

REPUBLIC OF LIBERIA) IN THE FIRST JUDICIAL CIRCUIT, CRIMINAL COURT "C"
MONTSERRADO COUNTY) FOR MONTSERRADO COUNTY, REPUBLIC OF LIBERIA,
SITTING IN ITS AUGUST TERM, A.D. 2026.

BEFORE HIS HONOUR: OUSMAN F. FEIKA.....ASSIGNED CIRCUIT JUDGE PRESIDING

IN RE: Republic of Liberia by and thru the Ministry of Justice,
represented b the Minister of Justice & Attorney General of the
Republic of Liberia, County of Montserrado, Republic of Liberia
.....**PLAINTIFF**

VERSUS

Nikola Ivancic, also known as Nikolas Ivancic, a foreign national;
Taras Zadereiko, also known as Tony, a Ukrainian national;
Mihovil Vrovac, also known as Michael; a Croatian national;
Srdan Seles, a foreign national; Johnn David Garces of foreign
National; Sheik Bashiru Kante; Gerlad Foley Smith, former Deputy
Director for Administration, Naitonal Security Agency; Edison M.
Brown; Mohammed Alpha Bah; Jammel V. Jallah; Christian L.
Nyantee; Christopher Saryeecee; Cayce L. Nelson; Dcp. Anthony T.
Blaye; Acp Wadell W. Kwarbo; Albenigo Janior; Madam Jowel
Howard Taylor, former Vice President of Liberia; Mark Quiah,
former Deputy Director for Operations, LCAA, Sekou, Nana &
Others to be identified..... **DEFENDANTS**

CRIMES:

1. Unlicensed Possession of Controlled
Drugs or Substances;
2. Unlicensed Importation of
Controlled Drugs/Substances;
3. Unlicensed Exportation of
Controlled Drugs/Substances;
4. Unlicensed Sale, Trading,
Administration, Dispensation,
Delivery, Distribution, Dispatch in
Transit, & Transportation of
Controlled Drugs/Substances;
5. Illicit Trafficking;
6. Criminal Conspiracy;
7. Criminal Facilitation,
8. Criminal Solicitation
9. Money Laundering,
10. Possession & Sale of Physical
Objects for Lethal Use and
11. Physical objects for Lethal Use

INDICTMENT WRIT OF ARREST

REPUBLIC OF LIBERIA, TO: MAJOR AUSTINE SEINAVULA, SHERIFF, MONTSERRADO
COUNTY, R.L. OR HIS DEPUTY, **GREETINGS:**

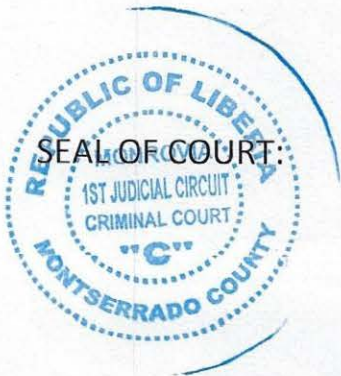
YOU ARE HEREBY COMMANDED TO ARREST THE LIVING BODIES OF ABOVE
NAMED **DEFENDANTS** IN THE ABOVE ENTITLED CAUSE OF ACTION, CHARGED
WITH THE COMMISSION OF THE ABOVE MENTIONED CRIMES, BASED UPON THE
INDICTMENT PREPARED AGAINST **THEM** BY THE GRAND JURY DULY SELECTED,
EMPANELLED, AND SWORN TO INQUIRE IN AND FOR THE PEOPLE OF
MONTSERRADO COUNTY, REPUBLIC OF LIBERIA, AND TO FORTHWITH BRING
THEM BEFORE THIS HONORABLE COURT, (FIRST JUDICIAL CIRCUIT, CRIMINAL
ASSIZES "C" FOR MONTSERRADO COUNTY), SITTING IN ITS **AUGUST TERM, A.D.
2026**, TO ANSWER TO THE SAID CHARGES MENTIONED SUPRA.

YOU ARE HEREBY FURTHER COMMANDED TO HAVE YOUR OFFICIAL RETURNS
ENDORSED ON THE BACK OF THIS WRIT OF ARREST, INDICATING THE MANNER
AND FORM OF ITS SERVICE.

AND FOR SO DOING, THIS SHALL CONSTITUTE YOUR LEGAL AND SUFFICIENT
AUTHORITY.

AND HAVE YOU THERE THIS WRIT OF ARREST:

GIVEN UNDER MY HAND AND SEAL
OF THIS HONORABLE COURT, THIS
7TH DAY OCTOBER, A.D. **2026.**




J. AMOS F. GBOWAH
CLERK OF COURT, CRIMINAL COURT "C"

Sewel Howard-Taylor
Oct 7, 2026
13:14 *SH Taylor*

BEFORE HIS HONOUR: ... ROOSEVELT Z. WILLIE, RESIDENT CIRCUIT JUDGE:

Republic of Liberia by and thru the Ministry of Justice,
represented by the Minister of Justice & Attorney General
of the Republic of Liberia, County of Monterrado, Republic
of Liberia PLAINTIFF

VERSUS

Nikola Ivancic, also known as Nikolas Ivancic, a foreign
national; Taras Zadereiko, also known as Tony, a Ukrainian
national; Mihovil Vrovac, also known as Michael, a Croatian
national; Srdan Seles, a foreign national; Johnn David Garces
a foreign national; Sheik Bashiru Kante; Gerald Folley Smith,
former Deputy Director for Administration, National
Security Agency; Edison M. Brown; Mohammed Alpha Bah;
Jammel V. Jallah; Christian L. Nyantee; Christopher Saryee
cee; Cayce L. Nelson; Dcp Anthony T. Blaye; Acp Wadell
W. Kwarbo; Albenigo Janior; Madam Jewel Howard Taylor,
former Vice President of Liberia; Mark Quiah, former
Deputy Director for Operations, LCAA, Sekou, Nana &
Others to be identified DEFENDANTS

Crimes:
*Unlicensed Possession of
Controlled Drugs or Substances;
Unlicensed Importation of
Controlled Drugs/Substances;
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Unlicensed Sale, Trading,
Administration, Dispensation,
Delivery, Distribution, Dispatch in
Transit, & Transportation of
Controlled Drugs/Substances;
Illicit Trafficking;
Criminal Conspiracy;
Criminal Facilitation, Criminal Soli
citation, Money Laundering,
Possession & Sale of Physical
Objects for Lethal Use
Physical Objects for Lethal Use*

INDICTMENT

THE SPECIAL GRAND JURY FOR MONTERRADO COUNTY, REPUBLIC OF LIBERIA, UPON OATH, DO HEREBY FIND, MORE PROBABLY THAN NOT, THAT:

GENERAL ALLEGATIONS-

At all times relevant to this indictment:

- 1) The Defendant **Nikola Ivancic**, also known as **Nikolas Ivancic**, a Croatian is believed to have resided in Dubai, the United Arab Emirates (UAE).
- 2) The Defendant **Taras Zadereiko**, also known as **Tony**, a Ukrainian national is believed to have resided in the Dubai, the United Arab Emirates (UAE).
- 3) The Defendant **Mihovil Vrovac**, also known as Michael, a Croatian national is believed to have resided in the United Arab Emirates.
- 4) The Defendant **Srdan Seles**, a Serbian is believed to have resided outside of Liberia at certain periods and at other times in the Cement Road Community, VOA, Paynesville.
- 5) The Defendant **Johann David Garc(E)S Grajales**, a Columbian-Spanish national is believed to have resided Spain but with frequent to Dubai, the United Arab Emirates (UAE) .
- 6) The Defendant **Sheik Bashiru Kante** resided in the United States of America with frequents visits to Monrovia, Monterrado County, Republic of Liberia, and Dubai, the United Arab Emirates (UAE).

- 7) **Gerald Folley Smith**, a Liberian national and Deputy Director for Administration of the National Security Agency (NSA) from 2018 to January 2024, resided in the City of Monrovia, Republic of Liberia.
- 8) The Defendant **Edison M. Brown**, a Liberian national resided in the City of Monrovia, Montserrado County, Republic of Liberia.
- 9) The Defendant **Mohammed Alpha Bah**, a Liberian national resided in the City of Monrovia, Montserrado County, Republic of Liberia.
- 10) The Defendant **Jammel V. Jallah**, a Liberian national resided within the City of Paynesville, Montserrado County, Republic of Liberia.
- 11) **Christian L. Nyantee**, Liberian national resided within the City of Paynesville, Montserrado County, Republic of Liberia.
- 12) The Defendant **Christopher Saryee** also known as Chris-cee, a Liberian national resided in Sinkor, Airfield, Montserrado County, Republic of Liberia.
- 13) The Defendant **Caycee L. Nelson**, a Liberian national and former employee of the Ministry of Gender, Children and Social Protection, resided in the City of Monrovia, Montserrado County, Republic of Liberia.
- 14) The Defendant Dcp **Anthony T. Blaye**, a Liberian national resided in Tweh Farm Community, Montserrado County, Republic of Liberia, and served as Chief of the Financial Crime Division, Liberian National Police (LNP).
- 15) The Defendant Acp **Wadell W. Kwarbo**, a Liberian national resided in Marshall, Margibi County, Republic of Liberia, and served as Chief of Highway Patrol Section, Liberia National Police (LNP).
- 16) The Defendant **Albenigo Janior**, a Liberian national resided within Baptist Seminary Community, Gbenbah Town, Montserrado County, Republic of Liberia, and served as an officer of the National Security Agency (NSA).
- 17) The Defendant **Madam Jewel Howard Taylor** resided in Congo Town, Tubman Boulevard, Montserrado County, Republic of Liberia, and served as the Vice President of the Republic of Liberia from January 2018- January 2023.
18. The Defendant **Mark Quiah** resided in the City of Monrovia, and served as the Deputy Director of Operations, Liberia Civil Aviation Authority (LCAA).

THE COCAINE ENTERPRISE

1. From at least approximately 2021 through July 2026, in Montserrado County and elsewhere within and outside the Republic of Liberia, the Defendants, together with other persons known and unknown to the Grand Jury, knowingly and intentionally participated in, conspired with, facilitated, solicited, transported, possessed, imported, exported and/or trafficked substantial quantities of cocaine without lawful authorization or license.
2. The principal objective of the conspiracy was to establish and maintain the Republic of Liberia as a transit, reception, storage, transportation and onward shipment point for cocaine destined principally for Europe and other foreign destinations.

3. The criminal organization employed maritime transportation, fishing vessels, canoes, motor vehicles, containers, warehouses and stash houses, aircraft, aviation facilities, cargo-forwarding arrangements, financial transactions, encrypted communications, false or deceptive business purposes, and security escorts. The cocaine was transported into Liberia through maritime routes, including by vessel and subsequently by canoe through waterways connecting the sea with the Po River and surrounding areas.

4. The organization subsequently moved cocaine by motor vehicles from maritime receiving points in or around Harris-Ward Community, Royesville Township, toward Monrovia, including the Cement Road, VOA Community, Paynesville, Robertsfield Highway, Montserrado County, and other locations. The organization further sought to establish aviation arrangements through which cocaine could be transported out of Liberia to designated foreign destinations.

5. The organization used purported legitimate businesses, including mineral, cocoa, fishing, brokerage, aviation and charter-flight activities, as covers or logistical mechanisms for its narcotics operations. The organization also sought the assistance, protection, cooperation and/or participation of persons occupying or formerly occupying positions within governmental, security, aviation and law-enforcement institutions. Three Thousand Nine Hundred Seventy-one (3,971) plates of material subsequently established by laboratory examination to be cocaine, from a compound located on Cement Road, VOA Community, Robertsfield Highway, Montserrado County, on or about July 21, 2026. The approximate estimated street value of the seized cocaine is US\$317.68 million.

6. The physical evidence includes the seized cocaine, vehicles, electronic devices, firearm (Taurus pistol) and other materials recovered during searches; documentary and digital evidence includes search and seizure warrants, vehicle documents, business-registration documents, aircraft documents, telephone records, WhatsApp communications, electronic messages, audio communications and other digital material; and identified financial transactions and payments made in connection with transportation, aviation, security and logistical arrangements.

COUNT I
CRIMINAL CONSPIRACY
(Chapter 10, Section 10.4 of the Penal Law)

1. **THE SPECIAL GRAND JURORS OF MONTSERRADO COUNTY, REPUBLIC OF LIBERIA, UPON THEIR OATH, DO HEREBY FIND MORE PROBABLY THAN NOT THAT:** The Defendants, **Nikola Ivancic** (one of the Kingpin of the Cartel), a Croatian national, **Taras Zadereiko**, also known as **Tony**, a Ukrainian national, **Mihovil Vrovac**, also known as **Michael**, a Croatian national, **Srdan Seles**, a Serbian national, **Johann David Garces Grajales**, a Columbian-Spanish national, **Sheik Bashiru Kante**, a Liberian national, **Gerald Folley Smith**, former Deputy Director for Administration of the National Security Agency (NSA), **Edison M. Brown**, **Mohammed Alpha Bah**, **Jammel V. Jallah**, former Chief of Armory of the National Security Agency, NSA, **Christian L. Nyantee**, personnel of the National Security Agency (NSA), **Christopher Saryee**, **Caycee L. Nelson**, former employee of the Ministry of Gender, Children & Social Protection, **Anthony T. Blaye**, former Chief of the Financial Crime Division, Liberia National Police, **Wadell W. Karbo**, former Chief of Highway Patrol Section, Liberia National Police (LNP), **Albenigo Janior**, Maintenance Officer of the National Security Agency (NSA), and **Madam Jewel Howard-Talyor**, former Vice President of the Republic of Liberia, did conspire to, and did do and commit the crime of, **Criminal Conspiracy** in

violation of Chapter 10, Sub-chapter "D", Section 10.4(1)(2)(3)(4) of the New Penal Law of Liberia in the form and manner as follows to wit:

2. The General allegations section of this indictment is re-alleged and incorporated by reference as if fully set out herein.

3. From at least as early 2021, and continuing through in or around **August 2026**, in the City of Monrovia, Montserrado County, and elsewhere, the Defendants and co-conspirators **Nikola Ivancic**, a Croatian national, **Taras Zadereiko**, also known as **Tony**, a Ukrainian national, **Mihovil Vrovac**, also known as **Michael**, a Croatian national, **Srdan Seles**, a Serbian national, **Johann David Garces Grajales**, a Columbian-Spanish national, **Sheik Bashiru Kante**, **Gerald Folley Smith**, former Deputy Director for Administration of the National Security Agency (NSA), **Edison M. Brown**, **Mohammed Alpha Bah**, **Jammel V. Jallah**, **Christian L. Nyantee**, **Christopher Saryee**, **Caycee L. Nelson**, **Anthony T. Blaye**, former Chief of the Financial Crime Division, **Wadell W. Karbo**, former Chief of Highway Patrol Section, **Liberia National Police (LNP)**, **Albenigo Janior**, **National Security Agency (NSA)**, and **Madam Jewel Howard-Taylor**, former Vice President of the Republic of Liberia, did knowingly and intentionally and with the purpose of promoting and facilitating the commission of the crimes of the Unlicensed Importation of Controlled Drugs/ Substances, Unlicensed Possession of Controlled Drugs/ Substances, Unlicensed transportation of Controlled Drugs/Substances, Unlawful Maintenance of a place for Drugs and Substances, Possession and Sale of Physical Objects for Lethal Use, conspire and agree with one or more of each other, to further the object of the conspiracy and engage in or cause the performance of conduct constituting violations of the Controlled Drugs and Substances Act (2023) as amended, including the unlicensed importation, transportation, exportation, and possession of controlled drugs/substances, illicit trafficking of cocaine, and money laundering.

4. The manner and means by which the defendants conspired and sought to accomplish the purpose and object of their conspiracy included amongst others the following.

5. **Nikola Ivancic**, from at least as early 2021, and continuing through or around **August 2026**, directed the command structure of the cocaine enterprise described hereinabove from Dubai, United Arab Emirates (UAE) with Co-Defendants **Mihovil Vrhovac alias Michael** and **Taras Zadereiko alias Tony** serving as the local operatives and the directing minds of the cocaine enterprise within Liberia, and reporting to their principal Co-defendant **Nicolas Ivancic**. **Nicolas**, **Tony** and **Michael**, organized a meeting that was held in Dubai in November of 2021, which was attended by Co-Defendants **Nicolas**, **Madam Jewel Howard-Taylor**, **Sheikh Basiru Kante**, **Michael**, **Tony** and a person known as **Dejan** (a Russian National) at the-H-Hotel, Trade Centre Roundabout, Sheikh Zayed Road, Dubai, United Arab Emirates (UAE), for the purpose of promoting, facilitating and organizing the illicit trafficking of drug through the Republic of Liberia. **Nicolas** recruited Co-Defendant **Madam Jewel Howard Taylor** at that meeting, to provide protection at a high governmental level for the illicit trafficking of cocaine through Liberia, and promised that cocaine will be trafficked through Liberia but will not be sold, distributed, and used on the Liberian market, and that it will not be shipped to the United States of America (USA) or allies of the USA. **Nikolas** provided financial support from the proceeds of the cocaine to **Madam Jewel Howard-Taylor** and her Starfish Foundation, in consideration for her protection.

6. During **Michael** and **Tony** October 2021 visit to Liberia, **TONY** and **MICHAEL** were also introduced to Co-Defendant **Gerald Folley Smith**, the former Deputy Director for Administration, National Security Agency (NSA), at Royal Grand Hotel in the City of Monrovia, Liberia, by **Sheikh Basiru Kante** who had organized the meeting, for the

purpose of recruiting **Gerald Folley Smith** to provide security protection and escort for the illicit trafficking of cocaine through Liberia. **Gerald Folley Smith** consented to **TONY** and **MICHAEL'S** request to provide security protection to the cartel for their operations in Liberia in exchange for money paid to him by Nikola Ivancic through Michael and Tony for his personal use and benefit. **Gerald Folley Smith** subsequently assigned NSA agents (Franklin Jallabah, Ekki Walters, and Prince Jaryenneh) to escort cocaine on several occasions from and to locations within the Republic of Liberia, designated by **Gerald Folley Smith**.

7. **Taras Zadereiko Alias Tony** participated in the conspiracy from at least as early as 2021. **TONY** and **Mihovil Vrovac alias Michael**, met Co-Defendant **Sheik Bashiru Kante** in Dubai in July 2021, and recruited him to work for the cartel. Tony and Micheal visited Liberia in October 2021 and were introduced to Madam Jewel Howard Taylor at her Sophie Road Residence, Congo Town, Montserrado County, by Sheikh Bashiru Kante. **Tony** and **Michael** extended an invitation to Co-Defendant **Madam Jewel Howard -Taylor** to meet with their boss, **Nikolas Ivancic**, in Dubai, UAE. The invitation was honored by Co-Defendant Madam Jewel Howard-Taylor, and she left Liberia on November 28, 2021, and met with Nicolas in Dubai, the UAE, in the same November 2021, at the H Hotel. Madam Taylor returned to Liberia from Dubai on December 6, 2021.

8. At about April 2026, **TONY** travelled to several counties within the Republic of Liberia including Grand Bassa, Grand Kru, Bong, Margibi, Bomi along with Co-defendants **Christopher Saryee, Caycee Nelson, Jammal Jallah, and Christian L. Nyantee** to identify land near a water way or the sea which would be suitable for the smooth importation, transport, and illicit trafficking of cocaine by sea unto land in Liberia using canoes to transport the cocaine. **TONY** decided to procure land in Royesville, Montserrado County, Republic of Liberia, because of its proximity to the Po-River, and financed the renovation/construction of a building on the land, which was used as the temporary storage facility for cocaine that was brought in canoes and offloaded and stored on the property. **TONY** directed the fishing/farmland cover-up and canoe-transport operation of cocaine from sea to the land and maintained the Royesville property for the purpose of the discharge and storing of unlicensed cocaine. **Tony** also transported cocaine from Royesville to the cocaine stash house on the Cement Road, VOA Community, Paynesville, Robertsfield Highway, Montserrado County, Republic of Liberia, in May of 2026. **TONY** and others loaded cocaine onto vehicles and transported cocaine from Royesville to the Cement Road, VOA Community, Liberia, on May 30 and 31, 2026. **TONY** organized and participated in meetings with Co-Defendants **Edison M. Brown, Mohammed Alpha Bah, Christian L. Nyantee** (Deputy Airport Commander for Spriggs Payne Airport, of the National Security Agency (NSA), , **Caycee Nelson, and Jammel V. Jallah** (former Chief of Armory of the National Security Agency), during which plans were made and agreed for obtaining landing permits for airplanes to be used to transport cocaine, landing locations, transportation and storage of cocaine.

9. **Mihovil Vrovac Alias Michael**, participated in the conspiracy from at least as early as 2021. The allegations outlined against Co-defendant **MIHOVIL VROVAC alias MICHAEL** in paragraphs 1, 2, 4, 5, and 6, of this indictment are re-alleged and incorporated by reference as if fully set forth herein. In addition, **MICHAEL**, organized and conducted a meeting on 2nd Street Sinkor, Tubman Boulevard, Montserrado County, Liberia on July 31, 2025, with Co-Defendants **Edison Brown, Mohammed Alpha Bah, Jamaal V. Jallah**(former Chief of Armory of the National Security Agency), **Christopher Saryee** and one other person, during which **MICHAEL** discussed and presented the roadmap for air-transport cover on the movement of narcotics, the frequency of special *airflight containing narcotics that will be imported into Liberia and exported to other destinations*. **MICHAEL** requested assistance in gathering maritime intelligence for the purpose of promoting and facilitating the importation, transportation and exportation of

cocaine within and without Liberia by sea. During the meeting, **MICHAEL** offered to provide encrypted communication devices to evade detection by Liberia law enforcement authorities and subsequently did provide encrypted communication devices to **Edison Brown, Alpha Bah, Christian L. Nyantee** (Deputy Airport Commander for Spriggs Payne Airport, of the National Security Agency (NSA)), **Jammal Jallah**, and others for the purpose of promoting and facilitating the cartel's illegal importation, possession, storing, export, and transportation of illicit drugs.

10. **Srdan Seles** was an operative of the cartel in Liberia who participated in the physical importation, loading and unloading of cocaine at Royesville, Montserrado County, Republic of Liberia, and transportation of cocaine to the Cement Road, VOA Community, Robertfield Highway, Paynesville, Montserrado County, Republic of Liberia. **Srdan Seles** personally transported the cocaine on board a Grey Nissan Van from Royesville to the Cement Road, VOA Community, Robertfield Highway. On July 21, 2026, **Srdan Seles** along with **Johann David Garces Grajales** were arrested in actual possession of the 3,971 plates (Three Thousand Nine Hundred Seventy-one) of cocaine in 157 bags (estimated value-US\$317 Million) at Cement Road, VOA Community, Robertfield Highway, Montserrado County, Republic of Liberia, and One pistol (Taurus) bearing serial number **AEJ724411G3C9X19**, a Grey Nissan Van bearing license plate #B1B0054 and with VIN #NV350 registered in the name of one Enzo Taylor, amongst other things. The Cement Road, VOA Community, Robertfield Highway, house in which the cocaine 3,971 plates were found.

11. **Johann David Garces Grajales**, Johann Davide Garces Grajales participated in the importation, storage, transportation, trafficking and attempted exportation of the 3,971 plates of cocaine in 157 bags (estimated value-US\$317 million). In July 21, 2026, **Johann David Garces Grajales** was arrested along with **Srdan Seles** in actual possession of the 3,971 plates of cocaine in 157 bags (estimated value-US\$317 Million) at Cement Road, VOA Community, Robertfield Highway, Montserrado County, Republic of Liberia. **Johann David Garces Grajales** and **Srdan Seles** were arrested in actual possession of the assorted equipment and one pistol (Taurus) bearing serial number **AEJ724411G3C9X19** described hereinabove.

12. **SHEIK BASHIRU KANTE** - participated in the conspiracy from at least as early as 2021. The allegations outlined against Co-defendant **SHEIK BASHIRU KANTE** in paragraphs 1, 2, 4, 5, and 6, of this indictment are re-alleged and incorporated by reference as if fully set forth herein. In addition, Co-defendant **SHEIK BASHIRU KANTE** registered a company named and styled Royal Gold International, that was engaged in the buying and shipment of diamond and gold from Liberia to Europe and other destinations. In mid-2021, Sheik Bashiru Kante travelled to Dubai, the United Arab Emirates (UAE), where he encountered **Taras Zadereiko alias Tony and Mihovil Vrovac alias Michael**, members of a criminal cocaine trafficking network. They met in the *Blu Night Club, Dubai, (Blu Dubai), located on the 32nd Floor of the V Hotel in Al Habtoor City, Business Bay, Dubai, United Arab Emirates*, where Michael and Tony informed Sheik Bashiru Kante that they were once doing business in Liberia but got duped multiple times. They emphasized that they needed protection from high level Liberian Government officials, and Sheik Bashiru Kante assured them that he had contacts in Liberia that could provide them the required protection. Michael and Tony agreed to visit Liberia upon Sheik Bashiru Kante's return to Liberia. Upon Sheik Bashiru Kante returned to Liberia, **Michael and Tony** visited Liberia in late 2021 and lodged at Royal Grand Hotel, 15th Street, Sinkor, Tubman Boulevard, Montserrado County, Liberia, where Sheik Bashiru Kante met them at the Roof Top and introduced Gerald F. Smith, Deputy Director for Operations, National Security Agency (NSA) to Michael and Tony. Sheik Bashiru Kante informed Gerald Folley Smith that Michael and Tony were in Liberia to do business and needed security protection. Gerald F. Smith accepted the offer to provide the

required security protection. Michael and Tony then told Sheik Bashiru Kante that their line of business in Liberia was to use Liberia as a transit for exportation of cocaine to Europe. In 2022, Sheik Bashiru Kante introduced Michael and Tony to the Former Vice President of Liberia, Madam Jewel Howard Taylor, at her Sophie Community Residence, Congo Town, Tubman Boulevard, Montserrado County, Liberia.

13. During that meeting, Michael and Tony, amongst other things, informed Madam Jewel Howard Taylor, in the presence of Sheik Bashiru Kante, that they wanted security protection from her for their business in Liberia, and invited her to meet their boss, Nikola Ivancic, in Dubai. Michael and Tony provided Twenty-seven Thousand United States Dollars (US\$27,000.00) to Sheik Bashiru Kante to facilitate Madam Jewel Howard Taylor's travel to Dubai (UAE). Madam Taylor met Nikola Ivancic along with Michael, Tony and Sheik Bashiru Kante in Dubai, UAE. Sheik Bashiru Kante maintained strong ties with Madam Taylor and Nikolas and on Madam Taylor's request, Nikolas contributed US\$75,000.00 to the Madam Taylor's charitable organization, Starfish Foundation. Meanwhile, Sheik Bashiru Kante continued to ship containers loaded with cocaine mixed with cocoa under the guise of shipping cocoa from Liberia to Europe with the aid of Edison M. Brown's brokerage firm.

14. **Gerald Folley Smith, Former Deputy Director for Administration of the National Security Agency (2018-2024)**, was introduced to Sheikh Bashiru Kante by some colleagues. A few weeks later, Sheik Bashiru Kante visited Gerald F. Smith at his NSA office, and subsequently invited and introduced him to Michael and Tony at the Roof Top, Royal Grand Hotel, Sinkor, Tubman Boulevard, Monrovia, Montserrado County, Liberia. At the Roof Top Meeting, Sheikh Bashiru Kante informed Gerald F. Smith that he was needed to provide security protection for the transportation and shipment of illegal drugs outside Liberia to other destinations, and Gerald F. Smith accepted the offer to provide security cover. Accordingly, Gerald F. Smith knowingly, willingly and intentionally provided and assigned NSA Security agents to provide security escort services on multiple occasions for the transportation, shipments and exportation of unlicensed drugs or substances out of Liberia. The NSA Agents assigned to provide security protection for the transportation, shipment and exportation of unlicensed drugs and substances were aware of the nature of the assignments and the fact that they were aiding and abetting the importation, transportation, shipment and exportation of unlicensed drugs or substances out of Liberia. The NSA agents were Franklin Jallabah, Ekki Walters and Prince Jaryenneh and they were paid approximately US\$2,000.00 to US\$5,000.00 each as compensation depending on the operation.

15. Under the cover of running a fishing company, Co-Defendant **Gerald F. Smith** procured fishing canoes, nets, a Toyota engine, and a parcel of land near the riverbank in Jummaba Village, Bomi County, to facilitate the cocaine operations. In further consideration of Gerald F. Smith's support to the cocaine enterprise, Gerald F. Smith was invited and traveled to Dubai on several occasions. Over the course of his involvement or participation in the cocaine trade, Gerald F. Smith received compensation from the cartel worth millions of US Dollars.

16. Through Gerald F. Smith's operations with the cartel, coastal locations, including an area known as Extreme Fishing, Jemmeha Village, Bomi County, were used to import and receive shipments arriving by boat into Liberia. Extreme Fishing is located in Riverview Community, Lower Virginia, Montserrado County. The operation was such that boats met incoming vessels offshore, transferred the cargo to the boat, and the cargo is transported under heavy security escorts to designated locations such as Parker Corner, Brewerville, Montserrado County, where Gerald F. Smith rented a compound. Under the guise of running a fishing company, Gerald F. Smith procured fishing canoes, nets, a Toyota engine, and a parcel of land near the riverbank in Jummaba Village, Bomi County,

to facilitate the cocaine operations. In further consideration of Gerald F. Smith's support to the cocaine enterprise, Gerald F. Smith was invited and traveled to Dubai on several occasions. Over the course of his involvement or participation in the cocaine trade, Gerald F. Smith received compensation from the cartel worth millions of US Dollars.

17. **Edison M. Brown, Cayce Nelson, Mohammed Alpha Bah, Christian L. Nyantee, & Jammal V. Jallah.** Edison M. Brown is the Chief Executive Officer (CEO) of a brokerage company referred to as "Brown's Trucking Handling Services Enterprise, Edrine Rock Crusher, and Edna Cargo Services". Defendant Edison M. Brown was the commercial-logistics and financial facilitator who provided the legitimate-business infrastructure and financing through which the foreign cocaine network established a Liberian transportation and aviation structure. He used his brokerage enterprise for cocaine-cocoa shipments; personally participated in the removal and transportation of concealed cartons from a cocoa container at the Freeport of Monrovia; financed and facilitated the aircraft's entry, parking and licensing; participated in establishing the purported charter company; participated in recruitment of aviation, airport and security personnel; facilitated encrypted communications; financed reconnaissance of alternative cocaine landing sites; and supplied US\$100,000 for the recruitment/payment of an airport insider. Edison M. Brown was introduced to Michael and Tony because Brown's brokerage company was used to ship the cocaine-cocoa commodities from Liberia to Europe. On **28 March 2022**, Edison M. Brown personally signed the Hinterland Resources booking for four containers declared as cocoa destined for Antwerp, with materially inconsistent weights identified in the recovered bills of lading. Between 2021 through 2026, Edison M. Brown and Sheik Bashiru Kante made multiple shipments of containers loaded with cocaine concealed among cocoa to Europe through Edison M. Brown's brokerage company - Brown's Trucking Handling Services Enterprise, and Edna Cargo Services". Between late 2023 to early 2024, Jammal V. Jallah contacted Christian L. Nyantee (NSA Agent) to secure an isolated place within the Freeport of Monrovia to do weight balancing of a 40ft container that he (Jammal V. Jallah) claimed to contain Cocoa. On August 25, 2025, Edison M. Brown booked rooms at the Royal Grand Hotel for the pilots after the aircraft arrived at James Spriggs Payne Airfield.

18. On August 25, 2025, an agreement was signed between the Zentro Solutions and Infinite Holdings, Inc., wherein Infinite Holdings, which is associated with Edison M. Brown and Mohammed Alpha Bah, purchased the aircraft from Zentro Solutions for Three Million Eight Hundred and Forty-Five Thousand United States Dollars. On the same day, August 25, 2025, Edison M. Brown booked two rooms at the Royal Grand Hotel for the pilots after the aircraft arrived at James Spriggs Payne Airfield. When the flight arrived in Liberia, there were no seats inside. The LCAA technical team and the consultant who came from Ghana raised concerns. Christian L. Nyantee received the two white pilots: Malcolm Cameron McLellan and Warren Richard Jones. While on their way to the hotel, the pilots insisted that they could not stay in Liberia because their return flight was scheduled for the same date, August 25, 2025. Thereafter, Christian L. Nyantee took the pilots back to James Spriggs Payne Airfield (JSPA). Within ten (10) minutes, Christopher Saryee, Michael, and Tony arrived at the JSPA and settled the situation with the pilots and the pilots flew with another aircraft via the Roberts International Airport (RIA). Edison M. Brown then requested that Christian L. Nyantee sign the bill for the plane, which he did, and he communicated with Jammal V. Jallah and Edison M. Brown. Afterward, Edison Brown sent the payment for the Liberty Hangar bill (the parking area for the aircraft) through Christian L. Nyantee via Lonestar Mobile Money. Christian L. Nyantee made this payment to the Liberia Airport Authority on August 26, 2025, in the amount of US\$262.00. A receipt number 1707 was issued to Zentro Solutions, Inc., the same company that purchased the aircraft. Jammal V. Jallah sent the receipt of payment to Edison M. Brown via WhatsApp on August 26, 2025, at 9:40 PM. Christian L. Nyantee was tasked with receiving the aircraft on August 25, 2025. He recorded a video and took

pictures of the aircraft's arrival and subsequent storage at the hangar. The recorded video was sent to Edison M. Brown on August 25, 2025, at 12:44 PM.

19. On September 15, 2025, Cayce Nelson and Franklyn Herbert visited the Liberia Civil Aviation Authority (LCAA) office at the RIA and introduced the nature of the business undertaking. A team of the LCAA walked Cayce Nelson and Franklyn Herbert through the process and shared a template of application form that was needed in applying for a license. Thereafter, the application form was filled in and submitted to LCAA. The LCAA, on September 16, 2025, under invoice #1231, addressed to Intertropic Holding, Inc., in the amount of US\$9,750.00 (Nine Thousand Seven Hundred and Fifty Dollars United States Dollars). Edison M. Brown, on September 17, 2025, deposited into LCAA account (00121970079410602) at IB as payment for the license and the allowances for the five LCAA's employees that should have travelled to Malawi for the maintenance inspection of the flight. The deposit slip reference number is 1413. In furtherance of the cartel operations, Jammel V. Jallah, Edison M. Brown, Mohammed Alpha Bah and Cayce Nelson agreed to recruit personnel assigned at the RIA and NSA respectively and Cayce Nelson recruited Mark Kuiah, former Deputy Director for Operations, RIA, who accepted to join the cartel trade. Mark Kuiah proposed US\$250,000.00 as compensation for his services, and Cayce Nelson gave him US\$50,000.00 in advance. Mark Kuiah recruited F. Augustine Claudius Tamba, Deputy Director General of LCAA, and Abner Wanah Yonly, Sr., Manager, James Spriggs Payne Airfield and Jammel V. Jallah gave them (1) cellphone each; while Mark Kuiah and Cayce Nelson received two (2) for Communication.

20. Sometime early in March 2026, Jammel V. Jallah and Cayce Nelson travel to Maryland and Grand Kru to find suitable airfields for landing of the airplane, and Edison M. Brown financed the trip. Additionally, Christian Nyantee, Christopher Saryee, and Tony travelled to Bong, Nimba, Margibi and Bassa to secure a farm land, and Tony financed the trip. Finally, Christopher Saryee, Jammel V. Jallah, Taras Zadereiko alias Tony, Edison M. Brown, Mohammed Alpha Bah, Jammel V. Jallah, and Christian Lucky Nyantee purchased and secured a parcel of land for US\$3,200.00 (Three Thousand Two Hundred United States Dollars) at **Harris ward Community, Roysville, Montserrado County, Liberia**, under the guise of doing fishing business under the name Liberty Fishery, but use the property to import, store, transport and and export cocaine from Liberia to Europe.

21. **Mohammed Alpha Bah.** Defendant Mohammed Alpha Bah is a close associate and business partner to Edison M. Brown. They both owned multiple business together, to include the *B and B Holding or (Brown and Bah Holding)*, the same company that served as guest for the indicted Serbian national Marko Mihovic, on a Visa on Arrival number 10713-24 LIS, dated September 11, 2024. Mohammed Alpha Bah, Sheik Bashiru Kante, and Edison M. Brown travelled to Dubai in February 2022 and met Nikolas Ivancic. All three of them travelled on Air France flight AF879. Mohammed Alpha Bah participated in the aviation, sea and logistical structure, co-established along with Edison M. Brown. Mohammed Alpha. Bah participated in meetings concerning the actual purpose of the aircraft as more fully explained in subsection "G" above participated in the aviation and logistical structure established by Edison M. Brown and Jammeh V. Jallah; participated in meetings concerning the actual purpose of the aircraft as more fully explained in subsection "G" above. Mohammed Alpha Bah participated in the transportation of the cocaine from Roysville, Montserrado County, Republic of Liberia to Cement Road, VOA Community, Paynesville, Robertfield Highway, Montserrado County, Liberia. On September 11, 2024, Mohammed Alpha Bah used B&B Holding to sponsor the visa-on-arrival entry of the Serbian national Mirovic Vrhovac ("Michael") through Roberts International Airport and, with Edison M. Brown, facilitated Mirovic Vrhovac, Zadereiko ("Tony"), and the network aircraft into Liberia. Mohammed Alpha

Bah participated in the July 31, 2025, meeting held at 2nd Street, Sinkor, Tubman Boulevard, Montserrado County, wherein Mihovil Vrhovac (Michael) discussed and presented a roadmap for air-transport cover on the transportation of narcotics, the frequency of special airflight containing narcotics that will be imported into Liberia and exported to other destinations. The September 25, 2025, Cell-site evidence placed Mohammed Alpha Bah at the Marshall landing-site casing, linking him to the chosen maritime receiving point and onward ground logistics. Between 2025 -2026, a coded ledger documented US\$198,910.00 sent, US\$197,916.00 received after percentage, US\$106,000.00 to Jammal V. Jallah, and US\$20,000.00 to Sekou's group. Also, a US\$5,000.00 Ecobank cash deposit paid rent for the Duazon residence where the cocaine was recovered and confiscated. Mohammed Alpha Bah, Christopher Saryee, Jammal V. Jallah, Taras Zadereiko, Edison M. Brown, Mohammed Alpha Bah, Jammal V. Jallah, and Christian Lucky Nyantee travelled to the Township of Royesville, purchased and secured a parcel of land for US\$3,000.00 at **Harris ward Community** under the guise of doing fishing business, but the property was used to import, store, transport and eventually export cocaine from Liberia to Europe.

22. Mohammed Alpha Bah participated in the July 31, 2025, meeting held at 2nd Street, Sinkor, Tubman Boulevard, Montserrado County, wherein Mihovil Vrhovac (Michael) discussed and presented a roadmap for air-transport cover on the movement of narcotics, the frequency of special flights containing narcotics that will be imported into Liberia and exported to other destinations. Mohammed Alpha Bah drove his Volkswagen to the meeting bearing license plate A532249. The ownership of this vehicle was confirmed by the Ministry of Transport to be registered to Mohammed Alpha Bah. On September 25, 2025, Mohammed Alpha Bah was amongst those who visited the Marshall beach front, looking for suitable land to move their narcotics inward towards their stash house. During that meeting, Mohammed Alpha Bah stated that they have 40 cartons of narcotics that they need to bring to shore during the first operation.

23. **Jammal V. Jallah.** Jammal V. Jallah participated in the aviation, security and narcotics logistics structure; arranged for Christian Nyantee to receive and assist the pilots; recruited Caycee Nelson into the aviation enterprise and participated in meetings concerning the aircraft and its purported business. Jammal V. Jallah participated in meetings for the establishment of "**Afri-Connect Airlines**" in September- early October 2025, and the recruitment of people assigned at the RIA and NSA to support the cocaine trade. Jammal V. Jallah disclosed to Cayce Nelson that the actual airline business was to move drugs from an unknown country to Liberia as a TRANSIT point; that Jammal V. Jallah and Edison M. Brown asked Mark Kuiah through Cayce Nelson to recruit and he did recruit *F. Augustine Claudius Tamba*, and *Abner Wanah Yonly, Sr.*, but they did not provide any support. In early March 2026, Jammal V. Jallah and Cayce Nelson travel to Maryland and Grand Kru to find suitable airfields for landing of the airplane. Jammal V. Jallah along with Christopher Saryee, Jammal V. Jallah, Taras Zadereiko, Edison M. Brown, Mohammed Alpha Bah, and Christian Lucky Nyantee travelled to the Township of Royesville where they purchased and secured a parcel of land for US\$3,200.00 at **Harris ward Community, Royesville, Montserrado County**, under the guise of doing fishing business, under the name Liberty Fishery, but the property was used to import, store, transport and export cocaine from Liberia to Europe. Jammal V. Jallah directed Christian L. Nyantee to obtain police escort for the cocaine movement, and provided money for security payments; participated in the acquisition and use of the Royesville property, as well as the May 2026 cocaine movements.

24. **Christian L. Nyantee.** Christian L. Nyantee participated in meetings and facilitated the coming of the cocaine cartel airplane in Liberia and signed the bill for the plane before Edison Brown settled the bill for the Liberty Hangar (parking area for the aircraft) through Christian L. Nyantee via Lone Star mobile money. Sometime early

March 2026, Christian L. Nyantee participated in a meeting that resulted to Jammel V. Jallah and Cayce Nelson travel to Maryland and Grand Kru to find suitable airfields for landing of the airplane. Christian L. Nyantee, Jammel V. Jallah, Caycee Nelson, Edison M. Brown, Mohammed Alpha Bah, and Tony participated in another meeting that caused him (Christian L. Nyantee), Christopher Saryee, and Tony to travel to Bong, Nimba, Margibi and Bassa to secure farmland for landing of the aircraft. Tony financed the trip. Christian L. Nyantee also travelled with Christopher Saryee, Jammel V. Jallah, Tony, Edison M. Brown, Mohammed Alpha Bah, and Jammel V. Jallah, to the Township of Royesville where they purchased and secured a parcel of land for US\$3,200.00 under the guise of doing fishing business under the name *Liberty Fishery*, but the property was used to import, store, transport and export cocaine from Liberia to Europe. On September 25, Christian L. Nyantee participated in the Marshall landing-site casing with the network members responsible for receiving and transporting the US\$317 million narcotics. In May 2026, Christian L. Nyantee was photographed at Royesville with Tony (Zadereiko); he recruited police and transport support, and participated in the storage and movement of the cocaine later seized at Cement Road, VOA Community, Robertfield Highway, Montserrado County, Liberia. Defendant Christian L. Nyantee participated in aircraft, financial, security and transportation arrangements. Christian L. Nyantee handled the aircraft pilots and aircraft parking arrangements; he paid the first aircraft parking fee. Christian L. Nyantee was instructed to obtain and obtained police security for the transportation of the cocaine; paid Anthony T. Blaye and Kwarbo initial sums of US\$5,000.00 each. Christian L. Nyantee participated directly in the May 30 and May 31 cocaine transportation from Roysville to Cement Road, VOC Community, Paynesville, Robertsfield Highway, Montserrado County, Liberia.

25. **Christopher Saryee, also known as Chris-cee**, participated in the organization of the Royesville and VOA logistical operations resulting to the lease of the Royesville property in which the cocaine was stored and transported to Cement Road, VOA Community, Robertfied Highway, Montserrado County, Liberia. Saryee participated in the transportation of cocaine from Royesville; he paid approximately US\$14,500.00 for the VOA residence in which the cocained was stored and used the name Othello Taylor to disguise his name. Tony provided the finance and Christopher Saryee, Christian Nyantee, and Tony travel to Bong, Nimba, Margibi and Bassa to secure a farmland for landing of the aircraft. On August 25, 2025, Christopher Saryee arranged two hotel rooms for Michael and Tony through a US\$800.00 cash booking at Royal Grand Hotel, and led Michael, Tony and other operatives to land sites in several counties in search of a suitable landing site for the aircraft operation to import, transport, stored and export cocaine out of Liberia to Europe. He was photographed at the selected Royesville property with Tony during site preparation. Christopher Saryee, Jammel V. Jallah, Tony, Edison M. Brown, Mohammed Alpha Bah, Jammel V. Jallah, Christian Lucky Nyantee travelled to the Township of Royesville where they purchased and secured a parcel of land for US\$3,200.00 at **Harrisward Community** under the guise of doing fishing business, under the name *Liberty Fishery*, but the property was used to import, stored, transport and export cocaine from Liberia to Europe. In May 2026, Christopher Saryee drove a white vehicle during the river-to-road transportation of the cocaine from Royesville to Cement Road, VOA Community, Robertfield Highway, Montserrado County, Liberia; participated in the ground logistics, and helped move the cocaine from Royesville toward the Duazon residence.

26. **Caycee L. Nelson (known as Caycee or Casey Nelson)** was recruited to manage the purported aviation enterprise and participated in obtaining aviation and business documents from the LCAA. Caycee Nelson participated in meetings concerning the actual purpose of the aircraft, recruited Mark Kuiah concerning airport assistance for exportation of the cocaine, and participated in discussions concerning possible landing sites and cocaine transportation. Sometime early March 2026, Caycee Nelson participated

in a meeting that resulted to Jammel V. Jallah and Cayce Nelson travel to Maryland and Grand Kru to find suitable airfields for landing of the airplane. Caycee Nelson along with Christian L. Nyantee, Jammel V. Jallah, Edison M. Brown, Mohammed Alpha Bah, and Tony participated in another meeting that caused Christian L. Nyantee, Christopher Saryee, and Tony to travel to Bong, Nimba, Margibi and Bassa to secure farmland for landing of the aircraft. In furtherance of the cartel operations, Cayce Nelson, Jammel V. Jallah, Edison M. Brown, Mohammed Alpha Bah agreed to recruit personnel assigned at the RIA and NSA and Cayce Nelson recruited Mark Kuiah, former Deputy Director for Operations, RIA, who accepted to join the cartel trade. Mark Kuiah proposed US\$250,000.00 as compensation for his services, and Caycee Nelson gave him US\$50,000.00 in advance. Mark Kuiah recruited F. Augustine Claudius Tamba, Deputy Director General of LCAA, and Abner Wanah Yonly, Sr., Manager, James Spriggs Payne Airfield and Jammel V. Jallah gave them (1) cellphone each; while Mark Kuiah and Caycee Nelson received two (2) for Communication. Caycee Nelson along with Jammel V. Jallah, Edison M. Brown, Mohammed Alpha Bah, and Franklin Harberg participated in an introductory meeting at Kadi's Bar, Samuel Kanyon Doe Sports Complex, whierein Caycee Nelson was introduced as the Manager of the ariline business and Franklin Harberg as the Ground Hanlder. Caycee Nelson and Franklin Harberg visited the LCAA at RIA, Margibi County, to obtain license for the airline business and Edison M. Brown paid the application fee of US\$9,750.00 to the LCAA. Jammel V. Jallah gave Caycee Nelson US\$1,000.00 for the business registration and lawyer fees to develop the article of incorporation for "Afri-Connect Airlines".

27. *Between 2024-2025, Caycee Nelson served as the network Aircraft Manager, worked with airport official Mark Kuiah on approval and operational arrangements, and joined Jammel V. Jallah and Christian L. Nyantee in reconnaissance of airstrips in five counties.*

In 2015, Caycee Nelson issued operational-security questions concerning vehicle rebranding, the confirmed driver, and personnel available to receive the goods. Between 2025-May 2026, Caycee Nelson was photographed at the Roysville site with Zadereiko (Tony) and another network member, linking the aviation manager to the ground and coastal logistics site

28. **Dcp Anthony T. Blaye.** That in 2024, Srdan Seles, a Serbian national, Michael and Tom/Tony, including Edison M. Brown, Jammel V. Jallah, Mohammed Alpha Bah, Christian L. Nyantee and Caycee Nelson and others to be identified, imported into Liberia cocaine with an estimated street value of US\$317 million. The cocaine was imported into Libria via the sea and transported on canoes to a storage facility in Roysville, Montserrado County, Liberia. The storage facility was procured by the above-mentioned defendants. In order to transport the cocaine from the storage facility in Roysville to Cement Road, VOA Community, Paynesville, Robertsfield Highway, Montserrado County, Co-Defendant Christian L. Nyantee contacted Anthony T. Blaye, Chief of the Financial Crime Division, Liberia National Police (LNP), on Friday, May 29, 2026, and they agreed to meet on Friday, May 30, 2026. Accordingly, Christian L. Nyantee and Anthony T. Blaye at the Bomi-Monrovia Highway on Saturday, May 30, 2026 at about 3am, where they, in accordance with the plan, waited for Srdan Seles, Johann David Garces Grajales, Christopher Sayee and Sekou to be identified to come from inside Roysville. Srdan Seles, Johann David Garces Grajales, Christopher Sayee and Sekou came from Roysville Township between 5am-6am in a convoy of vehicles transporting the cocaine and Defendants *Anthony T. Blaye, Wadell W. Kwarbo and Albenigo Janior* joined the convoy. Defendants *Anthony T. Blaye, and Wadell W. Kwarbo* used their official assigned Liberia National Police (LNP) vehicles to escort and transport the cocaine from the Bomi-Monrovia Highway to Thinker Village, Paynesville, Robertsfield Highwhay, Montserrado County. While en route, Anthony T. Blaye, Wadell W. Kwarbo, Christian L.

Nyantee and Albenigo Janior stopped on the main street, around the Mega Mart, Thinkers Village, Paynesville, Robertsfield Highway, Montserrado County, and remained there until the Grey Nissan Van and the White Kia Truck containing the cocaine departed for their final destination at Cement Road, VOA Community, Paynesville, Roberts International Airport Highway. Thereafter, Anthony T. Blaye, Albenigo Janior, Christian L. Nyantee got onboard co-defendant Wadell W. Kwarbo Police marked car (RL-141) driven by him (Wadell W. Kwarbo) and proceeded to the Edward Beyan Kesselly Barrack (EBK) to meet Jammal V. Jallah, who, along with some NSA officers, was at the firing range. Christian Nyantee received a white envelope from Jammal V. Jallah containing US\$10,000.00 (Ten Thousand United States Dollars) and he gave US\$5,000.00 (Five Thousand United States Dollars) to defendant Anthony T. Blaye and gave US\$5,000.00 (Five Thousand United States Dollars) to defendant Wadell Kwarbo as compensation for the successful operation. From the EBK Barrack, Wadell W. Kwarbo, Christian L. Nyantee, Albenigo Janior, & Anthony T. Blaye, drove back to the Mega Mart area, where defendant Anthony T. Blaye parked his vehicle. Upon arrival at Mega Mart, Anthony T. Blaye disembarked the patrol car, boarded his Police assigned vehicle and left, while Wadell W. Kwarbo drove with Christian Nyantee and Albenigo Janior and dropped them off at ELWA Junction. Christian Nyantee and Albenigo Janior proceeded to Jammal V. Jallah's residence, where he (Christian L. Nyantee) gave US\$2,000.00 (Two Thousand United States Dollars) to Albenigo Janior based on Jammal V. Jallah's instruction. The US\$2,000.00 was Albenigo's compensation for successful execution of the operation.

29. **Madam Jewel Howard Taylor (Former Vice President of the Republic of Liberia)**-participated in the conspiracy from at least as early as 2021. In October 2021, Sheik Bashiru Kante introduced **MICHAEL** and **TONY** to Madan Jewel Howard-Taylor, at her Sophie Community Residence, Congo Town, Tubman Boulevard, Montserrado County, Liberia. In that meeting, Michael and Tony confirmed to Madam Taylor, in the presence of Sheik Bashiru Kante, that they were interested in doing business in Liberia and would like her to meet their boss in Dubai, United Arab Emirates (UAE). **Michael** averred that they wanted security protection from her to carry out their business in Liberia, and she agreed to provide them the required security protection. In November 2021, Madam Taylor headed a 5-man delegation including Sheik Bashiru Kante, Nowu Howard, Bernice Taylor, to Dubai, UAE which was facilitated by **MICHAEL** and **TONY**. During the November 2021 visit, **Nikolas, TONY and MICHAEL**, organized a meeting which was attended by Co-Defendants **Nikolas, Madam Jewel Howard-Taylor, Sheikh Bashiru Kante, Michael, Tony** and a person known as **Dejan** (a Russian National) at the H-Hotel, Trade Centre Roundabout, Sheikh Zayed Road, Dubai, United Arab Emirates (UAE), for the purpose of promoting, facilitating and organizing the illicit trafficking of drug through the Republic of Liberia. Nikolas recruited Co-Defendant Madam Jewel Howard Taylor at that meeting, to provide protection at a high governmental level for the illicit trafficking of cocaine through Liberia and promised that cocaine will be trafficked through Liberia but will not be sold, distributed, and used on the Liberian market, and that it will not be shipped to the United States of America (USA) or allies of the USA. **Nikolas** provided financial support to **Madam Jewel Howard-Taylor** and her Starfish Foundation, in the tune of approximately US\$75,000.00 in consideration for her protection of their drug trafficking enterprise.

30. That **Madam Jewel Howard Taylor** knowingly and purposefully conspired and agreed with **Nikolas Ivancic, Sheik Bashiru Kante, Michael and Tony and others** to use her position as Vice President of the Republic of Liberia to provide protection to the enterprise for their drug trafficking operation in Liberia which included the importation of drugs from outside of Liberia using canoes with the objective of using Liberia as the transit point to traffic and export narcotics to markets outside of Liberia. She agreed to the implementation of the plan to import, transport, store, export and traffic narcotics

and participated directly and indirectly by providing the high-level political assurance and cover needed by the cartel in the execution of the plan to traffic drugs. She participated in the narcotics enterprise, by providing or agreeing to provide aid, and support, that facilitated the cartel's operations and trafficking activities in Liberia.

31. That all times material to this Indictment, the Defendant, Madam Jewel Howard Taylor maintained contact with the cocaine-trafficking network, through Sheik Bashiru Kante concerning their arrangements with Nikola Ivancic, the Kingpin of the cocaine-trafficking network, and other persons associated with the alleged international cocaine-trafficking network. That on or about August 31, 2026, the Defendant transmitted WhatsApp audio messages to Sheik Bashiru Kante requesting that he communicate with Nikola Ivancic and other persons on her behalf to obtain financial assistance, and in one such communication identified as **"1_WhatsApp_Audio_2026-08-31_at_12.39.02,"** the Defendant stated, among other things:

"You know things are really crazy on our end to see if they can send me some more help. I really appreciate it."

32. Co-Defendant Jewel Howard Taylor further requested that Kante ask Nicholas Ivancic to send her assistance, stating:

"So please ask Nicholas if he could send me some help."

33. That during the subsequent conversation between the Co-Defendant Howard Taylor and Sheik Bashiru Kante, Madam Jewel Howard Taylor with knowledge and belief that the money she received had been sent to her from Nikola, the Kingpin of the cartel, acknowledged receipt of financial assistance in the amount of Fifteen Thousand United States Dollars (US\$15,000.00), stating:

"Thank you. Thank you. I've been turning around. I don't know where I would even get money for the other little boy's school fees."

34. That in another WhatsApp audio communication, identified as **"2_WhatsApp_Image_2026-08-31_at_12:39.21,"** the Defendant stated that she had been sending a message through Sheik Bashiru Kante and requested financial assistance for school expenses, stating:

"About 60,000.00 US will help me get everybody in school."

35. That on or about the same date, the Defendant transmitted another audio message, identified as **"3_WhatsApp_Audio_2026-08-31_at_12.39.57,"** thanking Kante for meeting with Nikola Ivancic and others and stating:

"I'm waiting for my boss to come back. He's in Ghana, and then he goes to Nigeria to speak at a bar conference. So, once he comes back, we sit."

36. That the said conversation further reflected that Kante discussed the amount of US\$15,000.00 and the Defendant acknowledged that amount and expressed appreciation for the financial assistance from the cartel. That in the same conversation, Kante conveyed information attributed to Nikola Ivancic concerning substantial losses allegedly suffered in Liberia, including a reference to "the 19 kilos" and an amount described in the conversation as "19 million or whatever that was." That Sheik Bashiru Kante further conveyed that Nikola was expecting goods from Sierra Leone to be moved to Liberia through his network, and during this conversation, the Defendant discussed the alleged losses and the movement of goods, including her statement:

"So maybe [they are] being hidden somewhere until a better time."

37. That these communications, considered together with the Defendant's prior alleged meetings with Nikola Ivancic, Mihovil Vrovac, Sheik Bashiru Kante, and other persons identified in this Indictment, are relevant to establishing the Defendant's knowledge of, relationship with, and alleged participation in the cocaine-trafficking network. That during the recorded conversation, the Defendant discussed financial assistance for political activities, including party conventions, campaign organization, transportation, campaign materials, and related expenditures. That the Defendant requested that Sheik Bashiru Kante communicate her financial needs to Nikola Ivancic and other persons and stated that she intended to discuss the arrangements with her political superior upon his return. The Defendant further discussed the provision of vehicles, campaign materials, cash, and other financial support, including the need to organize political activities across Liberia's fifteen counties. That during the conversation, the Defendant stated:

"We just need to do this thing the quiet way...that will make it easier to do."

38. That the Defendant also discussed the proposed use of financial resources in legitimate business arrangements, stating:

"Once you start from somewhere, you put it into legitimate business that you take it from one day."

39. That the foregoing statements, when considered with the other evidence concerning the alleged cocaine-trafficking network, are relevant to determining whether the Madam Taylor knowingly participated in arrangements involving the provision, receipt, concealment, or use of funds derived from unlawful activities. That the Defendant discussed the interests and expected returns of Sheik Bashiru Kante and other persons involved in the proposed financial arrangements, including a discussion concerning percentages and the assurance that the Defendant's share would be added to Sheik Bashiru Kante's share. That the Defendant stated:

"My percentage is set in stone. I'm not playing that game again."

40. That the Defendant further stated:

"I am adding mine to yours so how will you not get yours."

41. That the Republic relies upon these statements, together with the other evidence to be presented, as relevant to the alleged financial relationship and common arrangement among the persons identified in this Indictment. Furthermore, the 36. Defendant acknowledge, and believed that she had received financial assistance in the amount of US\$15,000.00 from the cartel through Sheik Bashiru Kante, which the Defendant acknowledged during the recorded conversation which confirmed her continued support, conspiracy and agreement with the cartel; the Defendant solicited additional financial assistance from Nikola Ivancic and persons associated with him, including a request for approximately US\$60,000.00 for educational expenses and subsequent requests for financial and political support. The Defendant knew or had reason to believe or suspect that such funds represented proceeds of crime and yet she accepted same. The Defendant's receipt, possession, use, transfer, or other handling of such funds is relied upon as conduct relevant to the offense of Money Laundering under *Section 15.2 of the Anti-Money Laundering, Terrorist Financing, Preventive Measures and Proceeds of Crimes Act, 2021*. Moreover, the Defendant's requests for financial assistance, her acknowledgment of receipt of funds, and her discussions concerning the anticipated

provision and allocation of additional funds constitute acts relevant to the alleged agreement and common design charged in this Indictment, when considered.

42. **Mark Kuiah.** Mark Kuiah former Deputy Director for Operations of the Liberia Civil Aviation Authority (LCAA), was recruited by Cayce Nelson. Mark Kuiah accepted to join the cartel trafficking enterprise and proposed US\$250,000.00 (Two Hundred Fifty Thousand United States Dollars) as compensation for his services. The proposed fee was accepted and the cartel paid him partial payment of US\$50,000.00 (Fifty Thousand United States Dollars). Mark Kuiah recruited F. Augustine Claudius Tamba, Deputy Director General of LCAA, and Abner Wanah Yonly, Sr., Manager, James Spriggs Payne Airfield and Jammel V. Jallah gave them (1) cellphone each; while Mark Kuiah and Caycee Nelson received two (2) for Communication.

That Chapter 10, Sub-chapter "D", Section 10.4(1)(2)(3)(4) of the Penal Code, Criminal Conspiracy provides that:

"Offense. A person is guilty of conspiracy to commit a crime if, with the purpose of promoting or facilitating its commission, he agrees with one or more persons to engage in or cause the performance of conduct which constitutes the crime, and any one or more of such persons does an act to effect the object of the conspiracy.

Scope of conspiratorial relationships. If a person knows that one with whom he agrees has agreed or will agree with another to effect the same objective, he shall be deemed to have agreed with the other, whether or not he knows the other's identity.

Conspiracy with multiple criminal objectives. If a person conspires to commit a number of crimes, he is guilty of only one conspiracy so long as such multiple crimes are the object of the same agreement or continuous conspiratorial relationship.

Duration of conspiracy. A conspiracy shall be deemed to continue until the crime which is its object is committed or the agreement that it is committed is abandoned by the defendant and by those with whom he conspired. A conspiracy shall be deemed to have been abandoned if no overt act to effect its objectives has been committed by any conspirator during the applicable period of limitations. If an individual abandons the agreement, the conspiracy is terminated as to him only if and when he timely advises those with whom he has agreed of his abandonment or by timely informing a law enforcement officer of the existence of the conspiracy.

Defense. It is an affirmative defense to a prosecution under this section that, if the criminal object were achieved, the defendant would not be guilty under the statute defining the offense or as an accomplice under section 3.1.

Defense precluded. It is no defense to a prosecution under this section that the person with whom such person is alleged to have conspired has been acquitted, has not been prosecuted or convicted, has been convicted of a different offense, is immune from prosecution, or for some other reason cannot be brought to justice.

Renunciation and withdrawal. It is an affirmative defense to a prosecution under this section that the defendant after agreeing with another that one or more of the conspirators will engage in criminal conduct, persuaded him or them not to engage in such conduct or otherwise prevented the commission of the crime under circumstances manifesting a voluntary and complete renunciation of his criminal intent. A renunciation is not "voluntary and complete" if it is motivated in whole or in part by (a) a belief that a circumstance exists which increases the probability of detection or apprehension of the defendant or another conspirator or which makes more difficult the consummation of the

crime, or (b) a decision to postpone the crime until another time or to substitute another victim or another but similar objective.

Liability as accomplice. Accomplice liability for offenses committed in furtherance of the conspiracy is to be determined as provided in section 3.1.

Grading. The penalties provided for criminal attempts in section 10.1 (4) shall be applicable to persons convicted of conspiracy.

That the crimes which are the object of the conspiracy was never abandoned and continued up to the time of the arrest of the defendants. That the conduct of you, the Defendants, is contrary to the **Statutory Law, Chapter 10, Section 10.4 of the Penal Law**, and against the peace and dignity of the Republic of Liberia.

THAT THE PLAINTIFF SAYS THAT THE DEFENDANTS HAVE NO AFFIRMATIVE DEFENSE IN THE PREMISES.

COUNT II:

**UNLICENSED IMPORTATION OF CONTROLLED DRUGS OR
SUBSTANCES (§14.83, Controlled Drugs & Substances Act, 2023)**

1. The General allegations section of this indictment is re-alleged and incorporated by reference as if fully set out herein.

2. The Special Grand Jurors re-allege Counts I of the Indictment above as though the averments contained therein are restated herein.

3. **THE SPECIAL GRAND JURY FOR MONTSERRADO COUNTY, REPUBLIC OF LIBERIA, UPON OATH, DO HEREBY FIND, MORE PROBABLY THAN NOT, THAT:** the Defendants, Nikola Ivancic, Tara Zadereiko, alias Tony; Mihovil Vrovac, alias Michael; Srdan Seles, Johann David Garc(E)S Grajales, Edison M. Brown, Mohammed Alpha Bah, Jammel V. Jallah, Christian L. Nyantee, Christopher Saryee, Madam Jewel Howard-Taylor and Albenigo Janior, acting individually and in concert with one another and with other persons known and unknown to the Grand Jury, purposely and knowingly participated in the **Unlicensed importation into the Republic of Liberia of controlled drugs or substances, namely cocaine, contrary to §14.83 of the Controlled Drugs and Substances Act of 2023.**

4. That during the relevant period preceding and including May 2026, the Defendants and their associates conspired, solicited, organized, facilitated, financed, received, concealed, and transported substantial quantities of cocaine brought into Liberia from outside its territorial boundaries by an unidentified vessel, without a license issued by the Minister of Health. That the imported cocaine was transferred from the vessel by canoe through the coastal waters of Liberia and the Po River, conveyed to a temporary storage location in Harris Ward Community, Royesville Township, Montserrado County, Republic of Liberia, and thereafter transported toward a compound situated along Cement Road, VOA Community, Paynesville, Robertsfield Highway, Montserrado County.

5. That the cocaine subsequently recovered from the VOA Community compound on July 21, 2026, by the Joint Special Investigation Team (JSIT), comprised approximately three thousand nine hundred seventy-one (3,971) bags, with an estimated street value of approximately three hundred seventeen million United States dollars (US\$317,000,000.00), subject to the laboratory reports, inventory, valuation, and chain-of-custody evidence to be produced at trial. That the Defendants' respective conduct, as particularized below, allegedly formed part of the arrangements by which the cocaine

was introduced into Liberia, received, protected, concealed, and moved within the Republic for the purpose of onward transportation and exportation.

6. That at all times material to this Count, the Defendants, acting individually and in concert with one another and with other persons known and unknown to the Grand Jurors, knowingly and purposely participated in an organized cocaine-trafficking enterprise whose object included the unlawful importation of cocaine into the Republic of Liberia for temporary storage, transportation, and subsequent exportation to Europe and other destinations. That the Defendants, without lawful authority or license issued by the Minister responsible under the Controlled Drugs and Substances Act, 2023, knowingly and purposely caused, facilitated, arranged, participated in, or aided the physical introduction of cocaine from outside the territorial jurisdiction of Liberia into Liberia.

7. That the cocaine was allegedly transported from an offshore vessel in the Atlantic Ocean, transferred to canoes, brought through the Po River to the shoreline at Royesville, Montserrado County, and landed at property acquired and maintained under the purported fishing-business name of Liberty Fishery, where the cocaine was stored pending further movement.

8. That the Royesville property was allegedly acquired and used as a receiving and storage location for cocaine imported into Liberia, and that the Defendants employed the fishing-business representation, fencing, security arrangements, transportation vehicles, and other logistical measures to conceal the true nature and purpose of the operation.

9. That the cocaine imported through the aforesaid operation was subsequently moved from Royesville toward Cement Road, VOA Community, Paynesville, Robertsville Highway, Montserrado County, Republic of Liberia, during the period of May 30 and May 31, 2026. That on July 21, 2026, at Cement Road, VOA Community, law enforcement officers recovered 3,971 plates of suspected cocaine contained in 157 bags, having an alleged estimated value of approximately US\$317,000,000.00, and arrested Defendants Srdan Seles and Johann David Garces Grajales in connection with the consignment.

10. That the acts of the Defendants described below were undertaken knowingly and purposely and formed part of the alleged common plan to bring cocaine into Liberia without the license required by law.

11. **Nikola Ivancic** was a foreign principal and organizer of the cocaine-trafficking enterprise, operating from Dubai and directing the activities of local operatives, including Defendants Mihovil Vrhovac alias MICHAEL and Taras Zadereiko alias TONY. That during a meeting in Dubai in or about November 2022, Defendant Nikola Ivancic allegedly disclosed that his organization produced and trafficked cocaine and intended to use Liberia as a transit point for cocaine destined for Europe and other destinations. That Defendant Nikola Ivancic allegedly directed or supported the establishment of the Liberian operational structure through which cocaine would be brought into Liberia, received, stored, transported, and subsequently exported.

12. That his direction of the enterprise, his communications with the Liberian operatives, and the stated objective of using Liberia as a cocaine transit point constitute the basis upon which the Grand Jurors allege that he knowingly and purposely participated in the unlawful importation charged herein.

13. **Taras Zadereiko, Alias Tony** acted as an operational participant in the cocaine-trafficking network and participated in arrangements for bringing cocaine into Liberia

and moving it to designated storage locations. That Defendant Taras Zadereiko participated in the acquisition and use of the Royesville property under the purported fishing-business cover of Liberty Fishery, which property was allegedly used to receive and store cocaine brought from offshore into Liberia. That Defendant Taras Zadereiko participated in the canoe-transport operation by which cocaine was allegedly transferred from an offshore vessel to the Liberian shoreline and brought to the Royesville property. That Defendant Zadereiko participated in meetings concerning cocaine transportation, storage, aviation arrangements, and landing locations, and allegedly directed the security convoy associated with the May 30, 2026 movement of cocaine from Royesville toward Cement Road, VOA Community, Paynesville, Robertsfield Highway, Montserrado County, Liberia.

14. That Co-Defendant **TONY** was photographed at the Royesville site with other alleged participants and was linked by physical and documentary evidence recovered from the property to equipment used in preparing and maintaining the premises.

15. That these acts, considered together with his alleged participation in the receiving-site operation, constitute the basis for charging him with knowingly and purposely participating in the importation of cocaine into Liberia.

16. **Mihovil Vrovac, Alias Michael** participated with Defendant **TONY** and other members of the network in arrangements to bring cocaine into Liberia and establish locations for its temporary storage. That Defendant **MICHAEL** participated in the May 30, 2026 transportation of cocaine from Royesville through Vincent Town toward the VOA Community compound; that he travelled with other participants in the vehicles conveying the cocaine and participated in directing the security escort to disengage before the vehicles proceeded to the designated compound. That the Republic alleges that Defendant Mihovil Vrovac knowingly participated in the receipt, transportation, and concealment of cocaine introduced into Liberia without lawful authorization.

17. That Co-Defendant **MICHAEL** was an alleged foreign operational coordinator who participated in planning the importation, transportation, and exportation of cocaine through Liberia. That on July 31, 2025, Defendant **MICHAEL** allegedly presented a plan for the use of aviation arrangements as cover for narcotics movements into and out of Liberia and discussed the use of maritime intelligence in connection with the cocaine operation.

18. That in September 2025, Co-Defendant **MICHAEL** was allegedly taken to a proposed landing location at Marshall, where members of the enterprise examined the site, obtained positional information, and transmitted coordinates for approval of its use as a cocaine receiving location. That in May 2026, Co-Defendant **MICHAEL** allegedly participated with members of the foreign group connected to the Royesville cover and the canoe operation for bringing cocaine from the Po River receiving point into Liberia.

19. That his alleged planning of receiving locations, participation in the Royesville operation, and coordination with the foreign command constitute the basis for alleging his knowing and purposeful participation in the importation charged herein.

20. **Srdan Seles** physically participated in the unloading of the cocaine at Royesville, Montserrado County, Republic of Liberia, after its transfer from an offshore vessel to canoes and delivery to the Liberian shoreline. That Defendant Srdan Seles thereafter drove the Grey Nissan Van used in transporting the cocaine from Royesville toward Cement Road, VOA Community, Paynesville, Robertsfield Highway, during the May 2026 operation. That on July 21, 2026, Defendant Srdan Seles was arrested with Defendant Johann David Garces Grajales at Cement Road, VOA Community, where 3,971 plates of

cocaine in 157 bags, with an alleged estimated value of US\$317,000,000.00, were recovered.

21. That Defendant **Srdan Seles's** alleged physical participation in unloading the cocaine at the receiving site, his operation of the vehicle used in the subsequent movement, and *his alleged continued involvement with the consignment constitute the basis for charging him with knowing and purposeful participation in the importation of cocaine into Liberia.*

22. **Johann David Garces Grajales** participated in the alleged cocaine operation and was present in connection with the movement of cocaine from Royesville, Montserrado County, toward Cement Road, VOA Community, Paynesville, Robertsfield Highway, Montserrado County, in May 2026. Defendant Garces Grajales participated in the operation associated with the receiving, handling, and transportation of the cocaine from the Royesville location. On July 21, 2026, Defendant Garces Grajales was arrested with Defendant Srdan Seles at Cement Road, VOA Community, in connection with the 3,971 plates of cocaine contained in 157 bags and estimated to be worth US\$317,000,000.00.

23. That his alleged participation in the Royesville-to-VOA operation and his arrest in connection with the cocaine consignment constitute the basis for alleging his knowing and purposeful participation in the importation charged herein.

24. **Edison M. Brown** provided commercial, financial, logistical, and business infrastructure to the cocaine enterprise through Brown's Trucking Handling Services Enterprise and related arrangements. Defendant Edison M Brown participated in the establishment of the enterprise's aviation and transportation structure, including the financing and facilitation of aircraft entry, parking, licensing, and the purported charter-flight business. That Defendant **Edison M. Brown** participated in meetings and arrangements concerning the identification of landing locations and the recruitment of persons to facilitate the movement of cocaine through Liberia.

25. Defendant **Edison M. Brown** participated with other Defendants in acquiring and securing the Royesville property under the Liberty Fishery cover, which was used as a receiving and storage location for cocaine brought into Liberia.

26. That his alleged participation in establishing the receiving and logistical infrastructure, financing the operation, and securing the Royesville property constitutes the basis for alleging that he knowingly and purposely facilitated and participated in the importation of cocaine into Liberia.

27. **Mohammed Alpha Bah** participated in the cocaine enterprise's aviation, financial, and logistical arrangements. Defendant **Mohammed Alpha Bah** participated in meetings concerning the use of an aircraft as cover for narcotics movements and was allegedly present in connection with reconnaissance of proposed cocaine landing locations. That cell-site evidence placed Defendant Mohammed Alpha Bah at the Marshall landing-site reconnaissance, and financial records described in the investigation link him to payments and logistical arrangements associated with the enterprise.

28. That Defendant **Mohammed Alpha Bah** participated with other Defendants in securing the Royesville property under the purported fishing-business cover and in the transportation of cocaine from Royesville toward Cement Road, VOA Community, Paynesville, Robertsfield Highway, Montserrado County, Liberia.

That these acts constitute the basis for alleging his knowing and purposeful participation in the importation of cocaine into Liberia.

29. **Jammel V. Jallah** participated in the enterprise's aviation, security, financial, and narcotics-logistics structure. Defendant Jammel V. Jallah allegedly learned that the aircraft and related commercial arrangements were intended to facilitate the movement of drugs through Liberia and thereafter participated in recruiting persons to assist the operation. That Defendant **Jammel V. Jallah** participated in meetings concerning proposed landing sites for cocaine consignments and allegedly provided financial support for reconnaissance and operational arrangements. Defendant Jammel V. Jallah participated in acquiring and securing the Royesville property for use as a cocaine receiving and storage location. That in connection with the May 30, 2026 operation, Defendant Jammel V. Jallah directed Defendant Christian L. Nyantee to obtain security escorts for the cocaine movement and provided funds for the participating security personnel. That following the convoy operation, Defendant Jammel V. Jallah delivered US\$10,000.00 to Defendant Nyantee for distribution to Anthony T. Blaye and Wedell W. Kwarbo who had provided security assistance for the transportation of the cocaine to avoid security inspection.

30. That Defendant Jammel V. Jallah alleged participation in the receiving-site arrangements, operational planning, financing, and coordination of the cocaine movement constitutes the basis for alleging his knowing and purposeful participation in the importation charged herein.

31. **Christian L. Nyantee** participated in the enterprise's aviation, financial, security, and transportation arrangements. Defendant Christian L. Nyantee participated in the acquisition and use of the Royesville property and was photographed there with other alleged members of the enterprise. Defendant Christian L. Nyantee participated in arrangements for the receiving and transportation of cocaine and was instructed to secure security escorts for the movement of cocaine from Royesville. That on May 29, 2026, Defendant Christian L. Nyantee contacted Defendants Anthony T. Blaye, Wadell W. Kwarbo, and Albenigo Janior to arrange security escort for the cocaine movement scheduled for May 30, 2026 and Co-defendants Anthony T. Blaye and Wedell W. Kwarbo provided security escort for the transportation for the cocaine.

32. That on May 30, 2026, Defendant **Christian L. Nyantee** met the security personnel at approximately 3:00 a.m. on the Bomi-Monrovia Highway and participated in coordinating the convoy that arrived from Royesville between approximately 5:00 a.m. and 6:00 a.m. That Defendant Christian L. Nyantee thereafter received US\$10,000.00 from Defendant Jammel V. Jallah and distributed US\$5,000.00 each to Defendants Anthony T. Blaye and Wedell W. Kwarbo, and subsequently delivered US\$2,000.00 to Defendant Abenigo Janior on Defendant Jammel V. Jallah's instruction.

33. That Defendant Nyantee's alleged participation in the Royesville receiving operation, his arrangements for security and transportation, and his role in the May 30, 2026, operation constitute the basis for alleging his knowing and purposeful participation in the importation of cocaine into Liberia.

34. **Christopher Saryee**, also known as Chris-cee, participated in the organization of the Royesville and VOA logistical operations, and securing the Royesville property used to receive and store cocaine imported into Liberia. That during the May 2026 operation, Defendant Christopher Saryee allegedly participated in the ground transportation of cocaine from the Royesville receiving location toward Cement Road, VOA Community, Paynesville, Robertsfield Highway, Montserrado County, Liberia, including the river-to-road movement. That Defendant Christopher Saryee drove a vehicle used in the transportation operation and participated in arrangements concerning the VOA residence used in connection with the cocaine operation.

35. That Defendant Christopher Saryee's participation in the receiving-site arrangements and movement of the cocaine constitutes the basis for alleging his knowing and purposeful participation in the importation charged herein.

36. **Cayce L. Nelson** recruited to manage the purported aviation enterprise and participated in obtaining aviation and business documentation from the Liberia Civil Aviation Authority (LCAA) for the operation. That Defendant Caycee L. Nelson participated in discussions concerning the actual purpose of the aircraft, contacted airport personnel for operational assistance, and was informed that the aircraft was intended to facilitate the importation, transportation and movement of drugs through Liberia. Defendant Caycee L. Nelson participated in discussions and reconnaissance concerning potential landing sites for cocaine consignments and was allegedly involved in the operational arrangements connecting the aviation structure to the ground and coastal logistics operation. Defendant Caycee L. Nelson was photographed at the Royesville site with Defendant Taras Zadereiko and another alleged member of the enterprise.

37. That these acts constitute the basis for alleging Defendant Caycee L. Nelson's knowing and purposeful participation in the importation operation.

38. **Anthony T. Blaye**, an officer of the Liberia National Police, was contacted by Defendant Christian L. Nyantee on May 29, 2026, to provide security escort for the transportation of cocaine from Royesville toward Cement Road, VOA Community, Paynesville, Robertsfield Highway, Montserrado County, Liberia. That on May 30, 2026, Defendant Anthony T. Blaye met Defendant Christian L. Nyantee at approximately 3:00 a.m. on the Bomi-Monrovia Highway and joined the convoy after the cocaine-laden vehicles arrived from Royesville. Defendant Anthony T. Blaye used his assigned police vehicle to escort the cocaine convoy toward Thinkers Village and remained with the security operation until the vehicles carrying the cocaine proceeded toward the VOA Community. That Defendant Anthony T. Blaye thereafter received US\$5,000.00 as compensation for the operation.

39. That the foregoing conduct is alleged as evidence of Defendant Blaye's knowing and purposeful participation in the common cocaine enterprise and its importation operation. The Grand Jurors further allege that his agreed security assistance was intended to facilitate the safe receipt and movement of cocaine brought into Liberia.

40. **Wadell W. Kwarbo**, an officer of the Liberia National Police, was also contacted by Defendant Christian L. Nyantee on May 29, 2026, to provide security escort for the cocaine movement from Royesville toward Cement Road, VOA Community. That on May 30, 2026, Defendant Kwarbo allegedly met Defendant Christian L. Nyantee at approximately 3:00 a.m. on the Bomi-Monrovia Highway and joined the convoy after the cocaine-laden vehicles emerged from Royesville. That Defendant Wadell W. Kwarbo used his assigned police vehicle, bearing identification RL-141, to escort the convoy toward Thinkers Village and remained with the operation until the vehicles carrying cocaine proceeded toward the VOA Community. That Defendant Wadell W. Kwarbo thereafter allegedly transported Defendant Christian L. Nyantee and other participants to meet Defendant Jammal V. Jallah and received US\$5,000.00 as compensation for the operation.

41. That the foregoing conduct is evidence of Defendant Wadell W. Kwarbo's knowing and purposeful participation in the common cocaine enterprise and its importation operation, including the provision of security intended to facilitate the receipt and movement of cocaine brought into Liberia.

42. **Albenigo Janior**, a member of the National Security Agency (NSA), was contacted by Defendant Christian L. Nyantee on May 29, 2026, to participate in security

arrangements for the cocaine movement from Royesville. That on May 30, 2026, Defendant Abenigo Janior allegedly met Defendant Christian L. Nyantee at approximately 3:00 a.m. on the Bomi-Monrovia Highway and joined the convoy after the cocaine-laden vehicles emerged from Royesville. That Defendant Abenigo Janior participated in the security and logistical operation and remained with the other participants at the Mega Mart area while the Grey Nissan Van and White Kia Truck containing cocaine proceeded toward Cement Road, VOA Community. That Defendant Abenigo Janior thereafter received US\$2,000.00 from Defendant Christian L. Nyantee on the instruction of Defendant Jammal V. Jallah as compensation for the operation.

43. That these acts are alleged as evidence of Defendant Abenigo Janior's knowing and purposeful participation in the common cocaine enterprise and its importation operation, as he knew the cargo was cocaine and that his agreed assistance furthered the unlawful importation.

44. **Gerald Folley Smith**, former Deputy Director for Operations, National Security Agency (NSA), agreed to provide security protection for the cocaine enterprise and, after learning the true nature of the operation, knowingly assigned security personnel to facilitate the importation and transportation of cocaine into and out of Liberia. That Defendant Gerald F. Smith arranged security escorts for the transportation and shipment of controlled substances and received compensation in connection with the security services. That Defendant Gerald F. Smith's security arrangements were intended to protect and facilitate the enterprise's cocaine operations, including the receipt and subsequent movement of cocaine within Liberia.

45. That the foregoing conduct is evidence of Defendant Gerald F. Smith's knowing and purposeful participation in the common plan to import cocaine into Liberia.

46. **Sheik Bashiru Kante** introduced Defendants Taras Zadereiko and Mihovil Vrhovac to persons in Liberia who could provide security and operational support for their cocaine-trafficking activities. That Defendant Sheik Bashiru Kante participated in meetings at which the foreign principals disclosed that their business involved cocaine and that Liberia would be used as a transit point for cocaine destined for Europe and other destinations. That Defendant Sheik Bashiru Kante facilitated the introduction of commercial and logistical actors into the enterprise and participated in arrangements for the movement and exportation of cocaine through Liberia.

47. That these acts are alleged as evidence of his knowing and purposeful participation in the common plan to import cocaine into Liberia.

48. **Madam Jewel Howard Taylor (Former Vice President of the Republic of Liberia)**-participated in the conspiracy from at least as early as October 2021. In October 2021, Sheik Bashiru Kante introduced **MICHAEL** and **TONY** to Madam Jewel Howard-Taylor, at her Sophie Community Residence, Congo Town, Tubman Boulevard, Montserrado County, Liberia. In that meeting, Michael and Tony confirmed to Madam Taylor, in the presence of Sheik Bashiru Kante, that they were interested in doing business in Liberia and would like her to meet their boss in Dubai, United Arab Emirates (UAE). **Michael** averred that they wanted security protection from her to carry out their business in Liberia, and she agreed to provide them the required security protection. In November 2021, Madam Taylor headed a 5-man delegation including Sheik Bashiru Kante, Nowu Howard, Bernice Taylor, to Dubai, UAE which was facilitated by **MICHAEL** and **TONY**. During the November 2021 visit, **Nicolas, TONY and MICHAEL**, organized a meeting which was attended by Co-Defendants **Nicolas, Madam Jewel Howard-Taylor, Sheikh Bashiru Kante, Michael, Tony** and a person known as **Dejan** (a Russian National) at the H-Hotel, Trade Centre Roundabout, Sheikh Zayed Road, Dubai, United Arab Emirates

(UAE), for the purpose of promoting, facilitating and organizing the illicit trafficking of drug through the Republic of Liberia. Nikolas recruited Co-Defendant Madam Jewel Howard Taylor at that meeting, to provide protection at a high governmental level for the illicit trafficking of cocaine through Liberia and promised that cocaine will be trafficked through Liberia but will not be sold, distributed, and used on the Liberian market, and that it will not be shipped to the United States of America (USA) or allies of the USA. **Nikolas** provided financial support to **Madam Jewel Howard-Taylor** and her Starfish Foundation, in the tune of approximately US\$75,000.00 in consideration for her protection of their drug trafficking enterprise.

49. She conspired and agreed with Nikolas Ivancic, Sheik Bashiru Kante, Michael and Tony and others to use her position as Vice President of the Republic of Liberia to provide protection to the enterprise for their illicit drug trafficking operations in Liberia, which included the importation of drugs from location outside of Liberia and using Liberia as the transit point to export and illicitly traffic narcotics to other markets. She agreed to the implementation of the plan to traffic narcotics and participated directly and indirectly by providing the high-level political and security assurance and cover needed by the cartel in the execution of the plan to traffic drugs.

50. That all times material to this Indictment, the Defendant, Madam Jewel Howard Taylor maintained contact with the cocaine-trafficking network, through Sheik Bashiru Kante concerning their arrangements with Nikola Ivancic, the Kingpin of the cocaine-trafficking network, and other persons associated with the alleged international cocaine-trafficking network. That on or about August 31, 2026, the Defendant transmitted WhatsApp audio messages to Sheik Bashiru Kante requesting that he communicate with Nikola Ivancic and other persons on her behalf to obtain financial assistance, and in one such communication identified as **"1_WhatsApp_Audio_2026-08-31_at_12.39.02,"** the Defendant stated, among other things:

"You know things are really crazy on our end to see if they can send me some more help. I really appreciate it."

51. Co-Defendant Jewel Howard Taylor further requested that Kante ask Nicholas Ivancic to send her assistance, stating:

"So please ask Nicholas if he could send me some help."

52. That during the subsequent conversation between the Co-Defendant Howard Taylor and Sheik Bashiru Kante, Madam Jewel Howard Taylor with knowledge and belief that the money she received had been sent to her from Nikolas, the Kingpin of the cartel, acknowledged receipt of financial assistance in the amount of Fifteen Thousand United States Dollars (US\$15,000.00), stating:

"Thank you. Thank you. I've been turning around. I don't know where I would even get money for the other little boy's school fees."

53. That in another WhatsApp audio communication, identified as **"2_WhatsApp_Image_2026-08-31_at_12:39.21,"** the Defendant stated that she had been sending a message through Sheik Bashiru Kante and requested financial assistance for school expenses, stating:

"About 60,000.00 US will help me get everybody in school."

54. That on or about the same date, the Defendant transmitted another audio message, identified as **"3_WhatsApp_Audio_2026-08-31_at_12.39.57,"** thanking Kante for meeting with Nikola Ivancic and others and stating:

"I'm waiting for my boss to come back. He's in Ghana, and then he goes to Nigeria to speak at a bar conference. So, once he comes back, we sit."

55. That the said conversation further reflected that Kante discussed the amount of US\$15,000.00 and the Defendant acknowledged that amount and expressed appreciation for the financial assistance from the cartel. That in the same conversation, Kante conveyed information attributed to Nikola Ivancic concerning substantial losses allegedly suffered in Liberia, including a reference to "the 19 kilos" and an amount described in the conversation as "19 million or whatever that was." That Sheik Bashiru Kante further conveyed that Nikola was expecting goods from Sierra Leone to be moved to Liberia through his network, and during this conversation, the Defendant discussed the alleged losses and the movement of goods, including her statement:

"So maybe [they are] being hidden somewhere until a better time."

56. That these communications, considered together with the Defendant's prior alleged meetings with Nikola Ivancic, Mihovil Vrovac, Sheik Bashiru Kante, and other persons identified in this Indictment, are relevant to establishing the Defendant's knowledge of, relationship with, and alleged participation in the cocaine-trafficking network. That during the recorded conversation, the Defendant discussed financial assistance for political activities, including party conventions, campaign organization, transportation, campaign materials, and related expenditures. That the Defendant requested that Sheik Bashiru Kante communicate her financial needs to Nikola Ivancic and other persons and stated that she intended to discuss the arrangements with her political superior upon his return. The Defendant further discussed the provision of vehicles, campaign materials, cash, and other financial support, including the need to organize political activities across Liberia's fifteen counties. That during the conversation, the Defendant stated:

"We just need to do this thing the quiet way...that will make it easier to do."

57. That the Defendant also discussed the proposed use of financial resources in legitimate business arrangements, stating:

"Once you start from somewhere, you put it into legitimate business that you take it from one day."

58. That the foregoing statements, when considered with the other evidence concerning the alleged cocaine-trafficking network, are relevant to determining whether the Madam Taylor knowingly participated in arrangements involving the provision, receipt, concealment, or use of funds derived from unlawful activities. That the Defendant discussed the interests and expected returns of Sheik Bashiru Kante and other persons involved in the proposed financial arrangements, including a discussion concerning percentages and the assurance that the Defendant's share would be added to Sheik Bashiru Kante's share. That the Defendant stated:

"My percentage is set in stone. I'm not playing that game again."

59. That the Defendant further stated:

"I am adding mine to yours so how will you not get yours."

60. That the Republic relies upon these statements, together with the other evidence to be presented, as relevant to the alleged financial relationship and common arrangement among the persons identified in this Indictment. Furthermore, the

Defendant acknowledged, and believed that she had received financial assistance in the amount of US\$15,000.00 from the cartel through Sheik Bashiru Kante, which the Defendant acknowledged during the recorded conversation which confirmed her continued support, conspiracy and agreement with the cartel; the Defendant solicited additional financial assistance from Nikola Ivancic and persons associated with him, including a request for approximately US\$60,000.00 for educational expenses and subsequent requests for financial and political support. The Defendant knew or had reason to believe or suspect that such funds represented proceeds of crime and yet she accepted same. The Defendant's receipt, possession, use, transfer, or other handling of such funds is relied upon as conduct relevant to the offense of Money Laundering under *Section 15.2 of the Anti-Money Laundering, Terrorist Financing, Preventive Measures and Proceeds of Crimes Act, 2021*. Moreover, the Defendant's requests for financial assistance, her acknowledgment of receipt of funds, and her discussions concerning the anticipated provision and allocation of additional funds constitute acts relevant to the alleged agreement and common design charged in this Indictment, when considered.

61. **Mark Kuiah.** Mark Kuiah former Deputy Director for Operations of the Liberia Civil Aviation Authority (LCAA), was recruited by Cayce Nelson. Mark Kuiah accepted to join the cartel trafficking enterprise and proposed US\$250,000.00 (Two Hundred Fifty Thousand United States Dollars) as compensation for his services. The proposed fee was accepted and the cartel paid him partial payment of US\$50,000.00 (Fifty Thousand United States Dollars). Mark Kuiah recruited F. Augustine Claudius Tamba, Deputy Director General of LCAA, and Abner Wanah Yonly, Sr., Manager, James Spriggs Payne Airfield and Jammell V. Jallah gave them (1) cellphone each; while Mark Kuiah and Caycee Nelson received two (2) for Communication. Mark Kuiah knew and had reasons to know that the cartel trafficking trade was to import cocaine into Liberia for storage, transportation and exportation out of Liberia to Europe and other destinations and accepted to provide the required assistance for the agreed fee of US\$250,000.00.

62. **Sekou**, true name and identity to be ascertained, participated in the Royesville receiving and transportation operation. That on May 30, 2026, Sekou emerged from the Royesville location with Defendants Srdan Seles, Johann David Garces Grajales, and Christopher Saryee in the convoy transporting cocaine toward Monrovia. That Sekou's participation in the movement of cocaine from the receiving location is relied upon as evidence of his participation in the common importation operation, subject to proper identification and proof of his knowledge and intent.

That Chapter 14 Subchapter E, Section 14.83 – Un-licensed Importation of Controlled Drugs or Substances provides that:

1. **“Offense:** A person commits an offense if he/she purposely or knowingly imports into Liberia any controlled drugs or substances listed in Schedules I, II, III, IV, or precursor or essential chemical listed in table I and Table II and contained in the annex to this subchapter without a license from the Minister.
2. **Grading:** The offense of unlicensed importing of controlled drug or substances shall be graded as follows:
 - a. Where the subject matter of the offense is a drug or substances listed in schedule I, or precursor or essential chemical listed in Table I and Table II to be used for the purpose of trafficking, the person shall be guilty of a felony of the first degree and, if used otherwise, shall be guilty of a second-degree felony and shall serve a sentence between 10 to 20 years as prescribed in section 50.5 and 50.6 of the penal Law of Liberia. Where the offense is deemed a first-degree felony, it shall be a grave offense and

shall not be billable. Where the offense is deemed second degree felony, for the purpose of bail, only cash to the value of twice the bond; or cash deposit in the bank to the value of twice the bond as evidenced by a bank certificate.

- b. Where the subject matter of the offense is a drug or substances listed in schedule II, III and IV to be used for the purpose of trafficking, the person shall be guilty of a second-degree felony and if used otherwise, shall be guilty of a first-degree misdemeanor. Punishment shall range between three (3) to five (5) years or more depending on the circumstances or as prescribed in section 50.5 and 50.6 of the penal Law of Liberia. As to the matter of bail, only cash to the value of the bond; or cash deposit in the bank to the value of the bond as evidenced by a bank certificate''.

THAT THE PLAINTIFF SAYS THAT THE DEFENDANTS HAVE NO AFFIRMATIVE DEFENSE IN THE PREMISES.

COUNT III

**UNLICENSED SALE, TRADING, ADMINISTRATION,
DISPENSATION, DELIVERY, DISTRIBUTION, DISPATCH IN
TRANSIT AND TRANSPORTATION OF CONTROLLED DRUGS OR
SUBSTANCES (§14.85, Controlled Drugs and Substances Act of 2023)**

1. The General allegations section of this indictment is re-alleged and incorporated by reference as if fully set out herein.
2. The Special Grand Jurors re-allege Counts I of the Indictment above as though the averments contained therein are restated herein.
3. **THE SPECIAL GRAND JURY FOR MONTSERRADO COUNTY, REPUBLIC OF LIBERIA, UPON OATH, DO HEREBY FIND, MORE PROBABLY THAN NOT, THAT :** the Defendants, *Nikola Ivancic, Tara Zadereiko, alias Tony; Mihovil Vrovac, alias Michael; Srdan Seles, Johann David Garc(E)S Grajales, Edison M. Brown, Mohammed Alpha Bah, Jammell V. Jallah, Christian L. Nyantee, Christopher Saryee, Anthony T. Blaye, Wadell W. Kwarbo, Albenigo Junior and Madam Jewel Howard-Taylor*, acting individually and in concert with one another and with other persons known and unknown to the Grand Jury, purposely and/or knowingly participated in the **unlicensed distribution, dispatch in transit, and transportation of of controlled drugs or substances, namely cocaine, contrary to §14.85 of the Controlled Drugs and Substances Act of 2023.**
4. **Nikola Ivancic**, acting as a principal organizer of the alleged transnational narcotics operation, authorized, coordinated, and supported the movement of cocaine into Liberia, its storage at Royesville, and its subsequent transportation toward Cement Road, VOA Community, for onward movement to foreign destinations. He participated in the organization of the foreign operational structure responsible for arranging the landing, transportation, and exportation of cocaine through Liberia and provided the authority and support under which the *Tara Zadereiko, alias Tony; Mihovil Vrovac, alias Michael; Srdan Seles, Johann David Garc(E)S Grajales, Edison M. Brown, Mohammed Alpha Bah, Jammell V. Jallah, Christian L. Nyantee, Christopher Saryee, Anthony T. Blaye, Wadell W. Kwarbo, Albenigo Junior and Madam Jewel Howard-Taylor* carried out the operation.
5. **Taras Zadereiko**, commonly called "**TONY**", participated in the acquisition and preparation of the Royesville property as a storage location for cocaine and in the operational arrangements for transporting cocaine from that location toward Cement Road, VOA Community. On May 30, 2026, he participated in the movement of cocaine

from Royesville and, together with Mihovil Vrhovac, directed the security escort to disengage near Mega Mart while the vehicles carrying cocaine proceeded toward their designated destination. He also participated in the movement of another cocaine consignment on May 31, 2026.

6. **Mihovil Vrhovac**, commonly called "Michael" participated in planning and coordinating the movement of narcotics through Liberia, including the use of aviation and maritime arrangements for the importation, transportation, and onward exportation of cocaine. On July 31, 2025, he allegedly presented a roadmap for air-transport cover involving narcotics and discussed the gathering of maritime intelligence. He further offered encrypted communications equipment to evade detection by law enforcement. In May 2026, he participated in the operation involving the Royesville receiving point and the transportation of cocaine from the Po River area.

7. **Srdan Seles** physically participated in unloading cocaine at Royesville in May 2026 and thereafter drove the Grey Nissan Van used to transport the cocaine from Royesville toward Cement Road, VOA Community, Montserrado County. His acts included handling, loading, transporting, and moving the cocaine from the receiving and storage location toward its designated destination.

8. **Johann David Gracies Grajales** participated in the operational movement of cocaine from the Royesville area toward Cement Road, VOA Community, and was identified among the persons associated with the May 30, 2026, convoy. On July 21, 2026, Johann David Garces Grajales was arrested with Srdan Seles in connection with the cocaine recovered at Cement Road, VOA Community.

9. **Edison M. Brown** participated in the logistical and commercial arrangements through which cocaine was allegedly transported, stored, and prepared for onward movement from Liberia. He participated in the acquisition and securing of the Royesville property and in the establishment of aviation and commercial shipment arrangements intended to facilitate the movement of narcotics under the cover of legitimate business activities. Edison M. Brown participation in an earlier Freeport container operation involving the removal of thirty-two brown rectangular cartons from a 40-foot container and their transfer to a truck.

10. **Mohammed Alpha Bah** participated in the aviation and logistical arrangements of the alleged cocaine operation and in the transportation of cocaine from Royesville toward Cement Road, VOA Community. On May 31, 2026, he allegedly joined a cocaine movement at Duala, Bushrod Island, and participated in the transportation of another consignment from Royesville toward Cement Road, VOA Community.

11. **Jammel V. Jallah** participated in the security, aviation, and narcotics logistics structure and directed Christian L. Nyantee to secure police escort for the movement of cocaine from Royesville toward Cement Road, VOA Community. He provided US\$10,000.00 to Christian L. Nyantee for distribution to the two police officers, Anthony T. Blaye and Wadell W. Kwarbo, who provided security escort and participated in the May 2026 cocaine transportation operation.

12. **Christian L. Nyantee** coordinated the transportation of cocaine from Royesville toward Cement Road, VOA Community. On May 29, 2026, he contacted Anthony T. Blaye, Wadell W. Kwarbo, and Albenigo Janior to secure security escort for the cocaine movement. On May 30, 2026, he met the escort participants, coordinated the convoy, and received US\$10,000.00 from Jammel V. Jallah for distribution to Anthony T. Blaye and Wadell W. Kwarbo. He participated in the movement of another consignment on May 31, 2026.

13. **Christopher Saryee**, also known as Chris-cee, participated in the acquisition and securing of the Royesville premises and in the movement of cocaine from Royesville toward Cement Road, VOA Community. On May 30, 2026, he emerged from Royesville in the convoy transporting cocaine and participated in the May 31 movement of another consignment. Christopher Saryee rented the Cement Road, VOA Community residence used as a destination for the cocaine movement, paying US\$14,500.00 for a one-year rent while using the name Othello Taylor.

14. **Caycee Nelson** participated in the aviation and logistics structure established under the purported commercial name "Afri-Connect Airlines". He recruited Mark Egon Kuiah, *Deputy Manager for Operations at Roberts International Airport*, to facilitate movement of purported mineral cargo through the airport, while the alleged actual purpose of the operation was to facilitate narcotics movement.

15. **Anthony T. Blaye**, on May 30, 2026, knowingly participated in escorting vehicles transporting cocaine from Royesville toward Thinkers Village and the Cement Road area. He allegedly used his assigned Liberia National Police vehicle to provide security escort for the Grey Nissan Van and White Kia Truck conveying cocaine. After the convoy reached the Mega Mart area, he allegedly disengaged from the escort while the vehicles carrying cocaine proceeded toward Cement Road, VOA Community.

16. **Wadell W. Kwarbo**, on May 30, 2026, knowingly participated in the transportation of cocaine by providing security escort using his assigned police vehicle, bearing registration RL-141. He allegedly joined the convoy transporting cocaine from the Bomi-Monrovia Highway toward Thinkers Village and thereafter proceeded with other participants to the Edward Beyan Kesselly Barracks.

17. **Albenigo Janior** agreed to participate in the security and transportation operation involving cocaine from Royesville toward Thinkers Village. On May 30, 2026, he met Christian L Nyantee and the police officers, Anthony T. Blaye and Wadell W. Kwarbo, joined the convoy, and participated in the security arrangements for the cocaine movement.

18. **Gerald Folley Smith** agreed to provide security protection for the movement of cocaine upon its arrival in Liberia and during its alleged loading into containers among legitimate commodities for onward exportation. He assigned agents of the National Security Agency (NSA) to provide security protections for the dispatch in transit and transporation of cocaine.

19. **Sheik Bashiru Kante** participated in the commercial and logistical arrangements through which cocaine was transported and exported from Liberia under the cover of legitimate commodity shipments. He allegedly connected foreign participants with Liberian business and logistics operators and participated in arrangements involving cocoa, bauxite, and other commodities intended to provide cover for the movement of cocaine.

20. **Jewel Howard Taylor** knowingly participated in the alleged narcotics enterprise by providing or agreeing to provide assistance, support, to facilitate the trafficking activities. She conspired and agreed with **Nikolas Ivancic**, **Sheik Bashiru Kante**, **Michael** and **Tony** to use her position as Vice President of the Republic of Liberia to provide protection to enterprise for their drug trafficking operation in Liberia which included the transportation and delivery of illegal narcotics from one location to another with the bailiwick of the Republic of Liberia. She agreed to the implementation of the plan to transport narcotics and participated directly and indirectly by providing the high-

level political and security assurance and cover needed by the cartel in the execution of the plan to transport drugs.

21. **Sekou**, identity to be ascertained, participated in the May 30, 2026, movement of cocaine from Royesville, having emerged from the Royesville area with Srdan Seles, Johann Garces, and Christopher Saryee during the convoy operation.

22. **Mark Quiah**. Mark Kuiah former Deputy Director for Operations of the Liberia Civil Aviation Authority (LCAA), was recruited by Cayce Nelson. Mark Kuiah accepted to join the cartel trafficking enterprise and proposed US\$250,000.00 (Two Hundred Fifty Thousand United States Dollars) as compensation for his services. The proposed fee was accepted and the cartel paid him partial payment of US\$50,000.00 (Fifty Thousand United States Dollars). Mark Kuiah recruited F. Augustine Claudius Tamba, Deputy Director General of LCAA, and Abner Wanah Yonly, Sr., Manager, James Spriggs Payne Airfield and Jammel V. Jallah gave them (1) cellphone each; while Mark Kuiah and Caycee Nelson received two (2) for Communication. Mark Kuiah knew and had reasons to know that the cartel trafficking trade was to import cocaine into Liberia for storage, transportation and exportation out of Liberia to Europe and other destinations and accepted to provide the required assistance for the agreed fee of US\$250,000.00.

That Chapter 14, Subchapter E, Section 14.85 of the Controlled Drugs and Substances Act (2023) captioned - Unlicensed Sale, Administration, Dispensation, Delivery, Distribution, Dispatch in Transit and Transportation of Controlled Drugs or Substances provides that:

1. *Offense*: A person commits an offense if he/she sells or offers for sale, or trade, or administers, or dispenses, or delivers or gives away to another, or distributes or dispatches in transit, or transports any controlled drug and substance listed in scheduls I, II, and IV or acts as a broker in any such transactions without a licnes from the Minister. And no consignment of such drugs or controlled substance while in transit or being stored in a bonded warehouse shall be subject to any process which would change the nature of the drug in question.
2. *Grading*. The offense of unlicensed sale, trading, administration, dispensation, delivery, dispatch in transit and transportation of controlled drugs or substance shall be graded as follows:
 - a. Where the subject matter of the offense is a drug or substance listed in schedule I, or precursor or essential chemical listed in Table I and Table II to be used for the purpose of trafficking, the person shall be guilty of a felony of the first degree and, if the person shall be guilty of a felony of the first degree and, if used otherwise, shall be guilty of a second degree felony and shall serve a sentence between 10 to 20 years as presecrbed in Section 50.5 bS 50.6 of the Penal Law of Liberia. Where the offense is deemed a second degree felony, for the purpose of bail, only cash to the value of twice the bond; or cash deposit in the bank to the value of twice the bond as evidence by a bank certificate.
 - b. Where the subject matter of the offense is a drug or substances listed in schedule II, III and IV to be used for the purpose of trafficking, the person shall be guilty of a second degree felony and if used otherwise, shall be guilty of a first degree misdeanor. Punishment shall range between three to five years or more depending on the circumstances or as prescribed in Section 50.5 and 50.6 of the Penal Law of Liberia. As to the matter of bail,

only cash to the value of the bond; or cash deposit in the bank to the value of the bond as evidenced by a bank certificate”.

THAT THE PLAINTIFF SAYS THAT THE DEFENDANTS HAVE NO AFFIRMATIVE DEFENSE IN THE PREMISES.

COUNT IV:

UNLICENSED POSSESSION OF CONTROLLED DRUGS OR SUBSTANCES (§14.89, Controlled Drugs and Substances Act of 2023)

1. The General allegations section of this indictment is re-alleged and incorporated by reference as if fully set out herein.
2. The Special Grand Jurors re-allege Count I through Count III of the Indictment as contained hereinabove.
3. That the Special Grand Jurors of Montserrado County, Republic of Liberia, upon their oath, do hereby find more probably than not that the Defendants, *Tara Zadereiko, alias Tony; Mihovil Vrovac, alias Michael; Srdan Seles, Johann David Garc(E)S Grajales, Edison M. Brown, Mohammed Alpha Bah, Jammel V. Jallah, Christian L. Nyantee, Christopher Saryee, Anthony T. Blaye, Wadell W. Kwarbo, and Albenigo Junior*, acting individually and in concert with one another and with other persons known and unknown to the Grand Jury, purposely and/or knowingly participated in the **unlicensed possession of controlled drugs or substances, namely cocaine, contrary to §14.89 of the Controlled Drugs and Substances Act of 2023**.
4. On or about May 2021 through July 2026, Defendants *Taras Zadereiko, Mihovil Vrovac, Srdan Seles, Johann David Garc(E)S Grajales, Edison M. Brown, Mohammed Alpha Bah, Jammel V. Jallah, Christian L. Nyantee, Christopher Saryee, and Albenigo Janior*, together with others, knowingly possessed, exercised control over, or aided in the possession and control of cocaine without lawful authority. The cocaine was stored, transported and maintained at locations controlled or utilized by members of the conspiracy, including the Harris Ward and Cement Road locations.
5. That the cocaine was allegedly transported from an offshore vessel in the Atlantic Ocean, transferred to canoes, brought through the Po River to the shoreline at Royesville, Montserrado County, and landed at property acquired and maintained under the purported fishing-business name of Liberty Fishery, where the cocaine was stored and remained in the possession of the Defendants pending further movement. That the Royesville property was allegedly acquired and used as a receiving, delivery, dispatch in transit and storage location for cocaine imported into Liberia, and that the Defendants employed the fishing-business representation, fencing, security arrangements, transportation vehicles, and other logistical measures to conceal the true nature and purpose of the operation.
6. That the cocaine imported through the aforesaid operation was subsequently dispatched in transit and transported under the control of the Defendants from Royesville toward Cement Road, VOA Community, Paynesville, Robertsfield Highway, Montserrado County, Republic of Liberia, during the period of May 30 and May 31, 2026. That the cocaine remained under the control of the Defendants until July 21, 2026, at Cement Road, VOA Community, when law enforcement officers recovered 3,971 plates of suspected cocaine contained in 157 bags, having an estimated value of US\$317,000,000.00, and arrested Defendants Srdan Seles and Johann David Garces Grajales in connection with the consignment. The Defendants' possession and control were actual, constructive, joint and/or through persons acting at their direction,

depending upon the individual conduct more fully described in Counts I and II of this Indictment.

7. **Nikolas Ivancic** exercised, through persons acting under his direction or authority, constructive dominion and control over cocaine brought into Liberia and stored at the Royesville premises, *with knowledge of its identity and illicit character*.

8. **Taras Zadereiko**, alias Tony, knowingly exercised joint or constructive control over cocaine stored at the Royesville premises and transported from there, through his participation in securing the property, coordinating its use, and directing the movement of the cocaine.

9. **Mihovil Vrhovac** knowingly exercised constructive control over cocaine handled and transported through the operational network, by participating in its landing-site planning, operational coordination, and the arrangements for its movement and storage.

10. **Srdan Seles** had actual possession and control of cocaine while physically unloading and handling it at Royesville and while driving the Grey Nissan Van conveying the cocaine. On July 21, 2026, Srdan Seles was arrested together with Johann David Garces Grajales in actual possession or control of 3,971 plates of cocaine contained in 157 bags at Cement Road, VOA Community.

11. **Johann David Garces Grajales** knowingly exercised actual or joint control over the cocaine recovered at Cement Road, VOA Community, on July 21, 2026, consisting of 3,971 plates in 157 bags.

12. **Edison M. Brown** knowingly exercised constructive control over cocaine stored at the Royesville premises and over cocaine handled through the commercial and transportation arrangements he helped establish.

13. **Mohammed Alpha Bah** knowingly exercised joint or constructive control over cocaine during the May 31, 2026, transportation operation by joining and participating in the movement of the consignment.

14. **Jammel V. Jallah** knowingly exercised constructive control over cocaine stored at the Royesville premises and transported from there by persons acting under his direction or coordination.

15. **Christian L. Nyantee** knowingly exercised joint or constructive control over cocaine during the transportation operation by coordinating its movement, arranging the escort, including the security escort and participating in the convoy.

16. **Christopher Saryee** knowingly exercised joint or constructive control over cocaine stored at Royesville and transported in the May 30–31, 2026 movements, including through his participation in the storage and destination arrangements.

17. **Cayee Nelson** knowingly exercised constructive control over cocaine through his participation in the operational arrangements for its movement, storage, and intended exportation.

18. **Anthony T. Blaye** knowingly exercised joint or constructive control over cocaine during the transportation operation by participating in and protecting its movement, while being aware of the nature of the cargo.^{18.}) **Wadell W. Kwarbo** knowingly exercised joint or constructive control over cocaine during the transportation operation by

protecting and facilitating its movement through the use of his official vehicle and security authority.

19. **Albenigo Junior** agreed to participate in the security and transportation operation involving cocaine from Royesville toward Thinkers Village. On May 30, 2026, he met Christian L. Nyantee, Anthony T. Blaye, and Wadell W. Kwarbo, joined the convoy, and participated in the security arrangements for the cocaine movement.

20. **Gerald F. Smith** knowingly exercised constructive control over cocaine through his alleged participation in the security arrangements for its handling, storage, and transportation.

21. **Sheik Bashiru Kante** knowingly exercised constructive control over cocaine through his alleged participation in the commercial and logistical arrangements for its storage, transportation, and onward dispatch.

That Chapter 14, Subchapter E, Section 14.89 of the Controlled Drugs and Substances Act (2023) captioned – Unlicensed Possession of Controlled Drugs or Substances provides that:

1. **"Offense** - A person commits an offense if he/she possesses controlled drugs or substances in Schedule I, II, III, IV, or precursors or essential chemicals listed in Table I and Table II without a license issued by the Minister.
2. **Grading.** The offense of possession of controlled drugs and substances shall be graded as follows:
 - a) Where the subject matter of the offense is a drug or substances listed in schedule I, or precursor or essential chemical listed in Table I and Table II to be used for the purpose of trafficking, the person shall be guilty of a felony of the first degree and, if used otherwise, shall be guilty of a second-degree felony and shall serve a sentence between 10 to 20 years as prescribed in section 50.5 and 50.6 of the penal Law of Liberia. Where the offense is deemed a first-degree felony, it shall be a grave offense and shall not be billable. Where the offense is deemed second degree felony, for the purpose of bail, only cash to the value of twice the bond; or cash deposit in the bank to the value of twice the bond as evidenced by a bank certificate.
 - b) Where the subject matter of the offense is a drug or substances listed in schedule II, III and IV to be used for the purpose of trafficking, the person shall be guilty of a second-degree felony and if used otherwise, shall be guilty of a first-degree misdemeanor. Punishment shall range between three (3) to five (5) years or more depending on the circumstances or as prescribed in section 50.5 and 50.6 of the penal Law of Liberia. As to the matter of bail, only cash to the value of the bond; or cash deposit in the bank to the value of the bond as evidenced by a bank certificate".

THAT THE PLAINTIFF SAYS THAT THE DEFENDANTS HAVE NO AFFIRMATIVE DEFENSE IN THE PREMISES.

COUNT V:

**ILLICIT TRAFFICKING OF CONTROLLED DRUGS OR
SUBSTANCES (§14.93, Controlled Drugs and Substances Act of 2023)**

1. The General allegations section of this indictment is re-alleged and incorporated by reference as if fully set out herein.

2. The Special Grand Jurors re-allege Counts I through IV of the Indictment contained hereinabove.

3. **THE SPECIAL GRAND JURY FOR MONTSERRADO COUNTY, REPUBLIC OF LIBERIA, UPON OATH, DO HEREBY FIND, MORE PROBABLY THAN NOT, THAT:** the Defendants, *Tara Zadereiko, alias Tony; Mihovil Vrovac, alias Michael; Srdan Seles, Johann David Garc(E)S Grajales, Edison M. Brown, Mohammed Alpha Bah, Jammal V. Jallah, Christian L. Nyantee, Christopher Saryee, Anthony T. Blaye, Wadell W. Kwarbo, Albenigo Junior, and Madam Jewel Howard-Taylor*, acting individually and in concert with one another and with other persons known and unknown to the Grand Jury, purposely and/or knowingly **traffic controlled drugs or substances, namely cocaine, contrary to §14.93 of the Controlled Drugs and Substances Act of 2023 without a license from the Minister of Health.**

4. The trafficking included obtaining, financing, receiving, importing, transporting, possessing, concealing, moving, storing, protecting and arranging the onward movement, dispatch in transit and transportation of cocaine from a destination outside Liberia to a maritime receiving point in Royesville and Harris Ward to Cement Road, VOA Community, Paynesville, Roberts International Airport Highway, Montserrado County, Republic of Liberia.

5. The Defendants' conduct included the use of maritime routes, canoes, motor vehicles, stash houses, aviation arrangements, security escorts, financial transactions and communications. The cocaine seized on July 21, 2026 was part of the same trafficking operation.

6. **Nikolas Ivancic** knowingly and purposely organized, authorized, and supported the broader cocaine trafficking enterprise, including the importation, storage, transportation, and intended onward distribution or exportation of cocaine through Liberia.

7. **Taras Zadereiko** knowingly participated in the acquisition and operation of the Royesville storage facility, the handling and transportation of cocaine, the coordination of security arrangements, and the intended onward movement of the cocaine outside Liberia.

8. **Mihvolic Vrhovac** knowingly and purposely participated in the broader trafficking operation by planning air and maritime routes, conducting landing-site reconnaissance, transmitting landing-site coordinates, and participating in the Royesville cocaine operation.

9. **Srdan Seles** knowingly and purposely participated in the illicit trafficking operation by unloading, handling, transporting, and moving the cocaine from Royesville to Cement Road, VOA Community, and by maintaining possession or control over the cocaine recovered on July 21, 2026.

10. **Johann David Garc(E)S Grajales** knowingly participated in the cocaine trafficking operation through his involvement in the transportation and operational handling of the cocaine and his alleged participation in the consignment recovered on July 21, 2026.

11. **Edison M. Brown** knowingly and purposely participated in the trafficking enterprise by organizing or facilitating logistics, commercial shipment arrangements, aviation support, and the acquisition and use of the Royesville premises for cocaine storage and transportation.

12. **Mohammed Alpha Bah** knowingly participated in the broader cocaine trafficking operation by assisting in aviation and logistics arrangements, participating in the acquisition and securing of the Royesville premises, and joining the transportation of cocaine on May 31, 2026.
13. **Jammel V. Jallah** knowingly and purposely participated in the trafficking enterprise by recruiting operational personnel, arranging security and transportation, providing funds for the escort operation, participating in the acquisition and use of the Royesville storage premises, and coordinating the movement of cocaine.
14. **Christian L. Nyantee** knowingly and purposely participated in the trafficking operation by assisting with the Royesville storage facility, recruiting security personnel, coordinating transportation, receiving and distributing payments, and participating in the May 30–31 movements of cocaine.
15. **Christopher Saryee** knowingly and purposely participated in the trafficking enterprise by assisting in the acquisition of the Royesville premises, arranging the destination residence, and participating in the transportation of cocaine from Royesville toward Cement Road, VOA Community.
16. **Caycee Nelson** knowingly and purposely participated in the trafficking enterprise by assisting in aviation arrangements, recruiting airport personnel, and facilitating the operational infrastructure intended to move cocaine through Liberia.
17. **Anthony T. Blaye** knowingly and purposely participated in the illicit trafficking operation by using his official police vehicle and authority to protect and facilitate the movement of cocaine from Royesville toward its designated destination.
18. **Wadell W. Kwarbo** knowingly and purposely participated in the illicit trafficking operation by providing police escort and protection for vehicles transporting cocaine and receiving US\$5,000 as compensation for the operation.
19. **Albenigo Janior** knowingly and purposely participated in the trafficking operation by joining the transportation and security arrangements for cocaine moving from Royesville toward Cement Road, VOA Community.
20. **Gerald F. Smith** knowingly and purposely participated in the trafficking operation by providing security protection for the handling, transportation, and intended exportation of cocaine. Gerald F. Smith assigned three NSA Agents (Franklin Jallabah, Ekki Walters and Prince Jaryenneh) to provide security escorts for the transportation of cocaine and members of the cocaine-trafficking from Jummeba Village, Bomi County, to a compound rented by Gerald F. Smith in Parker Corner, Brewerville City, Montserrado County, Liberia. These agents knew that they were aiding and abetting the transportation, shipment and exportation of unlicensed drugs or substances out of Liberia received compensation from Gerald F. Smith ranging from approximately US\$2,000.00 to US\$5,000.00 depending on the operation.
21. **Sheik Bashiru Kante** knowingly and purposely participated in the trafficking enterprise by facilitating the connection between foreign principals and Liberian logistics participants and assisting in the arrangements for the movement and intended exportation of cocaine. Sheik Bashiru Kante made multiple shipments of containers loaded with cocaine mixed with cocoa from Liberia to Europe through Edison M. Brown brokerage company called Brown's Trucking Handling Services Enterprise.

22. **Madam Jewel Howard Taylor (Former Vice President of the Republic of Liberia)**-participated in the conspiracy from at least as early as 2021. In October 2021, Sheik Bashiru Kante introduced **MICHAEL** and **TONY** to Madan Jewel Howard-Taylor, at her Sophie Community Residence, Congo Town, Tubman Boulevard, Montserrado County, Liberia. In that meeting, Michael and Tony confirmed to Madam Taylor, in the presence of Sheik Bashiru Kante, that they were interested in doing business in Liberia and would like her to meet their boss in Dubai, United Arab Emirates (UAE). **Michael** averred that they wanted security protection from her to carry out their business in Liberia, and she agreed to provide them the required security protection. In November 2021, Madam Taylor headed a 5-man delegation including Sheik Bashiru Kante, Nowu Howard, Bernice Taylor, to Dubai, UAE which was facilitated by **MICHAEL** and **TONY**. During the November 2021 visit, **Nicolas, TONY and MICHAEL**, organized a meeting which was attended by Co-Defendants **Nicolas, Madam Jewel Howard-Taylor, Sheikh Bashiru Kante, Michael, Tony** and a person known as **Dejan** (a Russian National) at the H-Hotel, Trade Centre Roundabout, Sheikh Zayed Road, Dubai, United Arab Emirates (UAE), for the purpose of promoting, facilitating and organizing the illicit trafficking of drug through the Republic of Liberia. Nikolas recruited Co-Defendant Madam Jewel Howard Taylor at that meeting, to provide protection at a high governmental level for the illicit trafficking of cocaine through Liberia and promised that cocaine will be trafficked through Liberia but will not be sold, distributed, and used on the Liberian market, and that it will not be shipped to the United States of America (USA) or allies of the USA. **Nikolas** provided financial support to **Madam Jewel Howard-Taylor** and her Starfish Foundation, in the tune of approximately US\$75,000.00 in consideration for her *protection of their drug trafficking enterprise.*

23. That Madam Jewel Howard Taylor knowingly participated in the alleged narcotics enterprise, by providing or agreeing to aid, support, or other means that facilitated the operation's trafficking activities. She conspired and agreed with **Nikolas Ivancic, Sheik Bashiru Kante, Michael, Tony** and others to use her position as Vice President of the Republic of Liberia to provide protection to the enterprise for their drug trafficking operation in Liberia which included the Illicit trafficking of drugs from locations outside of Liberia and using Liberia as the transit point to traffic narcotics to other markets. She agreed to the implementation of the plan to traffic narcotics and participated directly and indirectly by providing the high-level political and security assurance and cover needed by the cartel in the execution of the plan to traffic drugs.

24. That all times material to this Indictment, the Defendant, Madam Jewel Howard Taylor maintained contact with the cocaine-trafficking network, through Sheik Bashiru Kante concerning their arrangements with **Nikola Ivancic, the Kingpin of the cocaine-trafficking network**, and other persons associated with the alleged international cocaine-trafficking network. That on or about August 31, 2026, the Defendant transmitted WhatsApp audio messages to Sheik Bashiru Kante requesting that he communicate with **Nikola Ivancic** and other persons on her behalf to obtain financial assistance, and in one such communication identified as **"1_WhatsApp_Audio_2026-08-31_at_12.39.02,"** the Defendant stated, among other things:

"You know things are really crazy on our end to see if they can send me some more help. I really appreciate it."

25. Co-Defendant Jewel Howard Taylor further requested that Kante ask Nicholas Ivancic to send her assistance, stating:

"So please ask Nicholas if he could send me some help."

26. That during the subsequent conversation between the Co-Defendant Howard Taylor and Sheik Bashiru Kante, Madam Jewel Howard Taylor with knowledge and belief that the money she received had been sent to her from Nikolas, the Kingpin of the cartel, acknowledged receipt of financial assistance in the amount of Fifteen Thousand United States Dollars (US\$15,000.00), stating:

"Thank you. Thank you. I've been turning around. I don't know where I would even get money for the other little boy's school fees."

27. That in another WhatsApp audio communication, identified as **"2_WhatsApp_Image_2026-08-31_at_12:39.21,"** the Defendant stated that she had been sending a message through Sheik Bashiru Kante and requested financial assistance for school expenses, stating:

"About 60,000.00 US will help me get everybody in school."

28. That on or about the same date, the Defendant transmitted another audio message, identified as **"3_WhatsApp_Audio_2026-08-31_at_12.39.57,"** thanking Kante for meeting with Nikola Ivancic and others and stating:

"I'm waiting for my boss to come back. He's in Ghana, and then he goes to Nigeria to speak at a bar conference. So, once he comes back, we sit."

29. That the said conversation further reflected that Kante discussed the amount of US\$15,000.00 and the Defendant acknowledged that amount and expressed appreciation for the financial assistance from the cartel. That in the same conversation, Kante conveyed information attributed to Nikola Ivancic concerning substantial losses allegedly suffered in Liberia, including a reference to "the 19 kilos" and an amount described in the conversation as "19 million or whatever that was." That Sheik Bashiru Kante further conveyed that Nikola was expecting goods from Sierra Leone to be moved to Liberia through his network, and during this conversation, the Defendant discussed the alleged losses and the movement of goods, including her statement:

"So maybe [they are] being hidden somewhere until a better time."

30. That these communications, considered together with the Defendant's prior alleged meetings with Nikola Ivancic, Mihovil Vrovac, Sheik Bashiru Kante, and other persons identified in this Indictment, are relevant to establishing the Defendant's knowledge of, relationship with, and alleged participation in the cocaine-trafficking network. That during the recorded conversation, the Defendant discussed financial assistance for political activities, including party conventions, campaign organization, transportation, campaign materials, and related expenditures. That the Defendant requested that Sheik Bashiru Kante communicate her financial needs to Nikola Ivancic and other persons and stated that she intended to discuss the arrangements with her political superior upon his return. The Defendant further discussed the provision of vehicles, campaign materials, cash, and other financial support, including the need to organize political activities across Liberia's fifteen counties. That during the conversation, the Defendant stated:

"We just need to do this thing the quiet way...that will make it easier to do."

31. That the Defendant also discussed the proposed use of financial resources in legitimate business arrangements, stating:

"Once you start from somewhere, you put it into legitimate business that you take it from one day."

32. That the foregoing statements, when considered with the other evidence concerning the alleged cocaine-trafficking network, are relevant to determining whether the Madam Taylor knowingly participated in arrangements involving the provision, receipt, concealment, or use of funds derived from unlawful activities. That the Defendant discussed the interests and expected returns of Sheik Bashiru Kante and other persons involved in the proposed financial arrangements, including a discussion concerning percentages and the assurance that the Defendant's share would be added to Sheik Bashiru Kante's share. That the Defendant stated:

"My percentage is set in stone. I'm not playing that game again."

33. That the Defendant further stated:

"I am adding mine to yours so how will you not get yours."

34. That the Republic relies upon these statements, together with the other evidence to be presented, as relevant to the alleged financial relationship and common arrangement among the persons identified in this Indictment. Furthermore, the 36. Defendant acknowledge, and believed that she had received financial assistance in the amount of US\$15,000.00 from the cartel through Sheik Bashiru Kante, which the Defendant acknowledged during the recorded conversation which confirmed her continued support, conspiracy and agreement with the cartel; the Defendant solicited additional financial assistance from Nikola Ivancic and persons associated with him, including a request for approximately US\$60,000.00 for educational expenses and subsequent requests for financial and political support. The Defendant knew or had reason to believe or suspect that such funds represented proceeds of crime and yet she accepted same. The Defendant's receipt, possession, use, transfer, or other handling of such funds is relied upon as conduct relevant to the offense of Money Laundering under *Section 15.2 of the Anti-Money Laundering, Terrorist Financing, Preventive Measures and Proceeds of Crimes Act, 2021*. Moreover, the Defendant's requests for financial assistance, her acknowledgment of receipt of funds, and her discussions concerning the anticipated provision and allocation of additional funds constitute acts relevant to the alleged agreement and common design charged in this Indictment, when considered.

35. **Mark Kuiah.** Mark Kuiah former Deputy Director for Operations of the Liberia Civil Aviation Authority (LCAA), was recruited by Cayce Nelson. Mark Kuiah accepted to join the cartel trafficking enterprise and proposed US\$250,000.00 (Two Hundred Fifty Thousand United States Dollars) as compensation for his services. The proposed fee was accepted and the cartel paid him partial payment of US\$50,000.00 (Fifty Thousand United States Dollars). Mark Kuiah recruited F. Augustine Claudius Tamba, Deputy Director General of LCAA, and Abner Wanah Yonly, Sr., Manager, James Spriggs Payne Airfield and Jammel V. Jallah gave them (1) cellphone each; while Mark Kuiah and Caycee Nelson received two (2) for Communication. Mark Kuiah knew and had reasons to know that the cartel trafficking trade was to import cocaine into Liberia for storage, transportation and exportation out of Liberia to Europe and other destinations and accepted to provide the required assistance for the agreed fee of US\$250,000.00.

36. **Sekou** and **Nana** to be identified knowingly and purposely participated in the illicit trafficking operation by assisting in the movement of cocaine from Royesville toward its designated destination.

37. That Chapter 14, Subchapter E, Section 14.93 of the Controlled Drugs and Substances Act (2023) captioned - Illicit Trafficking provides that:

1. **Offense.** A person commits an offense if he/she purposely or knowingly traffics controlled drugs or substances as per Schedule I, II, III, and IV or precursors or essential chemicals listed in Table I and Table II without a license from the Minister.
2. **Grading.** The offense of illicit trafficking in controlled drugs and substance shall be graded as follows:
 - a. Where the subject matter of the offense is a drug or substances listed in Schedule I, or precursor or essential chemical listed in Table I and Table II, the person shall be guilty of a felony of the first degree and upon conviction, shall serve a sentence between 10 to 20 years or as prescribed in Section 50.5 and 50.6 of the Penal Law of Liberia. Where the offense is deemed a first-degree felony, it shall be grave offense and shall not be billable.
 - b. Where the offense is deemed a second-degree felony, for the purpose of bail, only cash to the value of twice the bond; or cash deposit in the bank to the value of twice the bond as evidenced by a bank certificate”.

THAT THE PLAINTIFF SAYS THAT THE DEFENDANTS HAVE NO AFFIRMATIVE DEFENSE IN THE PREMISES.

COUNT VI:

**UNLICENSED EXPORTATION OF CONTROLLED DRUGS OR SUBSTANCES
(§14.84 Controlled Drugs or Substances Act, 2023)**

1. The General allegations section of this indictment is re-alleged and incorporated by reference as if fully set out herein.
2. The Special Grand Jurors re-allege Counts I through V of the Indictment contained hereinabove.
3. **THE SPECIAL GRAND JURY FOR MONTSERRADO COUNTY, REPUBLIC OF LIBERIA, UPON OATH, DO HEREBY FIND, MORE PROBABLY THAN NOT, THAT:** The Defendants, *Nikola Ivancic, Tara Zadereiko, alias Tony; Mihovil Vrovac, alias Michael; Srdan Seles, Johann David Garc(E)S Grajales, Edison M. Brown, Mohammed Alpha Bah, Jammal V. Jallah, Christian L. Nyantee, Christopher Saryee, Madam Jewel Howard-Taylor Sheik Bashiru Kante, and Albenigo Janior*, acting individually and in concert with one another and with other persons known and unknown to the Grand Jury, **purposely and/or knowingly export out of Liberia controlled drugs or substances, namely cocaine, contrary to §14.84 of the Controlled Drugs and Substances Act of 2023.**
4. That during the period preceding and including May 2026, the Defendants and their associates allegedly organized, facilitated, financed, received, concealed, and transported substantial quantities of cocaine brought into Liberia from outside its territorial boundaries by an unidentified vessel, without a license issued by the Minister of Health.
5. That the imported cocaine was allegedly transferred from the vessel by canoe through the coastal waters and the Po River, conveyed to a temporary storage location in Harris Ward Community, Royesville Township, Montserrado County, Republic of Liberia, and thereafter transported toward a compound situated along Cement Road, VOA Community, Thinker Village, Paynesville, Robertsfield Highway, Montserrado County.

6. That the cocaine subsequently recovered from the VOA Community compound on July 21, 2026, comprised approximately three thousand nine hundred seventy-one (3,971) plates, with an estimated street value of Three Hundred Seventeen Million United States Dollars (US\$317,000,000.00). That the Defendants' respective conduct, as particularized below, formed part of the arrangements by which the cocaine was introduced into Liberia, received, protected, concealed, and moved within the Republic for the purpose of onward transportation and exportation to Europe and other destinations.

7. That the Royesville property was allegedly acquired and used as a receiving and storage location for cocaine imported into Liberia, and that the Defendants employed the fishing-business representation, fencing, security arrangements, transportation vehicles, and other logistical measures to conceal the true nature and purpose of the operation.

8. **Nikolas Ivancic** supported the planned onward exportation of cocaine from Liberia to Europe or other destinations through the use of commercial cargo and aviation arrangements. **Nikolas Ivancic** financed and caused mutiple shipments of containers loaded with cocaine mixed with cocoa from Liberia to Europe and other destinations through **Edison M. Brown** brokerage company called **Edna Cargo Services**. The first shipment of three containers arrived at the freeport of Monrovia, with **Hinterland Resources** being the shipper on October 6, 2021. A Release Order from **APM Terminals**, under release order number **RO700LO2039** was issued to **Hinterland Resources**, to move forward with the export of the three containers containing cocoa beans on October 12, 2021. *This shipment occurred under Bill of Lading number **MEDUM9041853**.* The following containers were on the vessel **MSC Katalin II WU146R: MEDU3538986/20'DV, MEDU3879004/20'DV and TGCU2116792/20'DV**.

9. **Taras Zadereiko**, also known as **Tony** or **William Tony**, participated in arrangements for the onward exportation of cocaine through commercial cargo and other channels. His May 2026 participation in the transportation of cocaine toward Cement Road supports the alleged preparation for export. **Taras Zadereiko** arranged and facilitated mutiple shipments of containers loaded with cocaine mixed with cocoa from Liberia to Europe and other destinations through **Edison M. Brown** brokerage company called **Edna Cargo Services**. The first shipment of three containers arrived at the freeport of Monrovia, with **Hinterland Resources** being the shipper on October 6, 2021. A Release Order from **APM Terminals**, under release order number **RO700LO2039** was issued to **Hinterland Resources**, to move forward with the export of the three containers containing cocoa beans on October 12, 2021. *This shipment occurred under Bill of Lading number **MEDUM9041853**.* The following containers were on the vessel **MSC Katalin II WU146R: MEDU3538986/20'DV, MEDU3879004/20'DV and TGCU2116792/20'DV**.

10. **Mihovil Vrhovac**, also identified as "Michael" planned air and maritime routes for the onward movement of cocaine from Liberia to Europe and other destinations. He arranged, masterminded and facilitated mutiple shipments of containers loaded with cocaine mixed with cocoa from Liberia to Europe and other destinations through **Edison M. Brown** brokerage company called **Edna Cargo Services**. The first shipment of three containers arrived at the freeport of Monrovia, with **Hinterland Resources** being the shipper on October 6, 2021. A Release Order from **APM Terminals**, under release order number **RO700LO2039** was issued to **Hinterland Resources**, to move forward with the export of the three containers containing cocoa beans on October 12, 2021. *This shipment occurred under Bill of Lading number **MEDUM9041853**.* The following containers were on the vessel **MSC Katalin II WU146R: MEDU3538986/20'DV, MEDU3879004/20'DV and TGCU2116792/20'DV**.

11. **Edison M. Brown, Mohammed Alhpa Bah** organized and used their companies to facilitate commercial brokerage and container-shipping arrangements through which cocaine was exported from Liberia concealed among legitimate commodities to Europe. He used his brokerage companies, arranged, facilitated and personally handled multiple shipments of containers loaded with cocaine mixed with cocoa from Liberia to Europe and other destinations through Edison M. Brown brokerage company called Edna Cargo Services. The first shipment of three containers arrived at the freeport of Monrovia, with Hinterland Resources being the shipper on October 6, 2021. A Release Order from APM Terminals, under release order number RO700LO2039 was issued to Hinterland Resources, to move forward with the export of the three containers containing cocoa beans on October 12, 2021. This shipment occurred under Bill of Lading number **MEDUM9041853**. The following containers were on the vessel **MSC Katalin II WU146R: MEDU3538986/20'DV, MEDU3879004/20'DV and TGCU2116792/20'DV**.

12. **Jammel V. Jallah** participation in the planning of onward cocaine movement through aviation and commercial logistics, including arrangements for transportation from Royesville toward Cement Road. He organized, financed, facilitated and arranged multiple shipments of containers loaded with cocaine mixed with cocoa from Liberia to Europe and other destinations through Edison M. Brown brokerage company called Edna Cargo Services. The first shipment of three containers arrived at the freeport of Monrovia, with Hinterland Resources being the shipper on October 6, 2021. A Release Order from APM Terminals, under release order number RO700LO2039 was issued to Hinterland Resources, to move forward with the export of the three containers containing cocoa beans on October 12, 2021. This shipment occurred under Bill of Lading number **MEDUM9041853**. The following containers were on the vessel **MSC Katalin II WU146R: MEDU3538986/20'DV, MEDU3879004/20'DV and TGCU2116792/20'DV**.

13. **Christian L. Nyantee** is connected to the movement of cocaine from the Freeport of Monrovia toward a location from which cocaine loaded on a truck at the Freeport of Monrovia and exported out of Liberia. He participated in the planning, organization and exportation of multiple shipments of containers loaded with cocaine mixed with cocoa from Liberia to Europe and other destinations through Edison M. Brown brokerage company called Edna Cargo Services. The first shipment of three containers arrived at the freeport of Monrovia, with Hinterland Resources being the shipper on October 6, 2021. A Release Order from APM Terminals, under release order number RO700LO2039 was issued to Hinterland Resources, to move forward with the export of the three containers containing cocoa beans on October 12, 2021. This shipment occurred under Bill of Lading number **MEDUM9041853**. The following containers were on the vessel **MSC Katalin II WU146R: MEDU3538986/20'DV, MEDU3879004/20'DV and TGCU2116792/20'DV**.

14. **Christopher Saryee**, also identified as Kwesi, and Caycee Nelson are connected with knowingly assisting in preparing cocaine from the Freeport of Monrovia for onward movement and export. They arranged and facilitated multiple shipments of containers loaded with cocaine mixed with cocoa from Liberia to Europe and other destinations through Edison M. Brown brokerage company called Edna Cargo Services. The first shipment of three containers arrived at the Freeport of Monrovia, with Hinterland Resources being the shipper on October 6, 2021. A Release Order from APM Terminals, under release order number **RO700LO2039** was issued to Hinterland Resources, to move forward with the export of the three containers containing cocoa beans on October 12, 2021. This shipment occurred under Bill of Lading number **MEDUM9041853**. The following containers were on the vessel **MSC Katalin II WU146R: MEDU3538986/20'DV, MEDU3879004/20'DV and TGCU2116792/20'DV**.

15. **Sheik Bashiru Kante** is connected to the use of commodity containers and commercial shipping channels to export cocaine concealed among legitimate goods. **Sheik Bashiru Kante, Edison M. Brown, Mohammed Alhpa Bah** organized and used their companies to facilitate commercial brokerage and container-shipping arrangements through which cocaine was exported from Liberia concealed among legitimate commodities to Europe. He used his brokerage companies, arranged, facilitated and personally handled mutiple shipments of containers loaded with cocaine mixed with cocoa from Liberia to Europe and other destinations through Edison M. Brown brokerage company called Edna Cargo Services. The first shipment of three containers arrived at the freeport of Monrovia, with Hinterland Resources being the shipper on October 6, 2021. A Release Order from APM Terminals, under release order number RO700LO2039 was issued to Hinterland Resources, to move forward with the export of the three containers containing cocoa beans on October 12, 2021. This shipment occurred under Bill of Lading number **MEDUM9041853**. The following containers were on the vessel **MSC Katalin II WU146R: MEDU3538986/20'DV, MEDU3879004/20'DV and TGCU2116792/20'DV**.

16. **Jewel Howard-Taylor** provided support and cover for the cartel operations in Liberia including but not limited to the exportation of cocaine from Liberia to Europe. She is connected to the use of commodity containers and commercial shipping channels to export cocaine concealed among legitimate goods. Relying on her support, influence, protection and cover, **Sheik Bashiru Kante, Edison M. Brown, and Mohammed Alhpa Bah** organized and used their companies to facilitate commercial brokerage and container-shipping arrangements through which cocaine was exported from Liberia concealed among legitimate commodities to Europe. He used his brokerage companies, arranged, facilitated and personally handled mutiple shipments of containers loaded with cocaine mixed with cocoa from Liberia to Europe and other destinations through Edison M. Brown brokerage company called Edna Cargo Services. The first shipment of three containers arrived at the freeport of Monrovia, with Hinterland Resources being the shipper on October 6, 2021. A Release Order from APM Terminals, under release order number RO700LO2039 was issued to Hinterland Resources, to move forward with the export of the three containers containing cocoa beans on October 12, 2021. This shipment occurred under Bill of Lading number **MEDUM9041853**. The following containers were on the vessel **MSC Katalin II WU146R: MEDU3538986/20'DV, MEDU3879004/20'DV and TGCU2116792/20'DV**.

17. Madam Jewel Howard Taylor knowingly participated in the alleged narcotics enterprise, by providing or agreeing to provide assistance, support, or other means that facilitate the drug cartel trafficking activities. She conspired and agreed with **Nikolas Ivancic, Sheik Bashiru Kante, Michael and Tony** to use her position as Vice President of the Republic of Liberia to provide protection to the enterprise for their drug trafficking operation in Liberia which included the exportation of drugs from Liberia, using Liberia as a transit point for the exportation of narcotics to other markets. She agreed to the implementation of the plan to traffic narcotics and participated directly and indirectly by providing the high-level political assurance and cover needed by the cartel in the execution of the plan to export narcotics.

18. **Mark Kuiah**. Mark Kuiah former Deputy Director for Operations of the Liberia Civil Aviation Authority (LCAA), was recruited by Cayce Nelson. Mark Kuiah accepted to join the cartel trafficking enterprise and proposed US\$250,000.00 (Two Hundred Fifty Thousand United States Dollars) as compensation for his services. The proposed fee was accepted and the cartel paid him partial payment of US\$50,000.00 (Fifty Thousand United States Dollars). Mark Kuiah recruited **F. Augustine Claudius Tamba**, Deputy Director General of LCAA, and **Abner Wanah Yonly, Sr.**, Manager, James Spriggs Payne Airfield and **Jammel V. Jallah** gave them (1) cellphone each; while Mark Kuiah and Caycee Nelson

received two (2) for Communication. Mark Kuiah knew and had reasons to know that the cartel trafficking trade was to import cocaine into Liberia for storage, transportation and exportation out of Liberia to Europe and other destinations and accepted to provide the required assistance for the agreed fee of US\$250,000.00.

THAT THE PLAINTIFF SAYS THAT THE DEFENDANTS HAVE NO AFFIRMATIVE DEFENSE IN THE PREMISES.

COUNT VII:

**UNLAWFUL MAINTENANCE OF PLACE FOR DRUGS OR SUBSTANCES
(§14.94 Controlled Drugs or Substances Act, 2023)**

1. The General allegations section of this indictment is re-alleged and incorporated by reference as if fully set out herein.
2. The Special Grand Jurors re-allege Counts I through IV of the Indictment contained hereinabove.
3. **THAT THE GRAND JURORS OF MONTSERRADO COUNTY, REPUBLIC OF LIBERIA, UPON THEIR OATH, DO HEREBY FIND MORE PROBABLY THAN NOT THAT:** *The Defendants, Nikola Ivancic, Tara Zadereiko, alias Tony; Mihovil Vrovac, alias Michael; Srdan Seles, Johann David Garc(E)S Grajales, Edison M. Brown, Mohammed Alpha Bah, Jammel V. Jallah, Christian L. Nyantee, Christopher Saryee, acting individually and in concert with one another and with other persons known and unknown to the Grand Jury, purposely and/or knowingly leased, opened or maintained a place/real property in Royesville, Montserrado County, Liberia, for the purpose of unlicensed storage, distribution, transportation and exportation of controlled drugs or substances, namely cocained out of the Republic of Liberia contrary to §14.94 of the Controlled Drugs and Substances Act of 2023.*
4. **Nikola Ivancic** maintenance and use of the Royesville premises through the enterprise's acquisition, financing, and operational control. He exercised control over, financed, or knowingly caused the premises to be maintained for drug-related purposes.
5. **Taras Zadereiko**, also known as Tony or William Ton, participated in acquiring and preparing the Royesville premises, purchasing renovation equipment, and using the property as a cocaine storage facility under the cover of Liberty Fishery.
6. **Mihovil Vrhovac**, also identified as Vrovac or Michael, participated in acquiring and securing the Royesville property as a drug storage facility.
7. **Srdan Seles** participated in the acquisition of the Royesville property and was involved in the operational use of the Royesville storage location. He exercised control over the premises, participated in its operation, or knowingly maintained or assisted in maintaining it for cocaine storage and lived in it until he was arrested along with Johann David Garces Grajales and the bags of cocaine.
8. **Johann David Garces Grajales** participated in the acquisition, control, maintenance, or knowing use of the Royesville premises as a cocaine storage facility. He resided in the premises until he was arrested along with Srdan Seles and the bags of cocaine.
9. **Edison M. Brown, Mohmmmed Alpha Bah, Jammel V. Jallah, Christian Nyantee, Caycee Nelson, and Christopher Saryee**, also identified as Chris-cee, travelled to Royesville to acquire and secure the Liberty Fishery premises for use as a cocaine-storage facility.

10. That Section §14.94- Unlawful Maintenance Of Place For Drugs or Substances (§14.94 Controlled Drugs or Substances Act, 2023).

1. "Offense. A person commits an offense if he/she knowingly opens or maintains a ny place for the purpose of unlicensed selling, administering, delivering, storing or distributing controlled drugs or substances or controlled precursors and essential chemicals.
2. Grading. The offense of unlawful maintenance of place for drug or substances shall be follows:
 - a. Where the subject matter of the offense is a drug or substance listed in schedule I, or precursor or essential chemical listed in Table I and Table 11 to be used for the purpose of trafficking, the person shall be guilty of a felony of the first degree and, if otherwise, shall be guilty of a second degree felony. Upon conviction, shall serve a sentence between 10 to 20 years or as prescribed in Section 50.5 and 50.6 of the Penal Law of Liberia. Where the offense is deemed a first degree felony, it shall be a grave offense and shall not be liable. Where the offense is deemed a second degree felony, for the purpose of bail, only cash to the value of twice the bond; or cash deposit in the bank to the value of twice the bond as evidenced by a bank certificate. All properties, real and/or personal, used in the commission of the offense shall escheat to the Republic.
 - a. Where the subject matter of the offense is a drug or substance listed in scheduled II, III and IV to be used for the purpose of trafficking, the person shall be guilty of a second degree felony and if otherwise, shall be guilty of a first degree misdemeanour in which case, shall serve a sentence between three to five years or more depending on the circumstances or as prescribed in Section 50.5 and 50.6 of the Penal Law of Liberia. As to the matter of bail, only cash to the value of the bond; or cash deposit in the bank to the value of the bond as evidenced by a bank certificate".

THAT THE PLAINTIFF SAYS THAT THE DEFENDANTS HAVE NO AFFIRMATIVE DEFENSE IN THE PREMISES.

COUNT VIII:
CRIMINAL FACILITATION
(§10.2, Penal Law of Liberia)

1. The General allegations section of this indictment is re-alleged and incorporated by reference as if fully set out herein.
2. The Special Grand Jurors re-allege Counts I through V hereinabove.
3. **THE SPECIAL GRAND JURY FOR MONTSERRADO COUNTY, REPUBLIC OF LIBERIA, UPON OATH, DO HEREBY FIND, MORE PROBABLY THAN NOT, THAT:** the Defendants, *Tara Zadereiko, alias Tony; Mihovil Vrovac, alias Michael; Srdan Seles, Johann David Garc(E)S Grajales, Edison M. Brown, Mohammed Alpha Bah, Jammell V. Jallah, Christian L. Nyantee, Christopher Saryee, Anthony T. Blaye, Wadell W. Kwarbo, Albenigo Junior, and Madam Jewel Howard-Taylor*, acting individually and in concert with one another and with other persons known and unknown to the Grand Jury, purposely and/or knowingly believing it probable that they were rendering aid to persons intending to commit felony drug offenses, engaged in conduct that provided means, opportunity, protection, financing, transportation, communication, security or other assistance that in fact aided the commission of the offenses, **namely the unlicensed**

possession, importation, trafficking, dispatch in transit and transportation of cocaine into Liberia, contrary to §10.2 of the Penal Code and relevant provisions of the Controlled Drug and Substances Act of 2023.

4. **Nikola Ivancic**, acting as a principal of the alleged transnational narcotics enterprise, authorized and supported the movement of cocaine into Liberia, its storage at Royesville, and its subsequent transportation for onward distribution or exportation. He was the authority and financial capacity behind the Liberian operational structure, and provided financial support, direction, approval, and operational resources to persons who acquired the landing and storage locations, arranged transport, and secured personnel for the movement of cocaine.

5. **Taras Zadereiko**, also known as Tony or William Tony, participated in securing the premises, procuring equipment used in renovation, coordinating transportation, and *directing security arrangements constitutes the principal factual basis for alleging that he knowingly provided means or opportunity for the trafficking operation.*

6. **Mihovil Vrhovac**, also identified as Vrovac or Michael, provided encrypted communication devices, preparation of landing-site coordinates, coordination with overseas principals, and participation in aviation and maritime logistics constitute the principal facilitation allegations.

7. **Srdan Seles** unloaded, handled, loaded, and drove one of the vehicles that transported the cocaine from Roynesville to Cement Road, VOA Community, Paynesville, Robertsfield Highway, Montserrado County, Liberia are the principal acts by which he allegedly aided the trafficking operation.

8. **Johann David Garces Grajales** unloaded, handled, loaded, and drove one of the vehicles that transported the cocaine from Roynesville to Cement Road, VOA Community, Paynesville, Robertsfield Highway, Montserrado County, Liberia are the principal acts by which he allegedly aided the trafficking operation.

9. **Edison M. Brown** was the logistics and brokerage operator, aviation facilitator, and participant in the acquisition and use of the storage property. He provided his brokerage services, arrangements for aircraft and aviation-related expenses, recruitment or coordination of operational personnel, and participation in securing premises and logistical resources.

10. **Mohammed Alpha Bah** was the business intermediary, logistics facilitator, and participant in the aviation and property arrangements. He introduced the commercial and logistical participants, involvement in aviation arrangements, and assistance in securing the storage premises and operational infrastructure.

11. **Jammel V. Jallah** introduced commercial and logistical participants, involvement in aviation arrangements, and assistance in securing the storage premises and operational infrastructure. He provided US\$10,000 to Christian L. Nyantee, who distributed US\$5,000 each to Anthony T. Blaye and Wadell W. Kwarbo.

12. **Chirstian L. Nyantee** recruited the security personnel, arranged the meeting on May 30, 2026, coordinated the convoy, received US\$10,000.00 envelope from Jammel V. Jallah, and distributed the alleged payments to Anthony T. Blaye and Wadell W. Kwarbo.

13. **Christopher Saryee**, also identified as **Chris-cee**, participated in securing the premises, participated in the movement of cocaine, and supporting transportation logistics forms the basis for this count.

14. **Caycee Nelson** recruitment of Mark Egon Kuiah, assistance with airport access, participation in aviation arrangements, and involvement in landing-site and storage planning.
15. **Anthony T. Blaye** used of official police authority and vehicle to protect and facilitate the movement of cocaine is the central basis for this charge.
16. **Wadell W. Kwarbo** use of his official vehicle, police authority, and security position to protect the transportation operation is the primary basis for facilitation.
17. **Albenigo Junior** participated in the escort arrangement and transportation operation constitutes the principal basis for this charge.
18. **Gerald F. Smith** provided security protection for the landing, storage, loading, and onward movement of cocaine forms the principal basis for facilitation.
19. **Sheik Bashiru Kante** introduction of foreign participants to Liberian logistics and brokerage operators, provision of commercial shipment channels, and assistance in arranging export-related infrastructure are the principal facilitation allegations.
20. **Madam Jewel Howard Taylor (Former Vice President of the Republic of Liberia)**-participated in the conspiracy from at least as early as 2021. In October 2021, Sheik Bashiru Kante introduced **MICHAEL** and **TONY** to Madan Jewel Howard-Taylor, at her Sophie Community Residence, Congo Town, Tubman Boulevard, Montserrado County, Liberia. In that meeting, Michael and Tony confirmed to Madam Taylor, in the presence of Sheik Bashiru Kante, that they were interested in doing business in Liberia and would like her to meet their boss in Dubai, United Arab Emirates (UAE). **Michael** averred that they wanted security protection from her to carry out their business in Liberia, and she agreed to provide them the required security protection. In November 2021, Madam Taylor headed a 5-man delegation including Sheik Bashiru Kante, Nowu Howard, Bernice Taylor, to Dubai, UAE which was facilitated by **MICHAEL** and **TONY**. During the November 2021 visit, **Nikolas, TONY and MICHAEL**, organized a meeting which was attended by Co-Defendants **Nikolas, Madam Jewel Howard-Taylor, Sheikh Bashiru Kante, Michael, Tony** and a person known as **Dejan** (a Russian National) at the H-Hotel, Trade Centre Roundabout, Sheikh Zayed Road, Dubai, United Arab Emirates (UAE), for the purpose of promoting, facilitating and organizing the illicit trafficking of drug through the Republic of Liberia. **Nikolas** recruited Co-Defendant Madam Jewel Howard Taylor at that meeting, to provide protection at a high governmental level for the illicit trafficking of cocaine through Liberia and promised that cocaine will be trafficked through Liberia but will not be sold, distributed, and used on the Liberian market, and that it will not be shipped to the United States of America (USA) or allies of the USA. **Nikolas** provided financial support to **Madam Jewel Howard-Taylor** and her Starfish Foundation, in the tune of approximately US\$75,000.00 in consideration for her protection of their drug trafficking enterprise.
21. Madam Jewel Howard Taylor knowingly participated in the alleged narcotics enterprise, by providing or agreeing to provide assistance, support, or other means to facilitate the drug cartel's illicit trafficking activities. She conspired and agreed with **Nikolas Ivancic, Sheik Bashiru Kante, Michael and Tony** to use her position as Vice President of the Republic of Liberia to provide protection to the enterprise for their drug trafficking operation in Liberia which included the exportation of drugs from Liberia, using Liberia as a transit point for the exportation of narcotics to other markets. She agreed to the implementation of the plan to traffic narcotics and participated directly and indirectly by providing the high-level political assurance and cover needed by the cartel in the execution of the plan to export narcotics.

22. That all times material to this Indictment, the Defendant, Madam Jewel Howard Taylor maintained contact with the cocaine-trafficking network, through Sheik Bashiru Kante concerning their arrangements with Nikola Ivancic, the Kingpin of the cocaine-trafficking network, and other persons associated with the alleged international cocaine-trafficking network. That on or about August 31, 2026, the Defendant transmitted WhatsApp audio messages to Sheik Bashiru Kante requesting that he communicate with Nikola Ivancic and other persons on her behalf to obtain financial assistance, and in one such communication identified as **"1_WhatsApp_Audio_2026-08-31_at_12.39.02,"** the Defendant stated, among other things:

"You know things are really crazy on our end to see if they can send me some more help. I really appreciate it."

23. Co-Defendant Jewel Howard Taylor further requested that Kante ask Nicholas Ivancic to send her assistance, stating:

"So please ask Nicholas if he could send me some help."

24. That during the subsequent conversation between the Co-Defendant Howard Taylor and Sheik Bashiru Kante, Madam Jewel Howard Taylor with knowledge and belief that the money she received had been sent to her from Nikolas, the Kingpin of the cartel, acknowledged receipt of financial assistance in the amount of Fifteen Thousand United States Dollars (US\$15,000.00), stating:

"Thank you. Thank you. I've been turning around. I don't know where I would even get money for the other little boy's school fees."

25. That in another WhatsApp audio communication, identified as **"2_WhatsApp_Image_2026-08-31_at_12:39.21,"** the Defendant stated that she had been sending a message through Sheik Bashiru Kante and requested financial assistance for school expenses, stating:

"About 60,000.00 US will help me get everybody in school."

26. That on or about the same date, the Defendant transmitted another audio message, identified as **"3_WhatsApp_Audio_2026-08-31_at_12.39.57,"** thanking Kante for meeting with Nikola Ivancic and others and stating:

"I'm waiting for my boss to come back. He's in Ghana, and then he goes to Nigeria to speak at a bar conference. So, once he comes back, we sit."

27. That the said conversation further reflected that Kante discussed the amount of US\$15,000.00 and the Defendant acknowledged that amount and expressed appreciation for the financial assistance from the cartel. That in the same conversation, Kante conveyed information attributed to Nikola Ivancic concerning substantial losses allegedly suffered in Liberia, including a reference to "the 19 kilos" and an amount described in the conversation as "19 million or whatever that was." That Sheik Bashiru Kante further conveyed that Nikola was expecting goods from Sierra Leone to be moved to Liberia through his network, and during this conversation, the Defendant discussed the alleged losses and the movement of goods, including her statement:

"So maybe [they are] being hidden somewhere until a better time."

28. That these communications, considered together with the Defendant's prior alleged meetings with Nikola Ivancic, Mihovil Vrovac, Sheik Bashiru Kante, and other

persons identified in this Indictment, are relevant to establishing the Defendant's knowledge of, relationship with, and alleged participation in the cocaine-trafficking network. That during the recorded conversation, the Defendant discussed financial assistance for political activities, including party conventions, campaign organization, transportation, campaign materials, and related expenditures. That the Defendant requested that Sheik Bashiru Kante communicate her financial needs to Nikola Ivancic and other persons and stated that she intended to discuss the arrangements with her political superior upon his return. The Defendant further discussed the provision of vehicles, campaign materials, cash, and other financial support, including the need to organize political activities across Liberia's fifteen counties. That during the conversation, the Defendant stated:

"We just need to do this thing the quiet way...that will make it easier to do."

29. That the Defendant also discussed the proposed use of financial resources in legitimate business arrangements, stating:

"Once you start from somewhere, you put it into legitimate business that you take it from one day."

30. That the foregoing statements, when considered with the other evidence concerning the alleged cocaine-trafficking network, are relevant to determining whether the Madam Taylor knowingly participated in arrangements involving the provision, receipt, concealment, or use of funds derived from unlawful activities. That the Defendant discussed the interests and expected returns of Sheik Bashiru Kante and other persons involved in the proposed financial arrangements, including a discussion concerning percentages and the assurance that the Defendant's share would be added to Sheik Bashiru Kante's share. That the Defendant stated:

"My percentage is set in stone. I'm not playing that game again."

31. That the Defendant further stated:

"I am adding mine to yours so how will you not get yours."

32. That the Republic relies upon these statements, together with the other evidence to be presented, as relevant to the alleged financial relationship and common arrangement among the persons identified in this Indictment. Furthermore, the 36. Defendant acknowledge, and believed that she had received financial assistance in the amount of US\$15,000.00 from the cartel through Sheik Bashiru Kante, which the Defendant acknowledged during the recorded conversation which confirmed her continued support, conspiracy and agreement with the cartel; the Defendant solicited additional financial assistance from Nikola Ivancic and persons associated with him, including a request for approximately US\$60,000.00 for educational expenses and subsequent requests for financial and political support. The Defendant knew or had reason to believe or suspect that such funds represented proceeds of crime and yet she accepted same. The Defendant's receipt, possession, use, transfer, or other handling of such funds is relied upon as conduct relevant to the offense of Money Laundering under Section 15.2 of the Anti-Money Laundering, Terrorist Financing, Preventive Measures and Proceeds of Crimes Act, 2021. Moreover, the Defendant's requests for financial assistance, her acknowledgment of receipt of funds, and her discussions concerning the anticipated provision and allocation of additional funds constitute acts relevant to the alleged agreement and common design charged in this Indictment, when considered.

33. **Mark Kuiah.** Mark Kuiah former Deputy Director for Operations of the Liberia Civil Aviation Authority (LCAA), was recruited by Cayce Nelson. Mark Kuiah accepted to join the cartel trafficking enterprise and proposed US\$250,000.00 (Two Hundred Fifty Thousand United States Dollars) as compensation for his services. The proposed fee was accepted and the cartel paid him partial payment of US\$50,000.00 (Fifty Thousand United States Dollars). Mark Kuiah recruited F. Augustine Claudius Tamba, Deputy Director General of LCAA, and Abner Wanah Yonly, Sr., Manager, James Spriggs Payne Airfield and Jammel V. Jallah gave them (1) cellphone each; while Mark Kuiah and Caycee Nelson received two (2) for Communication. Mark Kuiah knew and had reasons to know that the cartel trafficking trade was to import cocaine into Liberia for storage, transportation and exportation out of Liberia to Europe and other destinations and accepted to provide the required assistance for the agreed fee of US\$250,000.00.

34. The foregoing conduct, taken together with the other acts alleged herein, constitutes criminal facilitation as charged.

35. **That Chapter 10, Subchapter "D", Section 10.2 - Criminal Facilitation of the Penal Law- provides that:**

1. **"Offense:** A person is guilty of Criminal Facilitation who, believing it probable that he is rendering aid to a person who intends to commit a crime, engages in contact which provides such person with means or opportunity for the commission thereof and which in fact aids such person to commit a felony. This section does not apply to a person who is either expressly or by implication, made not accountable by the statute defining the felony facilitated or related statutes.
2. **Defense precluded.** It is no defense to a prosecution under the section that the person whose conduct the defendant facilitated has been acquitted, has not been prosecuted or convicted, has been convicted of a different offense, it immune from prosecution, or for some other reasons cannot be brought to justice.
3. **Grading.** Facilitation of a felony of the first degree is a felony of the third degree. Facilitation of of felony of the second degree or felony of the third degree is a misdemeanor of the First degree".

THAT THE PLAINTIFF SAYS THAT THE DEFENDANTS HAVE NO AFFIRMATIVE DEFENSE IN THE PREMISES.

**COUNT IX:
CRIMINAL SOLICITATION
(§10.3, Penal Law of Liberia)**

1. The General allegations section of this indictment is re-alleged and incorporated by reference as if fully set out herein
2. The Grand Jurors re-allege Counts 1 through 8 of the Indictment mentioned hereinabove.
3. **THAT THE GRAND JURORS OF MONTSERRADO COUNTY, REPUBLIC OF LIBERIA, UPON THEIR OATH, DO HEREBY FIND MORE PROBABLY THAN NOT THAT:** The Defendants, *Nikola Invancic, Tara Zadereiko, alias Tony; Mihovil Vrovac, alias Michael; Jammel V. Jallah, Christian L. Nyantee, Gerald F. Smith, and Caycee Nelson*, acting individually and in concert with one another and with other persons known and unknown to the Grand Jury, purposely and/or knowingly commanded, induced, entreated, or otherwise attempted to persuade another person to engage in conduct which if committed would be a felony, whether as principal or accomplice, with the

purpose of promoting or facilitating the commission of that crime, and under circumstances strongly corroborative of that purpose, **namely the unlicensed possession, importation, exportation, illicit trafficking, Unlawful maintenance of place for drugs or substance, dispatch in transit and transportation of cocaine into Liberia, contrary to §10.3 of the Penal Code and relevant provisions of the Controlled Drug and Substances Act of 2023.**

4. **Nikolas Ivancic** requested, commanded, encouraged, or otherwise solicited the services of Sheik Bashiru Kante, Madam Jewel Howard-Taylor, Michael and Tony to engage in the unlicensed possession, importation, exportation, illicit trafficking, Unlawful maintenance of place for drugs or substance, dispatch in transit and transportation of cocaine into Liberia, contrary to §10.3 of the Penal Code and relevant provisions of the Controlled Drug and Substances Act of 2023.

5. **Taras Zadereiko**, also known as Tony or William Tony, requested, commanded, encouraged, or otherwise solicited the services of Sheik Bashiru Kante, Madam Jewel Howard-Taylor, Gerald F. Smith, Edison M. Brown, Mohammed Alpha Bah to **engage in the unlicensed possession, importation, exportation, illicit trafficking, unlawful maintenance of place for drugs or substance, dispatch in transit, storage, and transportation of cocaine into Liberia, contrary to §10.3 of the Penal Code and relevant provisions of the Controlled Drug and Substances Act of 2023.**

6. **Mihovil Vrhovac**, also identified as "Michael", requested, commanded, encouraged, or otherwise solicited the services of Sheik Bashiru Kante, Madam Jewel Howard-Taylor, Gerald F. Smith, Edison M. Brown, Mohammed Alpha Bah to **engage in the unlicensed possession, importation, exportation, illicit trafficking, unlawful maintenance of place for drugs or substance, dispatch in transit, storage, and transportation of cocaine into Liberia, contrary to §10.3 of the Penal Code and relevant provisions of the Controlled Drug and Substances Act of 2023.**

7. **Jammel V. Jallah's** instructed Christian L. Nyantee to recruit security personnel and arrange the escort for the cocaine movement, and Christian L. Nyantee did recruit Anthony T. Blaye and Wadell W. Kwarbo, who provided the required security escort for the transportation of the cocaine.

8. **Christian L. Nyantee** requested Anthony T. Blaye, Wadell W. Kwarbo, and Janior to provide an escort for the cocaine, and Anthony T. Blaye, Wadell W. Kwarbo, and Albenigo Janior provided the escort for the transportation of the cocaine.

9. **Caycee Nelson** requested Mark Kuiah's assistance to provide easy access at the RIA and Mark Kuiah accepted the offer and later received US\$50,000.00 representing partial payment of the agreed US\$250,000.00.

10. **Gerald F. Smith** knowingly, willingly and intentionally solicited, induced and assigned NSA Security agents Franklin K. Jallabah, Prince Jaryenneh, and Eki Walters to provide security escort services on multiple occasions for the transportation, shipments and exportation of unlicensed drugs or substances out of Liberia. The operation was organized in separate segments, and role of Gerald F. Smith was to arranging security escorts for the transporation, shipment and exportation of unlicensed drugs or substances from Liberia.

11. **Mark Quiah.** Mark Kuiah recruited F. Augustine Claudius Tamba, Deputy Director General of LCAA, and Abner Wanah Yonly, Sr., Manager, James Spriggs Payne Airfield and Jammel V. Jallah gave them (1) cellphone each; while Mark Kuiah and Caycee Nelson received two (2) for Communication. Mark Kuiah knew and had reasons

to know that the cartel trafficking trade was to import cocaine into Liberia for storage, transportation and exportation out of Liberia to Europe and other destinations and accepted to provide the required assistance for the agreed fee of US\$250,000.00.

12. That Chapter 10, Subchapter "D", Section 10.3- Criminal Solicitation of the Penal Code provides:

1. *"Offense.* A person is guilty of criminal solicitation if he commands, induces, entreats, or otherwise attempts to persuade another person to engage in conduct which if committed would be a felony, whether as principal or accomplice, with the purpose of promoting or facilitating the commission of that crime, and under circumstances strongly corroborative of that purpose.
2. *Defense.* It is an affirmative defense to a prosecution under this section that, if the criminal objectives were achieved, the defendant would be a victim of the offense or the offense is so defined that his conduct would be inevitably incident to its commission or he otherwise would not be guilty under the statute defining the offense or as an accomplice under section 3.1.
3. *Defense precluded.* It is no defense to a prosecution under this section that the person solicited could not be guilty of the offense because of lack of responsibility or culpability, or other incapacity or defense.
4. *Renunciation and withdrawal.* It is an affirmative defense to a prosecution under this section that the defendant after soliciting another person to commit a felony persuaded him not to do so or otherwise prevented the commission of the felony, under circumstances manifesting a complete and voluntary renunciation of the defendant's criminal intent. A renunciation is not "voluntary and complete" if it is motivated in whole or in part by (a) a belief that a circumstance exists which increases the probability of detection or apprehension of the defendant or another or which makes more difficult the consummation of the crime, or (b) a decision to postpone the crime until another time or to substitute another victim or another but similar objective.
5. *Grading.* Criminal solicitation shall be subject to the penalties provided for attempt in Section 10.1(4)".

THAT THE PLAINTIFF SAYS THAT THE DEFENDANTS HAVE NO AFFIRMATIVE DEFENSE IN THE PREMISES.

COUNT X:

SECTION 15.2, ANTI-MONEY LAUNDERING

1. The General allegations section of this indictment is re-alleged and incorporated by reference as if fully set out herein
2. The Grand Jurors re-allege Counts 1 through 9 of the Indictment mentioned hereinabove.
3. **THAT THE GRAND JURORS OF MONTSERRADO COUNTY, REPUBLIC OF LIBERIA, UPON THEIR OATH, DO HEREBY FIND MORE PROBABLY THAN NOT THAT:** The Defendants, *Tara Zadereiko, alias Tony; Mihovil Vrovac, alias Michael; Srdan Seles, Johann David Garc(E)S Grajales, Edison M. Brown, Mohammed Alpha Bah, Jammell V. Jallah, Christian L. Nyantee, Christopher Saryee, Anthony T. Blaye, Wadell W. Kwarbo, Albenigo Junior, and Madam Jewel Howard-Taylor,* acting individually and in concert with one another and with other persons known and unknown to the Grand Jury, purposely

and/or knowingly committed the offense of Money Laundering by engaging in the illicit trafficking of narcotic drugs, namely cocaine, and the conversion or transfer of the proceeds (money) for the purpose of concealing or disguising the illicit origin of that property, or of aiding one another involved in the commission of the criminal conduct (illicit trafficking of narcotic drugs) to evade the legal consequences of the conduct, acquire, possess or use the proceeds (property), engages directly or indirectly in any transaction which involves the proceeds, **contrary to §15.2 "Money Laundering", Anti Money Laundering, Terrorist Financing, Preventive Measures, and Proceeds of Crime Act, 2021.**

4. During the period from approximately 2021 through 2026, in Montserrado County, Republic of Liberia, and elsewhere, Defendants, acting alone and together with other persons known and unknown to the Grand Jury, knowingly received, possessed, used, concealed, disguised, transferred, converted, disposed of and/or engaged directly or indirectly in transactions involving property which they knew, or had reason to believe or suspect, constituted proceeds of illicit trafficking of cocaine.

5. The Grand Jurors further find that the narcotics-trafficking enterprise described herein generated substantial proceeds from the illicit importation, transportation, possession and trafficking of cocaine, and the enterprise was organized and operated in a manner intended not only to transport cocaine through Liberia but also to generate, transfer, distribute, conceal and utilize the proceeds derived from such criminal conduct.

6. **Nikola Ivancic** is the foreign principal, financier, and organizer of the narcotics enterprise, who provided financial support and transfers associated with the alleged enterprise. Nikola Ivancic, acting through Michael, Tony and Sheik Bashiru Kante, financed Madam Jewel Howar-Taylor trip to Dubai, United Arab Emirates, in the amount of US\$27,000.00; presented Madam Taylor a shopping-gift bag containing US\$45,000.00 and contributed to Madam Taylor's charitable organization (Jewel Starfish Foundation), through Sheik Bashiru Kante US\$75,000.00, all of which were derived from the illicit trafficking of cocaine in Liberia. Following a request from Madam in August 2026, Nikola Ivancic also gave Madam Taylor US\$15,000.00 through Sheik Bashiru Kante. Nikola Ivancic also gave Edison M. Brown and Mohammed Alpha Bah a shopping gift of US\$50,000.00 when they visited him in Dubai.

7. **Taras Zadereiko**, also known as Tony or William Tony, made financial contributions and expenditures associated with the alleged enterprise, including the reported US\$27,000 provided through Sheik Bashiru Kante in connection with Jewel Howard Taylor's Dubai travel. Tony is also associated with the US\$3,000.00 and US\$14,500.00 paid to lease the Roynesville and Cement Road premises that were used as storage facilities for the cocaine importeed into Liberia. These funds were criminal proceeds, property involved in laundering, or funds knowingly used in a transaction prohibited by the applicable statute.

8. **Mihovil Vrhovac**, also identified as Vrovac or Michael, was the Aviation and logistics planner, landing-site reconnaissance participant, and operational coordinator, through whom financial transaction, asset acquisition, payments for the storage facilities were channelled and sent to Liberian operatives.

9. **Srdan Seles** was the physical handler, transporter, and alleged operational participant at the Royesville storage site. He participated in the payment of the rental amount for the storage facility in Roynesville, Montserrado County, Liberia.

10. **Edison M. Brown** operated a brokerage company, made cargo payments, aircraft expenses of US\$9,000.00 deposited into the account of the LCAA for registration of the

aircraft that should have been used to import cocaine into Liberia under the disguise of running a commercial airline business. Edison M. Brown and Mohammed Alpha Bah received US\$50,000.00 from Nikola Ivancic when they visited him in Dubai.

11. **Mohammed Alpha Bah** and Edison M. Brown received US\$50,000.00 from Nikola Ivancic when they visited him in Dubai, UAE.

12. **Jammel V. Jallah** paid Anthony T. Blaye and Wadell W. Kwarbo US\$10,000.00 through Christian L. Nyantee for provision of the security escort to transport the cocaine from Roynesville to Cement Road, VOA Community, Paynesville, Robertsfield Highway, Montserrado County. Jammel V. Jallah also paid Mark Kuiah US\$50,000.00 through Christian L. Nyantee against the agreed service charge of US\$250,000.00 for Mark Kuiah's assistance in the cocaine-trafficking enterprise.

13. **Christian L. Nyantee** received and distributed US\$10,000.00 to Anthony T. Blaye and Wadell W. Kwarbo as compensation for the provision of security escort of the convoy that transported the cocaine from Roynesville to Cement Road, VOA Community, Paynesville, Robertsfield Highway, Montserrado County. The money was proceeds from the illicit trafficking of cocaine imported into Liberia for storage, transportation and exportation out of Liberia by the cartel.

14. **Anthony T. Blaye** received US\$5,000 as compensation for the escort operation. This payment and receipt of the US\$5,000.00 constituted a transaction involving proceeds of crime or another transaction prohibited by the applicable money-laundering statute.

15. **Wadell W. Kwarbo** received US\$5,000 as compensation for the escort operation. This payment and receipt of the US\$5,000.00 constituted a transaction involving proceeds of crime or another transaction prohibited by the applicable money-laundering statute.

16. **Gerald Folley Smith** paid the NSA security agents he assigned to escort the cocaine and received more than US\$80,000.00 from the cartel as compensation for his provision security escort.

17. **Jewel Howard Taylor** was the recipient of financial support and participant in meetings and communications with members of the narcotics enterprise. Her financial dealings with the narcotics enterprise included the US\$27,000.00 associated with travel to Dubai, the US\$45,000.00 shopping-gift, among others. These amounts were paid to Madam Taylor in consideration for her acceptance to use her office as Vice President of the Republic of Liberia provide protection to the cartel in the implementation of its criminal plans. The conduct of the Defendants constituted the acquisition, possession, use, receipt, concealment, disguising, transfer, conversion, disposition and/or direct or indirect transaction involving proceeds of crime within the meaning of **Section 15.2 of the Anti-Money Laundering and Countering Financing of Terrorism Act, 2021**. Taylor's conduct further included participation in, association with, conspiracy to commit, aiding, abetting, facilitating and/or counseling the commission of the foregoing money-laundering acts. The offense of money laundering is punishable as a **first-degree felony**.

18. **Mark Kuiah**. Mark Kuiah former Deputy Director for Operations of the Liberia Civil Aviation Authority (LCAA), was recruited by Cayce Nelson. Mark Kuiah accepted to join the cartel trafficking enterprise and proposed US\$250,000.00 (Two Hundred Fifty Thousand United States Dollars) as compensation for his services. The proposed fee was accepted and the cartel paid him partial payment of US\$50,000.00 (Fifty Thousand United States Dollars). Mark Kuiah recruited F. Augustine Claudius Tamba, Deputy Director General of LCAA, and Abner Wanah Yonly, Sr., Manager, James Spriggs Payne Airfield and Jammel V. Jallah gave them (1) cellphone each; while Mark Kuiah and Caycee Nelson

received two (2) for Communication. Mark Kuiah knew and had reasons to know that the cartel trafficking trade was to import cocaine into Liberia for storage, transportation and exportation out of Liberia to Europe and other destinations and accepted to provide the required assistance for the agreed fee of US\$250,000.00.

19. That Section 15.2 Money Laundering and Terrorist Financing Offenses of the Anti-Money Laundering, Terrorist Financing, Preventive Measures, and Proceeds of Crime Act, 2021, provides:

1. "Offense of Money Laundering: a person or body corporate or other legal entity commits the offense of money laundering if that person knowing or having reason to believe or suspect that property, is the proceeds of crimes:
 - a) Converts or transfers the property for the purpose of concealing or disguising the illicit origin of that property, or of aiding any person involved in the commission of the criminal conduct to evade the legal consequences of the conduct;
 - b) Conceals or disguises the true nature, origin, location, disposition, movement or ownership of or rights with respect to, the property;
 - c) Acquires, possesses or uses the property;
 - d) Engages directly or indirectly in any transaction which involves the property;
 - e) Receives, possesses, conceals, disguises, transfers, converts, disposes of, removes from or brings the property into Liberia; or
 - f) Participates in, associates with or conspires to commit, attempts to commit or aids, abets or facilitates or counsels the commission of any of the above acts.
2. Grading. The offense of money laundering shall be punishable as a first-degree felony".

THAT THE PLAINTIFF SAYS THAT THE DEFENDANTS HAVE NO AFFIRMATIVE DEFENSE IN THE PREMISES.

COUNT XI

Possession and Sale of Physical Objects for Lethal Use

§17.11, Penal Code of Liberia and Part IV, Possession & Use, Subsection 1.19(a) – Prohibition of Possession of Light Weapons

1. The General allegations section of this indictment is re-alleged and incorporated by reference as if fully set out herein
2. The Grand Jurors re-allege Counts 1 through 10 of the Indictment mentioned hereinabove.
3. **THAT THE GRAND JURORS OF MONTSERRADO COUNTY, REPUBLIC OF LIBERIA, UPON THEIR OATH, DO HEREBY FIND MORE PROBABLY THAN NOT THAT:** The Defendants, *Srdan Seles, and Johann David Garc(E)S Grajales*, acting individually and in concert with one another and with other persons known and unknown to the Grand Jury, purposely and/or knowingly **and unlawfully possessed and had under their joint or constructive possession/control, a physical object**

possessed of lethal use, to wit: one (1) Taurus pistol bearing serial number AEJ724411G3C9X19, a light weapon, without being legally authorized to possess or control the same by reason of military or paramilitary service or otherwise under the laws of the Republic of Liberia, contrary to Chapter 17, §17.11, Penal Code of Liberia, and Part IV, §1.19 "Prohibition of Possession of Light Weapons, An Act to Establish Firearms and Ammunition Control of Liberia, 2015.

4. That the said Defendants, SRDAN SELES and JOHANN DAVID GARCES GRAJALES, knowingly possessed and had under their joint or constructive possession/control the said Taurus pistol under circumstances not remotely appropriate to the lawful uses of such physical object, and thereby committed the offense of Possession of Physical Objects for Lethal Use, in violation of §17.11 of the Penal Law of Liberia, a third-degree felony.

5. AND THE GRAND JURORS FURTHER PRESENT that the possession and control of the said Taurus pistol by the Defendants constituted a further violation of Part IV, Possession and Use, subsection 1.19(a), Prohibition of Possession of Light Weapons, which provides that: "No natural person shall have in his/her possession or under his/her control any light weapon."

6. That Chapter 17, §17.11 "Possession and Sale of Physical Objects for Lethal Use" and Part IV, Possession & Use, Subsection 1.19(a) — Prohibition of Possession of Light Weapons of An Act to Establish Firearms and ammunition Control of Liberia, 2015, provide:

7. § 17.11. "Possession and sale of physical objects for lethal use", Penal Code of Liberia.

"A person not legally authorized to do so by the military or paramilitary nature of his service has committed a third degree felony if he is found to be knowingly in possession of or has sold, transferred, given or loaned to another any physical object possessed of lethal use, under circumstances not remotely appropriate to the lawful uses which such physical object may have", and

8. Part IV, Possession & Use, Subsection 1.19(a) — Prohibition of Possession of Light Weapons of An Act to Establish Firearms and ammunition Control of Liberia, 2015,

"Prohibition of Possession of light weapons.

(a) No natural person shall have in his/her possession or under his/her control any light weapon".

(b) Subsection (a) shall not apply to person employed by the AFL or National Security Agencies, acting in the course of his or her employment".

THAT THE PLAINTIFF SAYS THAT THE DEFENDANTS HAVE NO AFFIRMATIVE DEFENSE IN THE PREMISES.

AND THE GRAND JURORS AFORESAID, UPON THEIR OATH AFORESAID DO PRESENT THAT THE HEREINABOVE NAMED DEFENDANTS AFORESAID, DO SAY THAT THE CRIMES OF ILLICIT TRAFFICKING OF CONTROLLED DRUGS OR SUBSTANCES, THE SAID DEFENDANTS DID DO AND COMMIT CONTRARY TO THE FORM, FORCE AND EFFECT OF THE STATUTORY LAWS OF THE REPUBLIC OF LIBERIA IN SUCH CASES MADE AND PROVIDED AND AGAINST THE PEACE AND DIGNITY OF THE SAID REPUBLIC.

1. TRUE BILL
TRUE BILL/IGNORAMUS

3. TRUE BILL
TRUE BILL/IGNORAMUS

5. TRUE BILL
TRUE BILL/IGNORAMUS

2. TRUE BILL
TRUE BILL/IGNORAMUS

4. TRUE BILL
TRUE BILL/IGNORAMUS

6. TRUE BILL
TRUE BILL/IGNORAMUS

WITNESSES

- 1. Peter Johnson
- 2. Rafael A. Wilson
- 3. Louis Joco Jayjay
- 4. Documentary evidence

ADDRESS

Liberia National Police
Liberia National Police
Monrovia, Liberia



Amara Konneh
FOREMAN

08/10/25



Cllr. Richard J. Scott, Jr.
County Attorney
Montserrado County, R.L.

Filed on this 08 day of October A. D. 2026.



Clerk of Court
Criminal Court "A"