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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term
Grand Jury Sworn in on June 14, 2024

UNITED STATES OF AMERICA	:	Case No 24-cr-_____
	:	
v.	:	GRAND JURY ORIGINAL
	:	
RASHAAD ROPER,	:	VIOLATIONS:
(Counts 1, 2)	:	
	:	COUNT 1:
DARIUS ROBERTSON,	:	18 U.S.C. § 371
(Counts 1, 3, 5)	:	(Conspiracy)
	:	
MARCEL VINES,	:	COUNTS 2, 4:
(Counts 1, 3, 5)	:	18 U.S.C. §§ 1791(a)(1), 2
	:	(Providing Contraband in a Prison and
STEFON FRESHLEY,	:	Aiding and Abetting)
(Counts 1, 5)	:	
	:	COUNTS 3, 5:
KIYA HOLLAND, and	:	18 U.S.C. §§ 1791(a)(2), 2
(Counts 1, 2, 4)	:	(Possessing Contraband in a Prison and
	:	Aiding and Abetting)
LATARA BROWN, and	:	
(Counts 1, 4),	:	
	:	<u>FILED UNDER SEAL</u>
Defendants.	:	
	:	

INDICTMENT

The Grand Jury charges that, at all times material to this Indictment, on or about the dates and at the approximate times stated below:

BACKGROUND

1. The District of Columbia Department of Corrections ("DOC") is a penal institution with an average daily population of approximately 1,700 inmates. It is located at 1901 D Street, in Southeast, Washington, D.C.

2. The Central Detention Facility ("CDF") is one of two DOC correctional facilities in Washington, D.C. that houses adult male detainees awaiting trial, serving a misdemeanor sentence, or in transit to a BOP facility. CDF also houses federal detainees awaiting trial in the United States District Court for the District of Columbia pursuant to a contract with the Bureau of Prisons ("BOP"). Northwest-1 ("NW-1") and Southwest-1 ("SW-1") are maximum-security housing units located in CDF.

3. Defendant RASHAAD ROPER ("ROPER") was a DOC employee and correctional officer between January 2021 and February 2024. He was assigned to the DOC CDF NW-1 housing unit from January 2024 to February 2024. As a correctional officer, ROPER's job duties included helping maintain order and security in the D.C. Jail.

4. Defendant DARIUS ROBERTSON ("ROBERTSON") was a DOC inmate beginning on December 17, 2021, and was incarcerated in NW-1 from February 1, 2024, to March 3, 2024 and July 12, 2024 to July 25, 2024. He was incarcerated in SW-1 from March 8, 2024 to July 12, 2024.

5. Defendant MARCEL VINES ("VINES") was a DOC inmate beginning on October 16, 2018, and was incarcerated in NW-1 from November 28, 2023, to March 3, 2024, and July 12, 2024 to July 25, 2024. He was incarcerated in SW-1 from March 12, 2024 to July 12, 2024.

6. Defendant STEFON FRESHLEY ("FRESHLEY") was a DOC inmate beginning on March 8, 2019 and was incarcerated in NW-1 from April 28, 2023 to March 3, 2024 and July 12, 2024 to July 25, 2024. He was incarcerated in SW-1 from March 3, 2024 to July 12, 2024.

7. Defendant KIYA HOLLAND ("HOLLAND") had a personal relationship with ROBERTSON. She communicated with ROBERTSON over recorded DOC jail calls using a phone number ending in X-4521.

8. Defendant LATARA BROWN ("BROWN") had a personal relationship with Inmate-1, a close associate of ROBERTSON, VINES, and FRESHLEY. She communicated with ROBERTSON over recorded DOC jail calls using a phone number ending in X-7363.

9. Co-Conspirator-1 was a DOC employee and correctional officer between August 2023 and July 2024. He was assigned to the DOC CDF SW-1 housing unit from March 3, 2024, to July 12, 2024, and NW-1 housing unit from July 12, 2024, to July 25, 2024. As a correctional officer, the job duties of Co-Conspirator-1 included helping maintain order and security in the D.C. Jail.

DOC Operations

10. DOC employees, including correctional officers, receive training on policies and practices that guide everyday operations. This includes training on the interdiction of prohibited objects, or contraband.

11. DOC trains all employees to prevent the possession and introduction of contraband into facilities and to detect it when present in the facilities. Introducing or trafficking contraband of any kind to inmates is strictly prohibited, as outlined in the October 21, 2022, DOC Contraband Control Policy. The objective of this policy is to maintain "[t]he security, safety and orderly operation of all DOC facilities," and entails levying "[a]ppropriate sanctions [] against any individual who possesses, attempts to introduce introduces or traffics contraband within DOC facilities." The policy defines knives, any illegal drug, tobacco products, and cellular telephones as major contraband.

12. Weapons, tobacco products, marijuana, illegal drugs, cellular telephones, cash, and items of value are considered prohibited objects as defined in 18 U.S.C. §§ 1791(d)(1)(B), (d)(1)(C), (d)(1)(F), and (d)(1)(G).

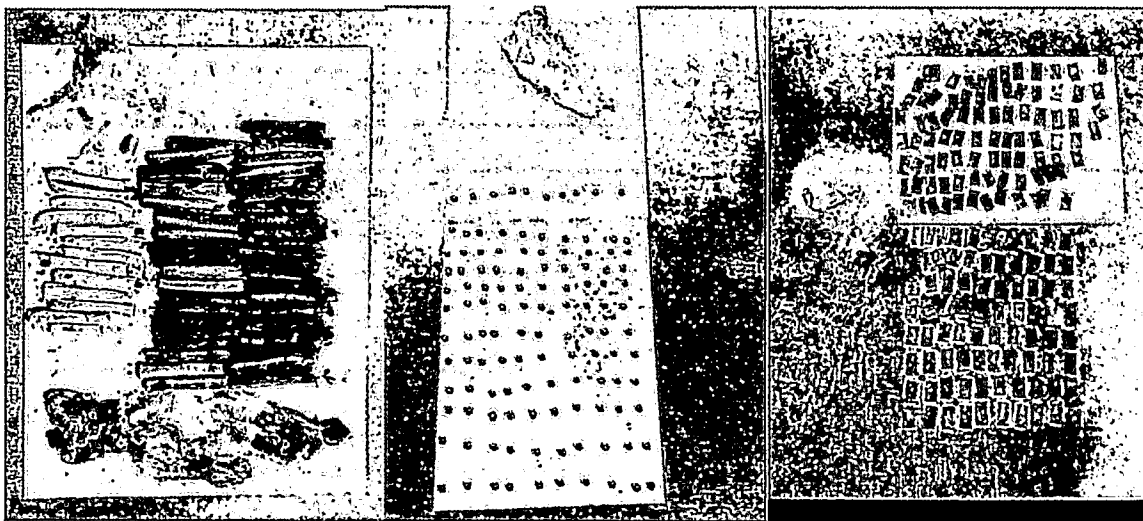
13. To deter the flow of contraband, employees must pass through an x-ray scanner and may be subject to a more thorough search when entering CDF. Personal items, including those contained in bags, must also pass through a x-ray scanner before being carried into the jail.

The Contraband Recovered

14. On February 28, 2024, DOC investigators intercepted a bag with two Tupperware containers HOLLAND delivered to the jail. Collectively, the Tupperware containers contained contraband as follows: 1) one switchblade knife; (2) one Apple iPhone cellphone; (3) a white USB iPhone charger; (4) two pairs of eyeglasses; (5) a bundle of marijuana wrapped in clear saranwrap; (6) tobacco wrapped in clear saranwrap; (7) several sheets of white rolling papers; (8) a pair of gambling dice; (9) three white sheets of bonded paper that were damp and emitted a chemical odor; (10) two saran-wrapped packages of marijuana; and (11) five individually wrapped packages in clear saranwrap containing approximately 100 cigarettes.



15. On July 25, 2024, DOC conducted a search of NW-1 for contraband. Inside NW-1, DOC staff found, among other things, approximately: (1) 269 blue pills (including 120 from VINES' cell), containing 5F-ADB—a synthetic cannabinoid and a Schedule I controlled substance; (2) 60 cigarettes soaked in an unknown liquid (including 40 in Vines' cell); (3) 255 strips containing Buprenorphine (170 in VINES' cell)—a Schedule III narcotic controlled substance; (4) 7 pieces of paper soaked in an unknown liquid substance; (5) three cellular phones; and (6) cigarettes.



COUNT ONE
(18 U.S.C. § 371)
(Conspiracy)

16. Paragraphs 1 through 15 of this Indictment are re-alleged.

The Conspiracy

17. From a date unknown but beginning by at least February 18, 2024, through at least July 25, 2024, in the District of Columbia and elsewhere, the defendants,

**RASHAAD ROPER,
DARIUS ROBERTSON,
MARCEL VINES,
STEFON FRESHLEY,
KIYA HOLLAND, and**

LATARA BROWN

did knowingly conspire, confederate, and agree, with one another and with Co-Conspirator-1 and other persons known and unknown to the Grand Jury to commit and attempt to commit and aid and abet other persons known and unknown to the Grand Jury to make, possess, and obtain a prohibited object—that is, a knife, Buprenorphine—a Schedule III narcotic controlled substance, cell phones, marijuana, tobacco, and 5F-ADB—a synthetic cannabinoid and a Schedule I controlled—in violation of 18 U.S.C. §§ 1791(a)(2), 2.

Purpose of the Conspiracy

18. The purpose of the conspiracy was for the conspirators and others to smuggle weapons, cell phones, narcotics, and other contraband into D.C. Jail, and to possess, use, and distribute the contraband therein.

Manner and Means

19. The conspirators carried out the conspiracy through the following manner and means, among others:

- a. Using jail issued phones and electronic tablets to plan and coordinate contraband smuggling;
- b. Packaging contraband in food containers and bags for better concealment;
- c. Using persons outside of CDF to facilitate contraband smuggling activities, *e.g.*, packaging and deliveries; and
- d. Introducing contraband into D.C. Jail through ROPER and Co-Conspirator-1, DOC correctional officers.

Acts in Furtherance of the Conspiracy

Smuggling Incident One

February 18, 2024

20. On February 18, 2024, at 3:06 pm, ROBERTSON made a recorded jail call to HOLLAND. The following conversation ensued:

ROBERTSON: You on your way?

HOLLAND: Yea, I'm about to leave out the house....too much...this is too much. Like this some greedy [expletives] right here.

ROBERTSON: I mean but it's two bowls though baby.

HOLLAND: It don't matter it's just that [Individual-1's] joint is like big as [expletive], like c'mon now what the [expletive].

ROBERTSON: I know baby.

HOLLAND: I's some greedy [expletive].

ROBERTSON: Yea...as long as it get through though baby.

ROBERTSON: You still remember them people don't you?

HOLLAND: What?

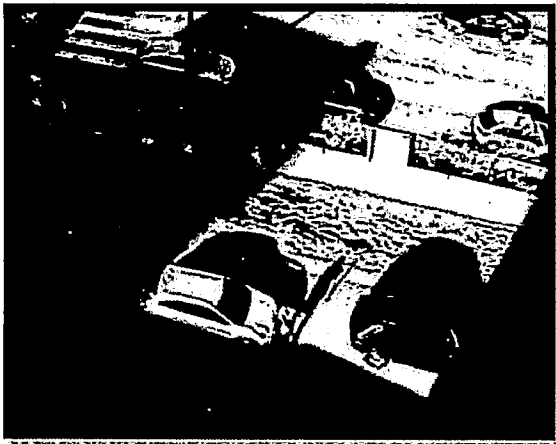
ROBERTSON: I said you still remember them people don't you?

HOLLAND: No.

ROBERTSON: Roper.

HOLLAND: Aight.

21. Less than a half-hour later, HOLLAND parked her silver hatchback car in a DOC parking lot. HOLLAND exited the driver's side of the car. She then proceeded to the staff entrance area of the D.C. Jail. In her hand was a white bag containing objects prohibited in the jail. Once inside, HOLLAND left the bag next to a door that leads to a screening room with magnetometers.



22. After delivering the package, HOLLAND exited the D.C. Jail, entered the driver's seat of the silver car, and drove away.

23. At 4:36 pm, after the end of his shift, ROPER walked into the jail staff entrance area. He immediately looked in the direction of the white bag left by HOLLAND. ROPER took possession of the white bag and entered the DOC screening room.

24. Once inside, ROPER walked around the x-ray machine for screening containers and bags. After being stopped by a correctional officer who was working in the screening room, ROPER submitted the white bag through the x-ray machine; however, no correctional officer at the time was monitoring the machine as the bag passed through. ROPER then recovered the bag and removed two Tupperware containers with orange lids from inside. He placed the containers into a different plastic bag. ROPER took the bag and exited the screening room by walking around the magnetometer that all persons must pass through.

25. At 4:40 pm, ROPER walked into the employee locker room and placed the bag in a locker and left the jail for the day.

February 19, 2024

26. On February 19, 2024, at around 2:30 pm, ROPER walked into the D.C. Jail kitchen and obtained an empty white disposable food container.

27. At 2:33 pm, ROPER walked the food container into the DOC locker room. Inside the locker room, ROPER removed the two Tupperware containers with orange lids from his locker and transferred the contraband from one of those two Tupperware containers into the white food container. ROPER then exited the locker room with the white food container and a Tupperware container with an orange lid.

28. At 2:39 pm, ROPER entered an empty hallway in NW-1. At the time, a pushcart with two large yellow and red coolers on it was inside the hallway. ROPER placed the food container on top of the pushcart as he walked past it.



29. At 2:42 pm, ROBERTSON, VINES, FRESHLEY, and a DOC staff member walked into the hallway that ROPER had exited minutes earlier. Upon entering, VINES grabbed the food container from the pushcart as the inmates and DOC staff member conversed.

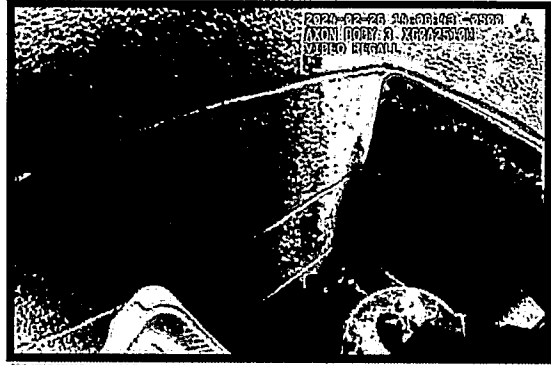


30. At 2:43 pm, VINES took the food container with him into his jail cell. ROBERTSON and FRESHLEY followed VINES into his jail cell.

February 26, 2024

31. On February 26, 2024, ROPER returned to work in NW-1 for the first time since February 19, 2024. At 1:52 pm, ROPER retrieved a white disposable food container from inside of a security post area in NW-1.

32. At 2:00 pm, ROPER entered the locker room with the food container. He retrieved a clear plastic bag from an unlocked locker then removed from the bag one Tupperware container affixed with an orange lid. ROPER took the lid off to reveal a salad. Wearing blue latex gloves, ROPER dug into the salad and removed four to five saran-wrapped objects, placed the items inside of the disposable food container, and shut the tray lid. He exited the locker room holding the disposable food container and the Tupperware.



33. At 2:11 p.m., ROPER met with VINES inside of a room near the NW-1 correctional officer security post. ROPER placed the disposable food container that was in his hand on top of a shelf. VINES soon took possession of the food container.

34. About one minute later, VINES walked into his assigned cell with the food container in his hand. Within seconds, ROBERTSON entered VINES' cell. ROBERTSON stayed with VINES for a few minutes, exited the cell, then met with ROPER, who escorted ROBERTSON to a visiting room. Waiting inside the room were two inmates from the Northwest-3 housing unit of CDF. None of the inmates had any permissible reason to be in the visiting room. The three inmates remained together inside of the visiting room for approximately 45 minutes. Thereafter, ROBERTSON walked with the other inmates to the doors of NW-3 before returning to NW-1.

Smuggling Incident Two

February 28, 2024

35. On February 28, 2024, at 10:56 am, HOLLAND parked a silver hatchback car in the DOC parking lot and entered the jail carrying a white plastic bag, which contained prohibited items as described in paragraph 14. HOLLAND dropped off the white bag in the same area as she did on February 18—in the staff entry area near the door to the screening room entrance—before exiting and driving away in the silver car.

36. At 1:00 pm, DOC Office of Investigative Services investigators monitoring surveillance video took custody of the white bag delivered by HOLLAND and within it found the contraband.

37. At 1:12 pm, ROPER entered the staff entrance area. After searching the area where HOLLAND had left the white bag that morning, ROPER returned to the NW-1 housing unit for duty, empty-handed.

38. At 1:34 pm, ROBERTSON was released from his jail cell. Shortly thereafter, ROPER and ROBERTSON engaged in a conversation about how ROPER was unable to locate the white bag containing contraband.

39. At 1:40 pm, ROBERTSON placed a recorded jail call to HOLLAND. ROBERTSON confirmed to HOLLAND that she dropped off the contraband. ROBERTSON told HOLLAND that ROPER was unable to locate the bag.

40. At 3:19 pm, ROPER again entered the staff entrance area. Upon entering, he looked to his left in the direction of the table where HOLLAND had left the confiscated bag. ROPER then approached the table and reviewed the contents of other bags in the area. He left shortly after, empty-handed, and resumed his shift duties in NW-1.

41. At 3:45 pm, ROPER spoke to VINES and FRESHLEY.

42. On February 29, 2024, DOC placed Roper on administrative leave.

Smuggling Incident 3

June 30, 2024

43. On the morning of June 30, 2024, BROWN had multiple calls with Inmate-1, her significant other and a close associate of ROBERTSON, VINES, and FRESHLEY. The two discussed the packaging of contraband to avoid detection.

44. On June 30, 2024, at 12:23 p.m., ROBERTSON made a recorded jail call to HOLLAND and asked HOLLAND to initiate a three-way call with BROWN. The following conversation took place:

ROBERTSON: Listen, Tara...what, you about to leave?

BROWN: Yep.

ROBERTSON: Cause, nah, I was about to have my man come outside real quick to, uh -

BROWN: Alright.

ROBERTSON: What kind of car you in, though?

BROWN: Gray Honda.

ROBERTSON: A gray Honda?

BROWN: Yep.

ROBERTSON: Alright, he gonna be a big [slur] with a bald head, Slim. You hear me?
Please, for me. I got you, Slim.

BROWN: Alright.

ROBERTSON: Alright. Thank you. I got you.

45. Approximately ten minutes after the call between BROWN and ROBERTSON, at 12:38 p.m., Co-Conspirator-1, who is bald, exited the D.C. Jail and walked directly to a gray Honda stopped at the intersection of 20th and D Street, Southeast.

46. At 12:39 p.m., BROWN handed Co-Conspirator-1 a blue bag containing a rectangular Tupperware container with a blue top.

47. At 12:40 p.m., Co-Conspirator-1 walked into the staff entrance of the D.C. Jail with the blue bag. At 12:43 p.m., Co-Conspirator-1 removed the Tupperware container with the blue

top from the blue bag and sent it through the x-ray machine for screening. Co-Conspirator-1 then entered CDF with the Tupperware container with the blue top.

48. At approximately 12:52 p.m., Co-Conspirator-1 entered the SW-1 unit with the Tupperware container with the blue top. At 2:48 p.m. Co-Conspirator-1 handed the Tupperware container with the blue top to FRESHLEY. At 2:48 p.m., FRESHLEY entered his assigned cell.

Smuggling Incident 4

July 7, 2024

49. On July 7, 2024, at 11:33 a.m., Co-Conspirator-1 and FRESHLEY had a conversation in SW-1. Immediately following that conversation, Co-Conspirator-1 exited SW-1.

50. At 11:36 a.m., Co-Conspirator-1 exited CDF and walked to his vehicle in the DOC staff parking area.

51. At approximately 11:48 a.m., ROBERTSON made a recorded jail call to HOLLAND. The following conversation took place:

ROBERTSON: You gonna give her everything?

HOLLAND: Yeah. That's - why I was meeting her, right?

ROBERTSON: Ah, yeah, yeah. Just give her everything. I guess, baby. Just go ahead and give her everything and she'll just bring it. I mean, what the [expletive].

HOLLAND: Cause she said she got [expletive], too!

ROBERTSON: Yeah.

52. Shortly after that call, HOLLAND met with BROWN at a BP gas station on Pennsylvania Avenue, Southeast, and provided BROWN with items to be smuggled into the D.C. Jail.

53. At approximately 12:00 p.m., BROWN and ROBERTSON had the following conversation over a recorded jail call:

ROBERTSON: Yeah, at the uh, at the round – he said, he said, come in the circle and, uh, down there by the construction site. He got a broken glass, his, his window got a, his car window got a trash bag on it.

BROWN: Alright, I'm - alright. Okay.

ROBERTSON (Laughs). That's good enough? You know where the construction site at though, don't ya?

BROWN: Where?

ROBERTSON: In the parking lot. It's in the parking lot around the circle. Yeah, and his jaunt got – right, and his jaunt got a broken window with a bag on it.

ROBERTSON: Alright, okay. Okay.

54. At 12:02 p.m., a gray Honda sedan drove in front of CDF and stopped in the staff parking area near Co-Conspirator-1's vehicle.

55. At 12:04 p.m., Co-Conspirator-1 approached the gray 4-door sedan and received a green bag from BROWN. Upon receiving the bag, Co-Conspirator-1 walked back towards CDF and the gray vehicle exited the staff parking area.

56. At 12:06 p.m., Co-Conspirator-1 entered the CDF staff entrance carrying a green bag.

57. At 12:07 p.m., Co-Conspirator-1 approached the security screening area and removed two Tupperware containers—one with a red top and one with a green top—from the green bag and placed them in a gray bin to pass through the x-ray machine.

58. At 12:14 p.m., Co-Conspirator-1 exited the security screening area and walked into CDF with both Tupperware containers.

59. At 12:16 p.m., Co-Conspirator-1 entered SW-1 with both containers and walked into the control module—the locked room in the unit where the corrections officers monitor inmates and have the ability to lock and unlock doors and cells.

60. At 1:03 p.m., Co-Conspirator-1 handed the Tupperware container to FRESHLEY through the control module door.

61. At 1:04 p.m., FRESHLEY entered his cell with both containers followed by VINES.

Smuggling Incident 5

July 21, 2024

62. On July 19, 2024, FRESHLEY had several recorded jail calls with a number ending in -4646 about going to a store to get two phones reset and unlocked. Once that is completed, the user of the number ending -4646 was told by FRESHLEY to contact another woman.

63. On July 21, 2024, at 10:21 a.m., ROBERTSON placed a recorded jail call to HOLLAND and discussed the smuggling of two cellular phones into the jail in a Popeye's Chicken bag.

64. At 11:55 a.m., Co-Conspirator-1 described to ROBERTSON the exact location of his car in the jail parking lot.

65. At approximately 11:57 a.m., HOLLAND drove her silver hatchback into the jail parking lot. HOLLAND circled the parking lot looking for Co-Conspirator-1's vehicle.

66. At 12:00 p.m., Co-Conspirator-1 wrote his license plate number on a piece of paper. Co-Conspirator-1 showed the piece of paper to FRESHLEY and said, "tell her that's my license plate number."

67. At 12:00 p.m., HOLLAND parked her silver hatchback next to Co-Conspirator-1's vehicle. HOLLAND exited her car and placed a Popeye's bag with a Tupperware container into Co-Conspirator-1's vehicle before returning to her car and driving away.

68. At 12:23 p.m., Co-Conspirator-1 had a conversation with ROBERTSON and VINES about when they wanted Co-Conspirator-1 to take his lunch break and retrieve the Tupperware container. Co-Conspirator-1 informed ROBERTSON and VINES that FRESHLEY instructed him to put the container in the room where the inmates have access to electronic tablets.

69. At 12:49 p.m., Co-Conspirator-1 exited CDF and walked to his vehicle in the staff parking lot. At 1:29 p.m., Co-Conspirator-1 returned from his lunch with the Popeye's bag. Co-Conspirator-1 walked to the security area and placed the bag in the in the x-ray scanner. Co-Conspirator-1 then removed a Tupperware container with an orange top from the bag and placed the container into a clear plastic bag. He then walked with the Tupperware container from the security area to NW-1.

70. As soon as Co-Conspirator-1 entered NW-1, at approximately 1:38 p.m., VINES was waiting outside the tablet room. Co-Conspirator-1 noted how heavy the Tupperware container was and handed it to VINES.

71. Co-Conspirator-1 then obtained the key to the tablet room and went inside with VINES. Co-Conspirator-1 noted to VINES that FRESHLEY "normally puts it in his bag." Co-Conspirator-1 then set down the container and instructed VINES to tell FRESHLEY where Co-Conspirator-1 put it.

72. At approximately 1:42 p.m., Co-Conspirator-1 escorted FRESHLEY to the tablet room where he left the Tupperware container. FRESHLEY carried his laundry bag. As the two walked together, Co-Conspirator-1 described the exact location of the container inside the room.

73. Inside the room, Co-Conspirator-1 warned FRESHLEY that the container is heavy, and FRESHLEY loaded the container into the laundry bag. FRESHLEY exited the tablet room and walked back towards his cell with the orange bag.

74. At 1:43 p.m., FRESHLEY brought the bag with the container inside his cell.

(In violation of Title 18, United States Code, Section 371)

COUNT TWO

(18 U.S.C. §§ 1791(a)(1), 2)

(Providing or Possessing Contraband in a Prison and Aiding and Abetting)

75. Paragraphs 1 through 15 and 17 through 42 of this Indictment are re-alleged.

76. Between February 18, 2024, and through February 29, 2024, within the District of Columbia, the defendants,

**RASHAAD ROPER and
KIYA HOLLAND,**

provided and attempted to provide an inmate of a prison a prohibited object, that is, a knife, a cell phone, marijuana, and tobacco, and aided and abetted other persons known and unknown to the Grand Jury in so doing.

(In violation of Title 18, United States Code, Sections 1791(a)(1), 2)

COUNT THREE

(18 U.S.C. §§ 1791(a)(2), 2)

(Providing or Possessing Contraband in a Prison and Aiding and Abetting)

77. Paragraphs 1 through 15 and 17 through 42 of this Indictment are re-alleged.

78. Between February 18, 2024, and through February 29, 2024, within the District of Columbia, the defendants,

**DARIUS ROBERTSON and
MARCEL VINES**

being an inmate of a prison, made, possessed, and obtained a prohibited object, that is, a knife, a cell phone, marijuana, and tobacco, and attempted to do so, and aided and abetted other persons known and unknown to the Grand Jury in so doing.

(In violation of Title 18, United States Code, Sections 1791(a)(2), 2)

COUNT FOUR

(18 U.S.C. §§ 1791(a)(1), 2)

(Providing or Possessing Contraband in a Prison and Aiding and Abetting)

79. Paragraphs 1 through 15, 17 through 19 and 43 through 74 of this Indictment are re-alleged.

80. Between June 30, 2024, and through July 21, 2024, within the District of Columbia, the defendants,

**KIYA HOLLAND and
LATARA BROWN**

provided and attempted to provide an inmate of a prison a prohibited object, that is, two cellular phones, Buprenorphine—a Schedule III Narcotic controlled substance, and 5F-ADB—a synthetic cannabinoid and a Schedule I controlled substance, and attempted to do so, and aided and abetted other persons known and unknown to the Grand Jury in so doing.

(In violation of Title 18, United States Code, Sections 1791(a)(1), 2)

COUNT FIVE
(18 U.S.C. §§ 1791(a)(2), 2)
(Providing or Possessing Contraband in a Prison and Aiding and Abetting)

81. Paragraphs 1 through 15, 17 through 19, and 43 through 74 of this Indictment are re-alleged.

82. Between June 30, 2024, and through July 21, 2024, within the District of Columbia, the defendants,

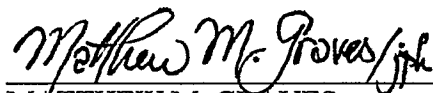
**DARIUS ROBERTSON,
MARCEL VINES, and
STEFON FRESHLEY**

being an inmate of a prison, made, possessed, and obtained a prohibited object, that is, two cellular phones, Buprenorphine—a Schedule III Narcotic controlled substance, and 5F-ADB—a synthetic cannabinoid and a Schedule I controlled substance, and aided and abetted other persons known and unknown to the Grand Jury in so doing.

(In violation of Title 18, United States Code, Sections 1791(a)(2), 2)

A TRUE BILL

FOREPERSON



MATTHEW M. GRAVES
ATTORNEY FOR THE UNITED STATES
IN AND FOR THE DISTRICT OF COLUMBIA