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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

PAUL CALDER LEROUX,
a/k/a "Bernard John Bowlins,"
a/k/a "John Smith,"

Defendant.
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INFORMATION

S2 12 Cr. 489 (RPP)

COUNT ONE

The United States Attorney charges:

1. From at least in or about April 2012 through in or about September 2012, in Brazil, the Philippines, Liberia, and elsewhere, PAUL CALDER LEROUX, a/k/a "Bernard John Bowlins," a/k/a "John Smith," the defendant, who was arrested and first brought to the Southern District of New York, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that PAUL CALDER LEROUX, a/k/a "Bernard John Bowlins," a/k/a "John Smith," the defendant, and others known and unknown, would and did import into the United States from a place outside thereof a controlled substance, to wit, five hundred grams and more of a mixture or substance containing a detectable amount of

methamphetamine, in violation of Sections 812, 952(a), 960(a)(1), and 960(b)(1)(H) of Title 21, United States Code.

3. It was further a part and an object of the conspiracy that PAUL CALDER LEROUX, a/k/a "Bernard John Bowlins," a/k/a "John Smith," the defendant, and others known and unknown, would and did distribute a controlled substance, to wit, five hundred grams and more of a mixture or substance containing a detectable amount of methamphetamine, intending and knowing that such substance would be imported into the United States from a place outside thereof, in violation of Sections 812, 959, 960(a)(3) and 960(b)(1)(H) of Title 21, United States Code.

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

COUNT TWO

The United States Attorney further charges:

4. From at least in or about 2009 up to and including in or about September 2012, PAUL CALDER LEROUX, a/k/a "Bernard John Bowlins," a/k/a "John Smith," the defendant, would and did export, and cause to be exported, reexported, sold, and supplied, directly and indirectly, from the United States, goods, technology, and services intended specifically for use in the production of and for incorporation into technologies and services to be supplied to Iran and the Government of Iran,

without obtaining the required approval of the U.S. Department of the Treasury, Office of Foreign Assets Control; and engaged in transactions for the purpose of evading and avoiding this prohibition, and caused a violation of this prohibition.

5. In furtherance of and as part of committing the offense, PAUL CALDER LEROUX, a/k/a "Bernard John Bowlins," a/k/a "John Smith," the defendant, among other things:

a. participated in soliciting the murder, in or about 2010, of an individual in a country outside the United States;

b. participated in the murder, in or about 2010, of ██████████ in a country outside the United States;

c. participated in the murder, in or about 2010, of ██████████ in a country outside the United States;

d. participated in the murder, in or about 2011, of ████████████████████ in a country outside the United States;

e. caused the murder, in or about 2011, of ██████████ in a country outside the United States;

f. caused the murder, in or about 2011, of ██████████ in a country outside the United States; and

g. solicited the murder, in or about 2011, of an individual in a country outside the United States.

(Title 50, United States Code, Sections 1701 to 1707; Title 31, Code of Federal Regulations, Sections 560.203 and 560.204; Title 18, United States Code, Section 2)

COUNT THREE

The United States Attorney further charges:

6. From at least in or about 2008, up to and including in or about 2011, PAUL CALDER LEROUX, a/k/a "Bernard John Bowlins," a/k/a "John Smith," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Sections 1030(a)(2) and 1030(a)(4).

7. It was a part and an object of the conspiracy that PAUL CALDER LEROUX, a/k/a "Bernard John Bowlins," a/k/a "John Smith," the defendant, and others known and unknown, unlawfully, willfully and knowingly, for purposes of commercial advantage and private financial gain, and in furtherance of a criminal and tortious act in violation of the Constitution and the laws of the United States, intentionally would and did access a computer without authorization, and thereby would and did obtain and attempt to obtain information from a protected computer, the value of which exceeded \$5,000, in violation of Title 18, United States Code, Section 1030(a)(2) and (c)(2)(B).

8. It was further a part and an object of the conspiracy that PAUL CALDER LEROUX, a/k/a "Bernard John Bowlins," a/k/a "John Smith," the defendant, and others known and unknown, knowingly and with intent to defraud, would and did access and attempt to access a protected computer without authorization, and by means of such conduct further the intended fraud and obtain something of value exceeding \$5,000 in a one-year period, in violation of Title 18, United States Code, Section 1030(a)(4) and (c)(3)(A).

(Title 18, United States Code, Section 1030(b))

COUNT FOUR

The United States Attorney further charges:

9. In or about 2008, PAUL CALDER LEROUX, a/k/a "Bernard John Bowlins," a/k/a "John Smith," the defendant, knowing that offenses against the United States had been committed, to wit, securities and commodities fraud in violation of Title 18, United States Code, Section 1348, did receive, relieve, comfort, and assist an offender, in order to prevent the offender's apprehension, trial, and punishment, to wit, LEROUX arranged for the transport and payment of money intended to bribe foreign officials in order to impede the offender's extradition to face criminal charges in the United States.

(Title 18, United States Code, Section 3)

FORFEITURE ALLEGATIONS

With Respect to Count One

10. As a result of committing the controlled substance offense alleged in Count One of this Information, PAUL CALDER LEROUX, a/k/a "Bernard John Bowlins," a/k/a "John Smith," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Information.

With Respect to Counts Two and Three

11. As a result of committing the offenses alleged in Counts Two and Three of this Information, PAUL CALDER LEROUX, a/k/a "Bernard John Bowlins," a/k/a "John Smith," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(B) and Title 28, United States Code, Section 2461, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts Two and Three of this Information.

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Defendant.

INFORMATION

21 U.S.C. § 963; 50 U.S.C. § 1705;
18 U.S.C. §§ 2, 3, & 1030

PREET BHARARA
United States Attorney.
