

b. On or about January 29, 2014, BADLOE and RICHARDS attended a meeting in Port of Spain, Trinidad, where they discussed, among other things, the transportation of hundreds of kilograms of cocaine from Mexico to the United States, with a portion of that cocaine being further transported to Canada.

c. On or about February 14, 2014, a coconspirator not named as a defendant herein delivered approximately \$109,900 in U.S. currency to another individual in

Manhattan, New York, in partial payment for approximately twenty kilograms of cocaine to be transported from Mexico to Canada through the United States.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

5. From at least in or about 2012 through the present, in Colombia and elsewhere, RONALD MOHAMMED NOERANIE BADLOE, a/k/a "Roy," and ERROL CLIFF RICHARDS, a/k/a "Richard," the defendants, who will be arrested and first brought to the Southern District of New York, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

6. It was a part and an object of the conspiracy that RONALD MOHAMMED NOERANIE BADLOE, a/k/a "Roy," and ERROL CLIFF RICHARDS, a/k/a "Richard," the defendants, and others known and unknown, would and did import into the United States from a place outside thereof five kilograms and more of a mixture and substance containing a detectable amount of cocaine, in violation of Sections 812, 952(a), 960(a)(1), and 960(b)(1)(B) of Title 21, United States Code.

7. It was further a part and an object of the conspiracy that RONALD MOHAMMED NOERANIE BADLOE, a/k/a "Roy,"

and ERROL CLIFF RICHARDS, a/k/a "Richard," the defendants, and others known and unknown, would and did distribute a controlled substance, to wit, five kilograms and more of a mixture and substance containing a detectable amount of cocaine, intending and knowing that such substance would be imported into the United States from a place outside thereof, and into waters within a distance of 12 miles of the coast of the United States, in violation of Sections 812, 959(a), 960(a)(3) and 960(b)(1)(B) of Title 21, United States Code.

Overt Acts

8. In furtherance of the conspiracy, and to effect the illegal object thereof, the overt acts set forth in Paragraph 4, supra, among others, were committed.

(Title 21, United States Code, Sections 812, 952, 959, 960 and 963; and Title 18, United States Code, Section 3238.)

FORFEITURE ALLEGATION

9. As a result of committing the controlled substance offenses alleged in Counts One and Two of this Indictment, RONALD MOHAMMED NOERANIE BADLOE, a/k/a "Roy," and ERROL CLIFF RICHARDS, a/k/a "Richard," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the offenses and any and all property used or intended to be used in any manner

to facilitate the commission of the offenses alleged in Counts One and Two of this Indictment.

Substitute Asset Provision

10. If any of the property described above as being subject to forfeiture, 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 person;
- 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 defendant up to the value of the above forfeitable property.

(Title 21, United States Code;
Sections 853 and 970.)



FOREPERSON



PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

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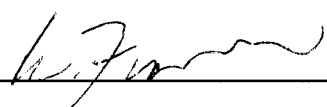
Defendants.

SEALED
INDICTMENT

14 Cr.

21 U.S.C. §§ 812, 841, 846, 959, 963

PREET BHARARA
United States Attorney.



Foreperson

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Filed Sealed Indictment
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Judge Meas
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