

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : SEALED SUPERSEDING  
 : INDICTMENT  
 - v. - :  
 : S1 12 Cr. 120  
 RAWSON EDWARD WATSON, :  
 NICOLAS EPSKAMP, and :  
 NAYEF MAHMOUD FAWAZ, :  
 :  
 Defendants. :

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COUNT ONE

The Grand Jury charges:

1. From at least in or about January of 2009 through and including in or about December of 2011, RAWSON EDWARD WATSON, NICOLAS EPSKAMP, and NAYEF MAHMOUD FAWAZ, the defendants, who will first enter the United States in the Southern District of New York, and others known and unknown, 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 RAWSON EDWARD WATSON, NICOLAS EPSKAMP, and NAYEF MAHMOUD FAWAZ, the defendants, and others known and unknown, would and did possess with intent to distribute a controlled substance on board an aircraft registered in the United States, in violation of 21 U.S.C. §§ 812, 959(b), and 960(a)(3).

3. The controlled substance involved in the offense was 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of 21 U.S.C. § 960(b)(1)(B).

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed:

a. In or about August of 2011, NAYEF MAHMOUD FAWAZ, the defendant, contacted a representative of a plane-chartering company and requested that an airplane be provided for the transportation of cargo.

b. On or about October 21, 2011, FAWAZ again contacted the representative of the plane-chartering company and stated that two British nationals who worked for him would be flying with approximately 20-40 pieces of luggage from the Dominican Republic to Belgium.

c. On or about October 31, 2011, FAWAZ contacted the representative of the chartering company and indicated that he wanted the airplane to be thoroughly washed after the luggage was loaded on to the plane.

d. On or about December 7, 2011, RAWSON EDWARD WATSON, the defendant, placed a call to an individual who had been hired to fly an aircraft and discussed the details of the

aircraft that would be used to transport the narcotics, including the American registration number of the plane.

e. On or about December 7, 2011, WATSON placed a call to FAWAZ and informed him that they had secured the new plane with an American registration number.

f. On or about December 14, 2011, NICOLAS EPSKAMP, the defendant, participated in a call with WATSON, during which he discussed the final logistics for the upcoming flight from the Dominican Republic, including the specific documents EPSKAMP would need for the trip.

g. On or about December 15, 2011, WATSON boarded a private aircraft with a tail number that began with the letter "N," shortly after this aircraft was loaded with 1000 kilograms of cocaine.

h. On or about December 15, 2011, EPSKAMP attempted to board the private aircraft referenced in Paragraph "g" above.

(Title 21, United States Code, Section 963.)

#### FORFEITURE ALLEGATION

5. As a result of committing the controlled substance offenses alleged in Count One of this Indictment, RAWSON EDWARD WATSON, NICOLAS EPSKAMP, and NAYEF MAHMOUD FAWAZ, the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. §§ 853 and 970, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a

result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Indictment.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. §§ 853 and 970, to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

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



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PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

RAWSON EDWARD WATSON  
NICOLAS EPSKAMP, and  
NAYEF MAHMOUD FAWAZ

Defendants.

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SUPERSEDING INDICTMENT

S1 12 Cr. 120  
(21 U.S.C. § 963)

PREET BHARARA  
United States Attorney.

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WARRANT FOR ARREST

<b>United States District Court</b>		DISTRICT <b>SOUTHERN DISTRICT OF NEW YORK</b>	
UNITED STATES OF AMERICA  v.  RAWSON EDWARD WATSON		DOCKET NO. <b>8(1)12CR120</b>	MAGISTRATE'S CASE NO.
WARRANT ISSUED ON THE BASIS OF: <input type="checkbox"/> Order of Court <input checked="" type="checkbox"/> Indictment <input type="checkbox"/> Information <input type="checkbox"/> Complaint		NAME AND ADDRESS OF INDIVIDUAL TO BE ARRESTED  <b>RAWSON EDWARD WATSON</b>	
		DISTRICT OF ARREST	
TO: UNITED STATES MARSHAL OR ANY OTHER AUTHORIZED OFFICER		CITY	
YOU ARE HEREBY COMMANDED to arrest the above-named person and bring that person before the United States District Court to answer to the charge(s) listed below.			
<b>DESCRIPTION OF CHARGES</b>			
Narcotics Conspiracy			
IN VIOLATION OF	UNITED STATES CODE TITLE <b>21</b>	SECTION <b>963</b>	
BAIL	OTHER CONDITIONS OF RELEASE		
ORDERED BY <b>KEVIN NATHANIEL FOX</b>	SIGNATURE (FEDERAL JUDGE/U.S. MAGISTRATE) <i>Kevin Nathaniel Fox</i>		DATE ORDERED <b>MAR 20 2011</b>
CLERK OF U.S. District Court Southern District of New York	(BY) DEPUTY CLERK		DATE ISSUED
<b>RETURN</b>			
This warrant was received and executed with the arrest of the above-named person.			
DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER	
DATE EXECUTED			

Note: The arresting officer is directed to serve the attached copy of the charge on the defendant at the time this warrant is executed.

WARRANT FOR ARREST

<b>United States District Court</b>		DISTRICT <b>SOUTHERN DISTRICT OF NEW YORK</b>	
UNITED STATES OF AMERICA  v.  NICOLAS EPSKAMP		DOCKET NO. <b>8(1)12 CR 120</b>	MAGISTRATE'S CASE NO.
		NAME AND ADDRESS OF INDIVIDUAL TO BE ARRESTED  <b>NICOLAS EPSKAMP</b>	
WARRANT ISSUED ON THE BASIS OF: <input type="checkbox"/> Order of Court <input checked="" type="checkbox"/> Indictment <input type="checkbox"/> Information <input type="checkbox"/> Complaint		DISTRICT OF ARREST	
TO: UNITED STATES MARSHAL OR ANY OTHER AUTHORIZED OFFICER		CITY	
YOU ARE HEREBY COMMANDED to arrest the above-named person and bring that person before the United States District Court to answer to the charge(s) listed below.			
<b>DESCRIPTION OF CHARGES</b>			
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BAIL	OTHER CONDITIONS OF RELEASE		
ORDERED BY <b>KEVIN NATHANIEL FOX</b>	SIGNATURE (FEDERAL JUDGE/U.S. MAGISTRATE) <i>Kevin Nathaniel Fox</i>		DATE ORDERED <b>MAR 20 2011</b>
CLERK OF COURT <b>United States Magistrate Judge Southern District of New York</b>	(BY) DEPUTY CLERK		DATE ISSUED
<b>RETURN</b>			
This warrant was received and executed with the arrest of the above-named person.			
DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER	
DATE EXECUTED			

Note: The arresting officer is directed to serve the attached copy of the charge on the defendant at the time this warrant is executed.



## WARRANT FOR ARREST

<b>United States District Court</b>		DISTRICT	
		SOUTHERN DISTRICT OF NEW YORK	
UNITED STATES OF AMERICA v. NAYEF MAHMOUD FAWAZ		DOCKET NO.	MAGISTRATE'S CASE NO.
		(S17)12 CR120 	
WARRANT ISSUED ON THE BASIS OF: <input type="checkbox"/> Order of Court <input checked="" type="checkbox"/> Indictment <input type="checkbox"/> Information <input type="checkbox"/> Complaint		NAME AND ADDRESS OF INDIVIDUAL TO BE ARRESTED	
		NAYEF MAHMOUD FAWAZ	
		DISTRICT OF ARREST	
TO: UNITED STATES MARSHAL OR ANY OTHER AUTHORIZED OFFICER		CITY	
YOU ARE HEREBY COMMANDED to arrest the above-named person and bring that person before the United States District Court to answer to the charge(s) listed below.			
DESCRIPTION OF CHARGES			
Narcotics Conspiracy			
IN VIOLATION OF	UNITED STATES CODE TITLE	SECTION	
	21	963	
BAIL	OTHER CONDITIONS OF RELEASE		
ORDERED BY	SIGNATURE (FEDERAL JUDGE/U.S. MAGISTRATE)	DATE ORDERED	
KEVIN NATHANIEL FOX	<i>Kevin Nathaniel Fox</i>	MAR 20 2011	
CLERK OF COURT United States Magistrate Judge Southern District of New York	(BY) DEPUTY CLERK	DATE ISSUED	
RETURN			
This warrant was received and executed with the arrest of the above-named person.			
DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER	
DATE EXECUTED			

Note: The arresting officer is directed to serve the attached copy of the charge on the defendant at the time this warrant is executed.