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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, : **VERIFIED COMPLAINT  
FOR FORFEITURE**

Plaintiff, : 25 Civ. 1019

- v - :  
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ALL RIGHT, TITLE AND INTEREST IN THE  
REAL PROPERTY AND APPURTENANCES :  
THERETO KNOWN AS 3267 DECATUR  
AVENUE, BRONX, NEW YORK 10467, :  
LISTED AS BLOCK 3351, LOT 49 IN THE  
OFFICE OF THE COUNTY CLERK AND :  
REGISTER OF BRONX COUNTY, NEW YORK :  
:

Defendant-*in-rem*. :  
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Plaintiff United States of America, by its attorney, Danielle R. Sassoon, United States Attorney for the Southern District of New York, and in accordance with Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, for its verified complaint alleges as follows:

**JURISDICTION AND VENUE**

1. This is a civil action *in rem* commenced by the United States of America seeking the forfeiture of the real property and appurtenances thereto known as 3267 Decatur Avenue, Bronx, New York 10467, listed as Block 3351, Lot 49 in the Office of the County Clerk

and register of Bronx County, New York (the “Defendant Property”). The full legal description of the Defendant Property is attached and incorporated hereto as Exhibit A.

2. The Defendant Property is subject to forfeiture pursuant to Title 18, United States Code, Section 985 and Title 21, United States Code, Section 881(a)(7), because there is probable cause to believe that the Defendant Property was used, or intended to be used, in the sale or to facilitate the sale of a controlled substance.

3. This Court has jurisdiction pursuant to Title 28, United States Code, Sections 1345 and 1355.

4. Venue lies in the Southern District of New York pursuant to Title 28, United States Code, Section 1355 because the acts and omissions giving rise to the forfeiture took place in the Southern District of New York.

5. Venue is also proper pursuant to Title 28, United States Code, Section 1395 because the Defendant Property<sup>1</sup> is located in the Southern District of New York.

### **FACTUAL ALLEGATIONS**

6. Since in or about April 2024, law enforcement agents with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) and the New York City Police Department (“NYPD”) (collectively, the “Investigators”), have been conducting an investigation into the Defendant Property, and the activities of an individual known as Dajun Knowles (“Knowles”),

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<sup>1</sup> Based on a review of records relating to the Defendant Property, the Defendant Property is currently in probate proceedings after the most recent owner of the Defendant Property died in or about July 2020. It is also part of a foreclosure action since 2022. According to law enforcement, abandoned homes are frequently taken over by gang members and drug traffickers who change the locks and use the homes as their own while they are otherwise unoccupied by a true owner.

among others, who appear to be using the Defendant Property as a stash house for drug trafficking and firearms.

**The Social Media Posts**

7. Beginning in or about March 2024, Investigators learned that Knowles and other individuals claimed on social media to be members of the “Drilly Gang.”

8. The Investigators learned that members of the Drilly Gang were using the Defendant Property as headquarters of operations, including as a location to film rap videos in furtherance of the Drilly Gang.

9. Specifically, on or about March 29, 2024, a YouTube video was posted by a YouTube account with username “OFFICIAL DRILLY ENT” (the “March 2024 Rap Video”), which indicated that the artists included users with several Instagram handles, including @dg\_daedae\_gzz (the “Knowles Instagram Account”).

10. Between in or around March 2024 and in or around October 2024, the Knowles Instagram Account contained publicly-available videos and photographs. Investigators compared these videos and photographs posted to the Knowles Instagram Account with law enforcement photographs of Knowles, which showed that Knowles is the user of the Knowles Instagram Account.

11. The opening shot of the March 2024 Rap Video claims that the weapons/drugs used in the video are props designed by prop specialists. However, according to Investigators, such warnings in YouTube videos are frequently false, self-exculpatory and self-serving statements.

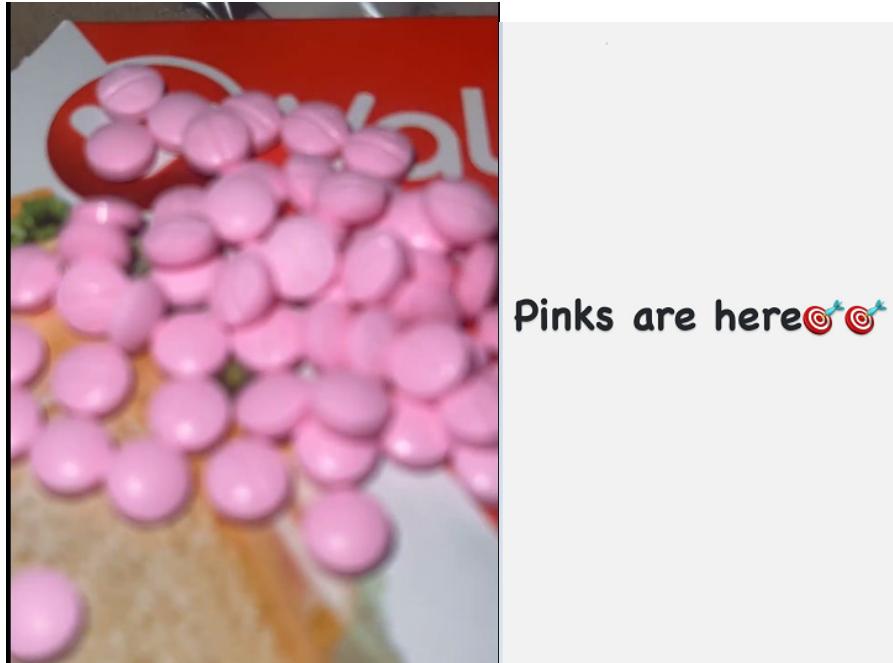
12. The March 2024 Rap Video contains numerous scenes of Knowles and other unidentified individuals in a room of a house containing cloud-shaped structures on the ceiling (the “Cloud Room”).

13. Among other things, the March 2024 Rap Video depicts these individuals possessing drugs and weapons in the Cloud Room as well as showing Knowles lighting a marijuana blunt.

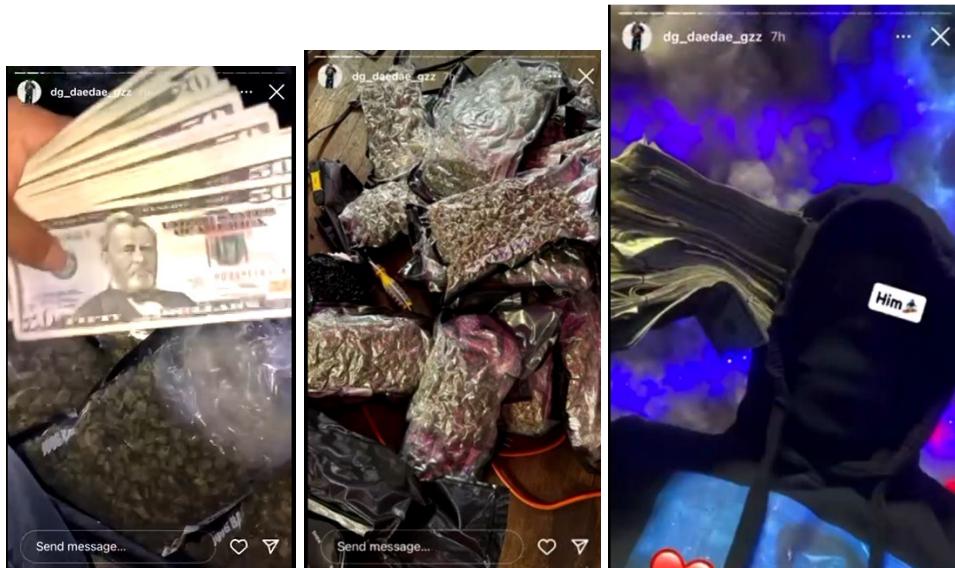
14. The March 2024 Rap Video also contains a view of the front door of the Defendant Property, with the front door containing the numbers “3267” - the address of the Defendant Property - clearly visible, with the cloud-like structures of the Cloud Room in the background.

15. Upon a review of public posts on the Knowles Instagram Account, Investigators determined that Knowles and others appeared in various posts depicting them to be engaged in the sale of controlled substances and the possession of numerous firearms, including the following:

a. On or about October 29, 2024, one post depicted numerous pink pills with the caption: “Pinks are here.” According to Investigators, “pinks” are a term used by drug dealers to refer to oxycodone pills, which are frequently colored pink and have a line down the middle like those depicted in this post. The post is depicted below:



b. On or about October 29, 2024, there were posts depicting what appeared to be large quantities of marijuana, currency and firearms, including one post depicting an individual holding a large stack of what appears to be \$50 bills in front of what appears to be packages of marijuana. Several had the appearance of the cloud-like structures in the background that match the Cloud Room in the Defendant Property. The posts are depicted below:





c. On or about August 21, 2024, the Knowles Instagram Account posted a video containing large quantities of marijuana with the caption: “What’s my name? TF is my name? Da [f-ing] [emoji for plug].” The post is depicted below:



**The Investigation and Search Warrant**

16. In or about October 2024, Investigators conducted surveillance of the Defendant Property and the neighboring vicinity, and observed the following:

a. On or about October 22, 2024, Investigators observed an individual matching the physical appearance of Knowles exit the Defendant Property and get on a black scooter.

b. On or about October 24, 2024, Investigators observed the door to the Defendant Property open and confirmed that the Cloud Room is inside of the Defendant Property.

c. On or about October 24, 2024, approximately two blocks away from the Defendant Property, the Investigators observed a makeshift open-air marijuana dispensary named “Beverly Hills Exotics”<sup>2</sup> that had been set up at 330 East Gun Hill Road, Bronx, New York (the “Gun Hill Road Property”), which contained a poster with weights and prices of various marijuana-related products.

d. During the surveillance at the Gun Hill Road Property, Investigators observed a grey Honda Accord bearing NY license plate KVT3698 (the “Vehicle”) parked near the sign for “Beverly Hills Exotics” at the Gun Hill Road Property and saw an individual enter the passenger side door of the Vehicle and conduct a hand-to-hand transaction with another individual, which appeared to be consistent with a drug transaction.

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<sup>2</sup> The term “Exotics” frequently refers to marijuana products, and “Nicks and Dimes” typically refers to \$5 and \$10 bags of controlled substances.

e. According to law enforcement records, on or about January 1, 2023, Knowles was issued a moving violation summons while driving the Vehicle.

f. On or about October 24, 2024, Investigators again observed Knowles exit the Defendant Property and stand on the sidewalk outside of the Defendant Property.

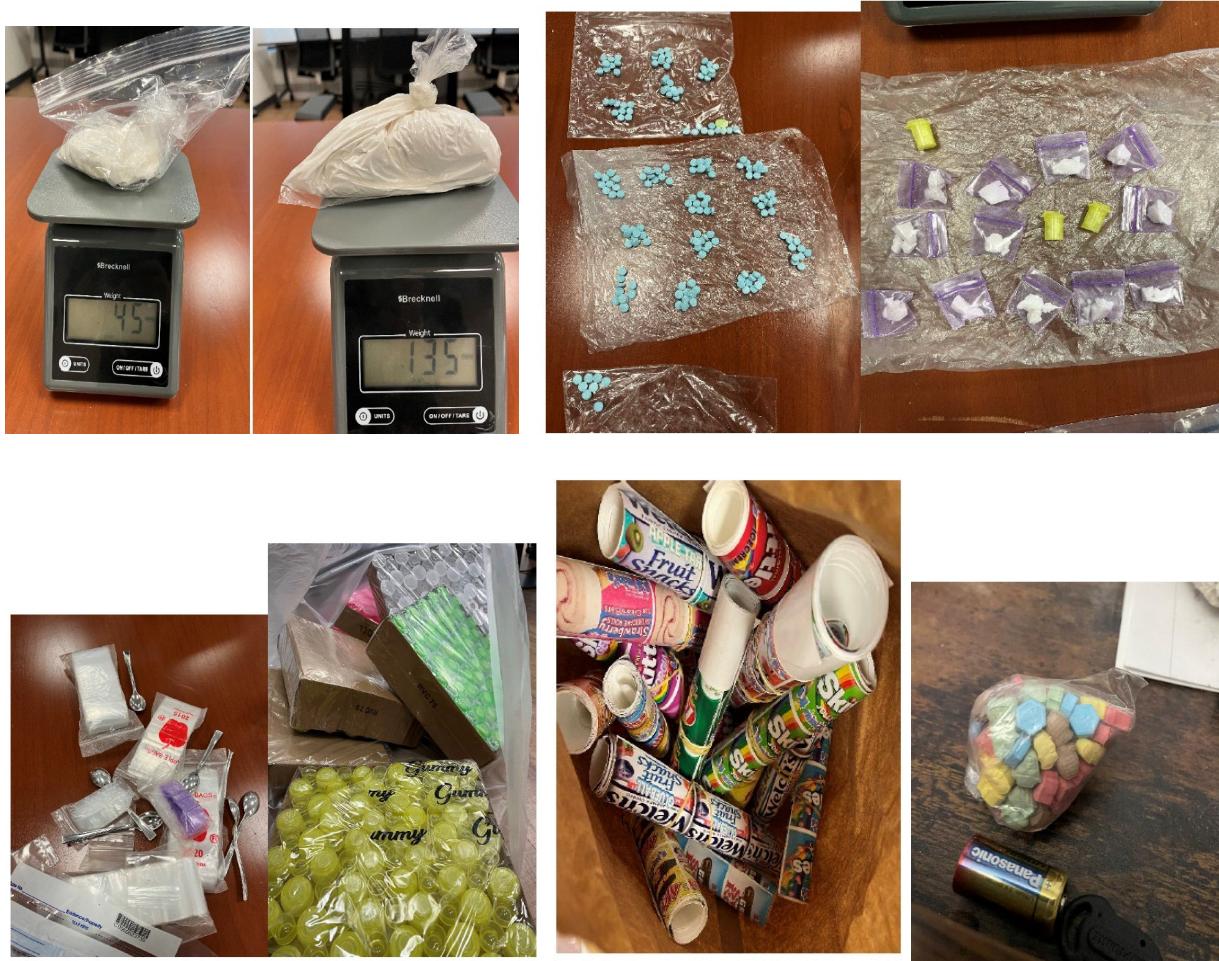
17. Additionally, Investigators reviewed pole camera footage for a camera in the area, which revealed that on or about October 30, 2024, Knowles was captured on video standing near the poster for “Beverly Hills Exotics” at the Gun Hill Road Property.

18. Based on the Knowles’ repeated presence at the Gun Hill Road Property, coupled with his Social Media Posts depicting Knowles with narcotics and firearms at the Defendant Property, Investigators concluded that the Defendant Property was being used as a stash house for the makeshift narcotics dispensary set up two blocks away at the Gun Hill Road Property.

19. On or about November 1, 2024, upon the Government’s application, a search and seizure warrant was sworn to before the Hon. Barbara C. Moses, United States Magistrate Judge for the Southern District of New York, with respect to the Defendant Property (the “Warrant”) based on probable cause to believe that the Defendant Property contained evidence of, among other things, narcotics conspiracy, receipt of firearms and ammunition while under felony indictment, and using and carrying firearms in furtherance of drug trafficking offenses. The Warrant Application and Search Warrant is incorporated by reference and attached hereto as Exhibit B.

20. On or about November 4, 2024, investigators executed Warrant and recovered the following from the Defendant Property: a pistol magazine; 177.73 grams of cocaine; 33 grams of methamphetamine; 38 grams of fentanyl; 65 grams of psilocybin

mushrooms; and 240 grams of marijuana.<sup>3</sup> Investigators also found drug packaging materials, which were designed to make the drugs look like candy (i.e., Welch's Fruit Snacks, Skittles, Peanut Buddy Bars, etc.) and approximately \$1700 in United States currency. Depicted below are some of the items seized from the Defendant Property:



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<sup>3</sup> All substances seized at the time of the search were subsequently tested by the New York City Police Laboratory, Controlled Substances Analysis Section on or about November 5, 2024, which confirmed the presence of these substances.



21. Upon the arrival of law enforcement at the Defendant Property to execute Warrant, several phones were found next to a space heater that was still on, making it appear that someone had departed quickly just prior to their entry.

22. Based on the foregoing, the Defendant Property is being used to facilitate the Drilly Gang narcotics operation.

**CLAIM FOR FORFEITURE**

23. The allegations contained in paragraphs 1 through 22 of this Verified Complaint are incorporated herein.

24. Title 18, United States Code, Section 985(c)(1)(A) provides that “The Government shall initiate a civil forfeiture action against real property by (A) filing a complaint for forfeiture.”

25. Title 21, United States Code, Section 881(a)(7) provides that:

“(a) Subject property. The following shall be subject to forfeiture to the United States and no property right shall exist in them: (7) All real property, including any right, title, and interest (including any leasehold interest) in the whole or any lot or tract of land and any appurtenances or improvement, which is used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, a violation of this subchapter punishable by more than one year’s imprisonment.”

26. Title 21, United States Code, Section 841(a)(1) provides in pertinent part that:

“(a) . . . it shall be unlawful for any person knowingly or intentionally – (1)to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance; . . .”

27. Cocaine, psilocybin mushrooms, and marijuana are Schedule I controlled substances, and fentanyl, oxycodone and methamphetamine are Schedule II controlled substances, pursuant to Title 21, United States Code, Section 812(b)(1).

28. As demonstrated by this Verified Complaint, there is probable cause to believe that the Defendant Property is subject to forfeiture pursuant to Title 21, United States Code, Section 881 because it constitutes property used, or intended to be used, in the sale of or facilitated the sale of a controlled substance, in violation of the provisions of Title 21, United States Code, Section 841.

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**CONCLUSION**

WHEREFORE, plaintiff United States of America prays that process issue to enforce the forfeiture of the Defendant Property and that all persons having an interest in the Defendant Property be cited to appear and show cause why the forfeiture should not be decreed, and that this Court decree forfeiture of the Defendant Property to the United States of America for disposition according to law, and that this Court grant plaintiff such further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Dated: New York, New York  
February 5, 2025

DANIELLE R. SASSOON  
United States Attorney for the  
Southern District of New York  
Attorney for the Plaintiff  
United States of America



By: \_\_\_\_\_  
ANDREW K. CHAN  
Assistant United States Attorney  
26 Federal Plaza  
New York, New York 10278  
Tel No. (212) 637-1072

**VERIFICATION**

STATE OF NEW YORK )  
COUNTY OF NEW YORK :  
SOUTHERN DISTRICT OF NEW YORK )

KYLIE WELSH, being duly sworn, deposes and says that she is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and as such has responsibility for the within action; that she has read the foregoing Verified Complaint and knows the contents thereof, and that the same is true to the best of her knowledge, information, and belief.

The sources of deponent's information and the ground of her belief are official records and files of the United States, information obtained directly by the deponent, and information obtained by other law enforcement officials and representatives during an investigation of alleged violations of Title 21, United States Code.

Dated: New York, New York  
February 4, 2025

  
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KYLIE WELSH  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives