

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-20191-WILLIAMS(s)

UNITED STATES OF AMERICA

v.

KADEEM STEPHAN MAYNARD,

Defendant.

FACTUAL PROFFER

The United States of America and the defendant, Kadeem Stephan Maynard (hereinafter, "Defendant") hereby stipulate to the following facts, which form the basis for the defendant's guilty plea to Count 1 of the Superseding Indictment, which charges the defendant with conspiracy to import cocaine, in violation of Title 21, United States Code, Sections 963 and 952(a). The Defendant agrees that the United States could prove the below facts beyond a reasonable doubt if the case were to go to trial.

Between March 16, 2022, and April 28, 2022, the Defendant and co-defendants Andrew Alturo Fahie ("Fahie") and Oleanvine Pickering Maynard ("Maynard") (collectively, "the defendants") conspired with each other and a DEA confidential source ("CS"), who the Defendant and his co-defendants believed was a member of the Mexican Sinaloa Cartel, to allow the CS to ship thousands of kilograms of cocaine through the Island of Tortola ("Tortola") in the British Virgin Islands ("BVI") to the United States in exchange for a percentage of the proceeds from the cocaine sales.

The Defendant and his co-defendants used their connections with, and positions of authority in, the government of the BVI to facilitate the CS's drug trafficking scheme. The

Defendant introduced the CS to Maynard, who was the Defendant's mother and managing Director of the BVI Ports Authority. Maynard introduced the CS to Fahie, who was the Premier of the BVI. The Defendant coordinated meetings between the CS, Maynard, and Fahie, and relayed information between the CS, Maynard, and Fahie.

During various meetings between the CS, Maynard, Fahie, and the Defendant, the defendants agreed to allow the CS to port vessels containing 3,000-kilogram loads of cocaine in Tortola for 24-48 hours until the cocaine could be shipped to Puerto Rico en route to the United States. Fahie agreed to bribe officials managing the ports and airports in furtherance of the scheme, and Maynard and the Defendant agreed to obtain the necessary licenses and paperwork authorizing the CS's vessels to port in the BVI without suspicion.

For example, on or about March 16, 2022, the CS met with the Defendant in Tortola. During the meeting, the Defendant stated that he and Maynard were interested in working with the CS and that he would introduce the CS to Maynard. The Defendant also stated that he and Maynard had already started to make the necessary arrangements to carry out the plan.

On another occasion, on or about March 20, 2022, the Defendant arranged a meeting between himself, Maynard and the CS in St. Thomas, U.S. Virgin Islands ("USVI"). During this meeting, the CS told the Defendant and Maynard that he was a member of the Sinaloa Cartel and requested their help moving thousands of kilograms of an illegal substance, which they suspected was cocaine, from Colombia through Tortola with the ultimate destinations of Miami and New York. The CS stated that he required protection and safe passage for the container for 24-48 hours until it could be taken to Puerto Rico. Maynard said that she could assist with obtaining the necessary licenses and paperwork and suggested using shell companies to conceal the payments

that she and the Defendant would receive. Maynard indicated that she had started looking into different licenses to give their scheme the appearance of legitimacy.

The CS proposed a test run of 3,000 kilograms of the illegal substance, which the Defendant and Maynard suspected was cocaine. If that load was successful, the CS said he would ship additional 3,000-kilogram loads over the next four months. The Defendant and Maynard acknowledged that Fahie, as Tortola's Premier, would need to be involved, but the Defendant assured that Maynard could convince Fahie to go along with the plan.

At the end of the meeting, the CS provided Maynard and the Defendant with \$10,000 cash as a gesture of good faith, which she and the Defendant accepted.

On April 7, 2022, the CS met in person with Maynard and Fahie in Tortola, during which Fahie agreed to the CS's proposed cocaine trafficking scheme in exchange for 12% of the proceeds from the sales of the cocaine in Miami and New York, with 2% to be used for bribes. The CS said that a kilogram of cocaine would sell for \$26,000-\$28,000 per kilogram in Miami and \$34,000-\$38,000 per kilogram in New York. Fahie used a calculator to determine that his 10% of a 3,000-kilogram load sold for \$26,000 per kilogram would be \$7.8 million. Fahie, Maynard, and the CS agreed that Fahie and Maynard would meet the CS in Miami where the CS would provide a \$500,000 up front payment to Fahie and a \$200,000 payment to Maynard. Maynard would then fly back to the BVI with the money.

On April 26, 2022, Maynard traveled from the BVI to Miami to meet with Fahie, who had arrived in the United States on April 24, 2022, and the CS. As planned, Maynard boarded a private jet at the Opa Locka executive airport, where the CS showed her Fahie's \$500,000 payment and her \$200,000 payment that she was supposed to bring back to the BVI in furtherance of the scheme.

The parties agree that these facts, which do not include all of the facts known to the United States and to the Defendant, are sufficient to prove Count 1 of the Superseding Indictment.

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

Date: 6/12/23

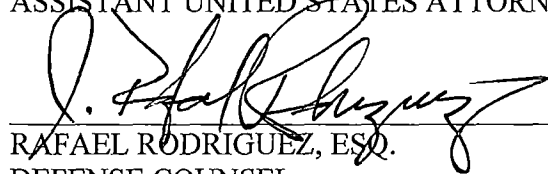
By:



KEVIN D. GERARDE
ASSISTANT UNITED STATES ATTORNEY

Date: 6/12/23

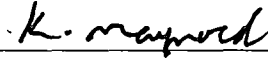
By:



RAFAEL RODRIGUEZ, ESQ.
DEFENSE COUNSEL

Date: 6/12/23

By:



KADEEM STEPHAN MAYNARD
DEFENDANT