

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on March 16, 2023

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	GRAND JURY ORIGINAL
	:	
KENNETH ADEMOLA OLUGBENGA, KHALI AHMED BROWN, also known as "Migo Lee,"	:	VIOLATIONS: 21 U.S.C. § 846 (Conspiracy to Distribute and Possess with Intent to Distribute 100 Kilograms or More of Marijuana, 400 Grams or More of Fentanyl, and a Mixture and Substance Containing a Detectable Amount of Cocaine Base);
MIASIAH JAMAL BROWN, also known as "Michael Jamal Crawford," TRISTAN MILES WARE, also known as "Greedy," HERMAN ERIC-BIBMIN SIGNOU, also known as "Herman Signour,"	:	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(D) (Unlawful Possession with Intent to Distribute Marijuana); 18 U.S.C. § 924(c)(1)(A)(i) (Using, Carrying, and Possessing a Firearm During a Drug Trafficking Offense); 18 U.S.C. § 922(g)(1) (Unlawful Possession of a Firearm by a Person Convicted of a Crime Punishable by Imprisonment for a Term Exceeding One Year); 18 U.S.C. § 924(c)(1) (Using, Carrying, and Possessing a Firearm During a Drug Trafficking Offense);
CAMERON XAVIER REID,	:	22 D.C. Code § 402 (Assault with a Dangerous Weapon); 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) (Unlawful Possession with Intent to Distribute Fentanyl); 18 U.S.C. § 924(c)(1)(B)(ii) (Using, Carrying, and Possessing a Machinegun During a Drug Trafficking Offense); 18 U.S.C. § 922(o) (Unlawful Possession of a Machinegun);
AARON DEANDRE MERCER, also known as "Curby," DAVID PENN, also known as "Turtle," RONALD LYNN DORSEY, also known as "Ron G," ANTONIO REGINALD BAILEY, also known as "Boy Boy," and "Fellow King," ANTHONY TRAYON BAILEY, also known as "Fat Ant," and "Bizzle," and ANGEL ENRIQUE SUNCAR, also known as "Coqui,"	:	
Defendants.	:	

	<ul style="list-style-type: none"> : 18 U.S.C. § 922(k) : (Possession of a Firearm with An Obliterated : Serial Number); : 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(vi) : (Unlawful Possession with Intent to : Distribute 40 Grams or More of : Fentanyl); : 18 U.S.C. § 922(a)(1)(A) : (Engaging in the Business of Dealing in : Firearms Without a License); : 22 D.C. Code § 4503(a)(1) : (Unlawful Possession of a Firearm (Prior : Conviction)); : 18 U.S.C. § 1956(h) (Conspiracy to Commit Money Laundering); 22 D.C. Code § 1805 (Aiding and Abetting); <p>FORFEITURE:</p> <ul style="list-style-type: none"> 18 U.S.C. § 982(a); 18 U.S.C. § 924(d); 21 U.S.C. §§ 853(a) and (p); 28 U.S.C. § 2461(c)
--	---

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment, on or about the date ranges, and in and around the approximate locations, stated below:

INTRODUCTION

The Kennedy Street Crew, or “KDY,” is a group of individuals operating as a “crew,” or “street crew,” in and around the 100-1200 blocks of Kennedy Street in Northwest, Washington, D.C., as well as the surrounding streets. The Kennedy Street Neighborhood contains several commercial businesses, public recreation centers, residences, and day care facilities that are surrounded by prolific “open air” drug trafficking markets operated by KDY.

Members of KDY include Defendants **KENNETH ADEMOLA OLUGBENGA, KHALI AHMED BROWN, also known as "Migo Lee," MIASIAH JAMAL BROWN, also known as "Michael Jamal Crawford," TRISTAN MILES WARE, also known as "Greedy," HERMAN ERIC-BIBMIN SIGNOU, also known as "Herman Signour," CAMERON XAVIER REID,**

AARON DEANDRE MERCER, also known as "Curby," DAVID PENN, also known as "Turtle," RONALD LYNN DORSEY, also known as "Ron G," ANTONIO REGINALD BAILEY, also known as "Boy Boy," also known as "Fellow King," ANTHONY TRAYON BAILEY, also known as "Fat Ant," also known as "Bizzle," and ANGEL ENRIQUE SUNCAR, also known as "Coqui."

COUNT ONE

The General Allegations of this Indictment are re-alleged and fully incorporated here by reference.

Beginning on or about June 2019, and continuing through at least June 2023, within the District of Columbia and elsewhere, defendants **KENNETH ADEMOLA OLUGBENGA, KHALI AHMED BROWN, also known as "Migo Lee," MIASIAH JAMAL BROWN, also known as "Michael Jamal Crawford," TRISTAN MILES WARE, also known as "Greedy," HERMAN ERIC-BIBMIN SIGNOU, also known as "Herman Signour," CAMERON XAVIER REID**

AARON DEANDRE MERCER, also known as "Curby," DAVID PENN, also known as "Turtle," RONALD LYNN DORSEY, also known as "Ron G," ANTONIO

REGINALD BAILEY, also known as “Boy Boy,” and “Fellow King,” ANTHONY TRAYON BAILEY, also known as “Fat Ant,” and “Bizzle,” and ANGEL ENRIQUE SUNCAR, also known as “Coqui,” did knowingly and willfully combine, conspire, confederate, and agree together and with other persons both known and unknown to the Grand Jury, to unlawfully, knowingly and intentionally distribute and possess with intent to distribute 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, 400 grams or more of a mixture and substance containing a detectable amount of Fentanyl, a Schedule II narcotic drug controlled substance, and a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(vii), (b)(1)(B)(vi), (b)(1)(A)(vi), (b)(1)(C), and (b)(1)(D).

Manner and Means of the Conspiracy:

KDY members engage in drug trafficking, including but not limited to the distribution of marijuana, Fentanyl, and cocaine base, also known as “crack.” Among the shared purposes of the conspiracy, KDY members confederate to coordinate the sales of controlled substances in and around the Kennedy Street Neighborhood, including at open-air drug markets.

KDY members regularly travel to the Western United States, including the Central and Northern Districts of California, to facilitate the bulk smuggling of controlled substances into the Washington D.C. area for re-sale at significant profit.

KDY members maintain, enhance, and secure their drug trafficking operation through the acquisition, carrying, and use of firearms to protect territory and contraband and to promote members’ activities and reputation, including through intimidation and acts of violence.

KDY members conspire to conceal the illicit source of their proceeds through the establishment of shell businesses and other methods of laundering drug proceeds both known and unknown to the Grand Jury.

Quantity of Narcotics Involved in the Conspiracy:

With respect to defendant **KENNETH ADEMOLA OLUGBENGA**, his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, a mixture and substance containing a detectable amount of Fentanyl, a Schedule II narcotic drug controlled substance, and a mixture and substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(vii), and 841(b)(1)(C).

With respect to defendant **KHALI AHMED BROWN, also known as "Migo Lee,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, and 400 grams or more of a mixture and substance containing a detectable amount of Fentanyl, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(vii), and 841(b)(1)(A)(vi).

With respect to defendant **TRISTAN MILES WARE, also known as "Greedy,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

With respect to defendant **HERMAN ERIC-BIBMIN SIGNOU, also known as "Herman Signour,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii).

With respect to defendant **CAMERON XAVIER REID,** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of

other members of the narcotics conspiracy charged in Count One, involved 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii).

With respect to defendant **AARON DEANDRE MERCER, also known as "Curby,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, 400 grams or more of a mixture and substance containing a detectable amount of Fentanyl, a Schedule II narcotic drug controlled substance, and a mixture and substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D), 841(b)(1)(A)(vi), and 841(b)(1)(C).

With respect to defendant **DAVID PENN, also known as "Turtle,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, 40 grams or more of a mixture and substance containing a detectable amount of Fentanyl, a Schedule II narcotic drug controlled substance, and a mixture and substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D), 841(b)(1)(B)(vi), and 841(b)(1)(C).

With respect to defendant **RONALD LYNN DORSEY, also known as "Ron G,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, and a mixture and substance containing a detectable amount of cocaine base, also known as "crack," a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D), and 841(b)(1)(C).

With respect to defendant **ANTONIO REGINALD BAILEY, also known as "Boy Boy," and "Fellow King,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

With respect to defendant **ANTHONY TRAYON BAILEY, also known as "Fat Ant," and "Bizzle,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged

in Count One, involved a mixture and substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

With respect to defendant **ANGEL ENRIQUE SUNCAR, also known as "Coqui,"** his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, and a mixture and substance containing a detectable amount of Fentanyl, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(D) and 841(b)(1)(C).

(Conspiracy to Distribute and Possess with Intent to Distribute One Hundred Kilograms or More of Marijuana, Four Hundred Grams or More of Fentanyl, and a Mixture and Substance Containing a Detectable Amount of Cocaine Base, in violation of Title 21, United States Code, Section 846)

COUNT TWO

On or about June 20, 2022, within the District of Columbia, **TRISTAN MILES WARE, also known as "Greedy,"** did unlawfully, knowingly, and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(Unlawful Possession with Intent to Distribute of Marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D))

COUNT THREE

On or about June 20, 2022, within the District of Columbia, **TRISTAN MILES WARE, also known as "Greedy,"** knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in the Superior Court for the District of Columbia, Criminal Case No. 2021-CF2-004535, did unlawfully and knowingly receive and possess a firearm

that is, a Springfield Armory XDM-9, 9mm handgun, bearing serial number MG93810, which had been possessed, shipped and transported in and affecting interstate and foreign commerce.

(Unlawful Possession of a Firearm by a Person Convicted of a Crime Punishable by Imprisonment for a Term Exceeding One Year, in violation of Title 18, United States Code, Section 922(g)(1))

COUNT FOUR

On or about June 20, 2022, within the District of Columbia, **TRISTAN MILES WARE, also known as "Greedy,"** did unlawfully and knowingly use, and carry during and in relation to, and possess in furtherance of, a drug trafficking offense, for which he may be prosecuted in a court of the United States, that is Counts One and Three of this Indictment which are incorporated herein by reference, a firearm, that is, a Springfield Armory XDM-9, 9mm handgun, bearing serial number MG93810.

(Using, Carrying and Possessing a Firearm During a Drug Trafficking Offense, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i))

COUNT FIVE

COUNT SIX

On or about October 10, 2022, within the District of Columbia and elsewhere, **MIASIAH JAMAL BROWN, also known as "Michael Jamal Crawford,"** did unlawfully and knowingly use, and carry during and in relation to, and possess in furtherance of, a drug trafficking offense within the District of Columbia, for which he may be prosecuted in a court of the United States, that is Count One of this Indictment which is incorporated herein by reference, a firearm, that is, a Glock 45 handgun, bearing serial number KKN758.

(Using, Carrying and Possessing a Firearm During a Drug Trafficking Offense, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i))

COUNT SEVEN

On or about November 18, 2022, within the District of Columbia, **KHALI AHMED BROWN, also known as "Migo Lee,"** assaulted another person with a dangerous weapon, that is, a pistol.

(Assault with A Dangerous Weapon and Aiding and Abetting, in violation of Title 22, District of Columbia Code, Sections 402 and 1805)

COUNT EIGHT

On or about January 26, 2023, within the District of Columbia, **KHALI AHMED BROWN, also known as "Migo Lee,"** did unlawfully, knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of Fentanyl, a Schedule II narcotic drug controlled substance.

(Unlawful Possession With Intent to Distribute Fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))

COUNT NINE

On or about January 26, 2023, within the District of Columbia, **KHALI AHMED BROWN, also known as "Migo Lee,"** did unlawfully, knowingly and intentionally possess with

intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(Unlawful Possession With Intent to Distribute Marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D))

COUNT TEN

On or about January 26, 2023, within the District of Columbia, **KHALI AHMED BROWN, also known as "Migo Lee,"** did unlawfully and knowingly use, and carry during and in relation to, and possess in furtherance of a drug trafficking offense, for which he may be prosecuted in a court of the United States, that is, Counts One, Eight and Nine of this Indictment, which are incorporated herein by reference, a machinegun as defined by Title 26, United States Code, Section 5845(b), that is, a Glock 17 9mm handgun with an obliterated serial number with a machinegun conversion device, a weapon which shot, and was designed to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger, as well as a Glock 29 10mm handgun, and a Glock 23 .40 caliber handgun,.

(Using, Carrying, and Possessing a Machinegun and Firearm During a Drug Trafficking Offense, in violation of Title 18, United States Code, Sections 924(c)(1)(B)(ii) and 924(c)(1)(A)(i))

COUNT ELEVEN

COUNT TWELVE

COUNT THIRTEEN

On or about January 26, 2023, within the District of Columbia, **KHALI AHMED BROWN, also known as "Migo Lee,"** did knowingly and unlawfully possess a machinegun as defined by Title 26, United States Code, Section 5845(b), that is, a Glock 17, 9mm handgun with an obliterated serial number with a machinegun conversion device, a weapon which shot, and was designed to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger.

(**Unlawful Possession of a Machinegun**, in violation of Title 18, United States Code, Section 922(o))

COUNT FOURTEEN

COUNT FIFTEEN

COUNT SIXTEEN

COUNT SEVENTEEN

On or about January 26, 2023, within the District of Columbia, **KHALI AHMED BROWN, also known as "Migo Lee,"** did unlawfully, knowingly and intentionally receive and possess a firearm, that is, a Glock 17, 9mm handgun, from which the serial number and other

identification required by law had been obliterated, removed, changed, and altered, and which had been shipped and transported in interstate and foreign commerce.

(Possession of a Firearm with an Obliterated Serial Number, in violation of Title 18, United States Code, Section 922(k))

COUNT EIGHTEEN

On or about January 30, 2023, within the District of Columbia, **DAVID PENN, also known as "Turtle,"** did unlawfully, knowingly, and intentionally possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of Fentanyl, a Schedule II narcotic drug controlled substance.

(Unlawful Possession With Intent to Distribute 40 Grams or More of Fentanyl, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(B)(vi))

COUNT NINETEEN

On or about January 30, 2023, within the District of Columbia, **DAVID PENN, also known as "Turtle,"** did unlawfully and knowingly use, and carry during and in relation to, and possess in furtherance of, a drug trafficking offense, for which he may be prosecuted in a court of the United States, that is, Counts One and Eighteen of this Indictment, which are incorporated herein by reference, a firearm, that is, a Glock 32, .357 Sig Sauer handgun.

(Using, Carrying and Possessing a Firearm During a Drug Trafficking Offense, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i))

COUNT TWENTY

From on or about January 31, 2023, to at least February 23, 2023, within the District of Columbia, **DAVID PENN, also known as "Turtle,"** who is not a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

(Engaging in the Business of Dealing in Firearms Without a License, in violation of Title 18, United States Code, Section 922(a)(1)(A))

COUNT TWENTY-ONE

On or about February 3, 2023, within the District of Columbia, **DAVID PENN, also known as "Turtle,"** knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in the Superior Court for the District of Columbia, Criminal Case No. 2018-CF2-015584, did unlawfully and knowingly receive and possess a firearm, that is, a Glock 32, .357 Sig Sauer handgun, bearing serial number WFS956, which had been possessed, shipped and transported in and affecting interstate and foreign commerce.

(Unlawful Possession of a Firearm by a Person Convicted of a Crime Punishable by Imprisonment for a Term Exceeding One Year, in violation of Title 18, United States Code, Section 922(g)(1))

COUNT TWENTY-TWO

On or about February 3, 2023, within the District of Columbia, **DAVID PENN, also known as "Turtle,"** did unlawfully, knowingly, and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(Unlawful Possession With Intent to Distribute of Marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D))

COUNT TWENTY-THREE

On or about February 3, 2023, within the District of Columbia, **DAVID PENN, also known as "Turtle,"** did unlawfully, knowingly, and intentionally possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of Fentanyl, a Schedule II narcotic drug controlled substance.

(Unlawful Possession With Intent to Distribute 40 Grams or More of Fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi))

COUNT TWENTY-FOUR

On or about February 3, 2023, within the District of Columbia, **DAVID PENN, also known as "Turtle,"** did unlawfully and knowingly use, and carry during and in relation to, and possess in furtherance of a drug trafficking offense, for which he may be prosecuted in a court of the United States, that is, Counts One, Twenty-Two, and Twenty-Three of this Indictment, which are incorporated herein by reference, a machinegun as defined by Title 26, United States Code, Section 5845(b), that is, a Glock 32, .357 Sig Sauer handgun, bearing serial number WFS956, with a machinegun conversion device, a weapon which shot, and was designed to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger.

(Using, Carrying, and Possessing a Machinegun During a Drug Trafficking Offense, in violation of Title 18, United States Code, Section 924(c)(1)(B)(ii))

COUNT TWENTY-FIVE

On or about February 20, 2023, within the District of Columbia, **KENNETH ADEMOLA OLUGBENGA,** did unlawfully, knowingly, and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(Unlawful Possession With Intent to Distribute Marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D))

COUNT TWENTY-SIX

On or about February 20, 2023, within the District of Columbia, **KENNETH ADEMOLA OLUGBENGA,** did unlawfully and knowingly use, and carry during and in relation to, and possess in furtherance of, a drug trafficking offense, for which he may be prosecuted in a court of the United States, that is Counts One and Twenty-Five of this Indictment, which are incorporated herein by reference, a firearm, that is, a Glock 29, 10mm handgun, bearing serial number BWEN433.

(Using, Carrying and Possessing a Firearm During a Drug Trafficking Offense, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i))

COUNT TWENTY-SEVEN

On or about February 20, 2023, within the District of Columbia, **KENNETH ADEMOLA OLUGBENGA**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in San Mateo County, California, Criminal Case No. 20-NF-008561-A, did unlawfully and knowingly receive and possess a firearm that is, a Glock 29, 10mm handgun, bearing serial number BWEN433, which had been possessed, shipped and transported in and affecting interstate and foreign commerce.

(Unlawful Possession of a Firearm by a Person Convicted of a Crime Punishable by Imprisonment for a Term Exceeding One Year, in violation of Title 18, United States Code, Section 922(g)(1))

COUNT TWENTY-EIGHT

On or about March 23, 2023, within the District of Columbia, **AARON DEANDRE MERCER, also known as "Curby,"** did unlawfully, knowingly, and intentionally possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of Fentanyl, a Schedule II narcotic drug controlled substance.

(Unlawful Possession with Intent to Distribute 40 Grams or More of Fentanyl, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(B)(vi))

COUNT TWENTY-NINE

COUNT THIRTY

COUNT THIRTY-ONE

COUNT THIRTY-TWO

The General Allegations of this Indictment are re-alleged and fully incorporated here by reference.

Beginning on or about June 2019, and continuing through at least June 2023, in the District of Columbia and elsewhere, **KENNETH ADEMOLA OLUGBENGA**

RONALD LYNN DORSEY,

also known as "Ron G," and

did knowingly and willfully combine, conspire, confederate and agree with other persons, both known and unknown to the grand jury, to violate 18 U.S.C. Section 1956(a)(1)(B)(i),

by conducting and attempting to conduct financial transactions affecting interstate commerce, that is, deposits, withdrawals and transfers of funds and monetary instruments, whose transactions involved the proceeds of one or more specified unlawful activities, that is, distribution or possession with the intent to distribute controlled substances, and conspiracy thereof, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1), knowing that the property involved in such financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity.

(Conspiracy to Commit Money Laundering, in violation of Title 18, United States Code, Section 1956(h))

FORFEITURE ALLEGATION

1. Upon conviction of the offenses alleged in Counts One, Two, Eight, Nine, Eleven, Fifteen, Eighteen, Twenty-Two, Twenty-Three, Twenty-Five, Twenty-Eight, and Twenty-Nine of this Indictment, the defendants shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of these offenses; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of these offenses. The United States will also seek a forfeiture money judgment against the defendants equal to the value of any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of these offenses.

2. Upon conviction of any of the offenses alleged in Counts Three, Four, Five, Six, Ten, Twelve, Thirteen, Sixteen, Seventeen, Nineteen, Twenty-One, Twenty-Four, Twenty-Six, Twenty-Seven, and Thirty of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section

2461(c), any firearm and ammunition involved in or used in the knowing commission of these offenses, including but not limited to a Springfield Armory XDM-9, 9mm handgun, bearing serial number MG93810; a Glock 26 handgun bearing serial number BLED650; a Glock 45 handgun bearing serial number KKN758; a Glock 17 9mm handgun with an obliterated serial number and a machinegun conversion device; a Glock 29 10mm handgun; a Glock 23 .40 caliber handgun; a privately manufactured firearm (PMF) AR-style .223 caliber pistol, with a machinegun conversion device; a Draco 7.62 x 39mm pistol; a Glock 45 9mm handgun; a Glock 17 9mm handgun; a Glock 32 .357 Sig Sauer handgun bearing serial number WFS956 with a machinegun conversion device; a Glock 29 10mm handgun bearing serial number BWEN433; and a Glock 19 handgun bearing serial number DWGE081.

3. Upon conviction of any of the offenses alleged in Counts Thirteen, Fourteen, and Twenty of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in or used in the willful commission of these offenses, including but not limited to a privately manufactured firearm (PMF) AR-style .223 caliber pistol, with a machinegun conversion device; a Glock 17 9mm handgun with an obliterated serial number and a machinegun conversion device; a Pioneer Arms Corp 7.62 caliber semi-automatic pistol grip rifle, model 'HELLPUP' bearing serial number PAC113439220; and a privately manufactured firearm (PMF) AR-variant pistol equipped with a Palmetto State Armory barrel.

4. Upon conviction of the offense alleged in Count Thirty-Two of this Indictment, the defendants shall forfeit to the United States any property, real or personal, involved in this offense, or any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1). The United States will also seek a forfeiture money judgment against the defendant(s)

equal to the value of any property, real or personal, involved in this offense, or any property traceable to such property.

5. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the defendants shall forfeit to the United States any other property of the defendants, up to the value of the property described above, pursuant to 21 U.S.C. § 853(p).

(Criminal Forfeiture, pursuant to Title 18, United States Code, Sections 982(a) and 924(d), Title 21, United States Code, Sections, 853(a), 853(p), and Title 28, United States Code, Section 2461(c))

A TRUE BILL;

FOREPERSON.

Matthew M. Graves/CCW

Attorney of the United States in
and for the District of Columbia.