

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on September 15, 2022

UNITED STATES OF AMERICA

v.

EUGENE TRACY HILL,
also known as "Geno,"
also known as "Cheese,"
(Counts 1, 3, 4, 7, 8, 9, 10, 11, 12, 16, 17)

DIANTE ARIK WILEY,
also known as "Sleez,"
also known as "Taybino,"
(Counts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 13, 14, 15)

BROADUS JAMAL DANIELS,
also known as "Wardy,"
(Counts 1, 3, 5, 6)

ANDRE ALONTE WILLIS,
also known as "Boogie,"
(Counts 1, 3, 7, 8)

Defendants.

CRIMINAL NO. 22-CR-303 (ABJ)

VIOLATIONS:

21 U.S.C. § 846
(Conspiracy to Distribute Marijuana and
Oxycodone)
18 U.S.C. § 922(a)(1)(A)
(Engaging in the Business of Dealing in
Firearms Without a License)
18 U.S.C. § 924(o)
(Conspiracy to Use, Carry, and Possess
Firearms, Including Semi-Automatic Assault
Rifles and Machineguns, During, in Relation
to, and in Furtherance of Drug Trafficking)
21 U.S.C. § 922(o)
(Illegal Possession and Transfer of a
Machinegun)
18 U.S.C. § 924(c)(1)(B)(ii)
(Using, Carrying, and Possessing a
Machinegun During, in Relation to, and in
Furtherance of, a Drug Trafficking Offense)
21 U.S.C. §§ 841(a)(1), (b)(1)(D)
(Possession with Intent to Distribute
Marijuana)
18 U.S.C. § 924(c)(1)(A)(i)
(Using, Carrying, and Possessing a Firearm
During, in Relation to, and in Furtherance of, a
Drug Trafficking Offense)
18 U.S.C. § 2 (Aiding and Abetting)

FORFEITURE: 18 U.S.C. § 924(d),
21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Beginning on or about August 1, 2018, and continuing through on or about March 14, 2023, within the District of Columbia and elsewhere, **EUGENE TRACY HILL**, also known as “Geno,” also known as “Cheese,” **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” **BROADUS JAMAL DANIELS**, also known as “Wardy,” **ANDRE ALONTE WILLIS**, also known as “Boogie,” and others both known and unknown to the Grand Jury did knowingly and willfully combine, conspire, confederate, and agree together, and with other persons, to unlawfully, knowingly, and intentionally distribute and possess with intent to distribute a mixture and substance containing 100 kilograms or more of Marijuana, a Schedule I controlled substance, and a detectable amount of Oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(vii), 841(b)(1)(C), 841(b)(1)(D), and 846.

Conduct Reasonably Foreseeable to Each Defendant

With respect to **EUGENE TRACY HILL**, also known as “Geno,” also known as “Cheese,” and **ANDRE ALONTE WILLIS**, also known as “Boogie,” each of their conduct as a member of the conspiracy to distribute controlled substances as charged in Count One of this Indictment, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count One, included 100 kilograms or more of Marijuana, a Schedule I controlled substance, and a detectable amount of Oxycodone, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vii), 841(b)(1)(C), and 846.

With respect to **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” and **BROADUS JAMAL DANIELS**, also known as “Wardy,” each of their conduct as a member of the conspiracy to distribute controlled substances as charged in Count One of this

Indictment, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count One, included a detectable amount of Marijuana, a Schedule I controlled substance, and a detectable amount of Oxycodone, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 841(b)(1)(D), and 846.

(Conspiracy to Distribute Marijuana and Oxycodone, in violation of Title 21, United States Code, Section 846)

COUNT TWO

Beginning on or about August 1, 2018, and continuing through on or about April 9, 2021, within the District of Columbia and elsewhere, **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” not being 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, Sections 922(a)(1)(A)).

COUNT THREE

Beginning on or about August 1, 2018, and continuing through on or about April 9, 2021, within the District of Columbia and elsewhere, **EUGENE TRACY HILL**, also known as “Geno,” also known as “Cheese,” **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” **BROADUS JAMAL DANIELS**, also known as “Wardy,” **ANDRE ALONTE WILLIS**, also known as “Boogie,” and others both known and unknown to the Grand Jury did knowingly combine, conspire, confederate, and agree with each other to commit offenses against the United States, namely: to knowingly use, carry, and possess firearms, including semi-automatic assault rifles and machineguns, in furtherance of drug trafficking offenses for which they may be prosecuted in a court of the United States, that is, Unlawful Distribution and Possession with Intent

to Distribute Controlled Substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), 841(b)(1)(D), and 846, as charged in Count One of this Indictment.

Goal of the Conspiracy

The goal of the conspiracy was to obtain, possess, and sell firearms, including handguns, semi-automatic assault rifles, and machineguns, in the District of Columbia and elsewhere, for the purposes of furthering the illegal conspiracy to distribute, and possess with intent to distribute, controlled substances, as charged in Count One of this Indictment.

The Manner and Means Used to Achieve the Objectives of the Conspiracy

The manner and means by which this conspiracy was carried out included the following:

1. The co-conspirators would use, carry, and possess firearms in furtherance of drug trafficking offenses. Specifically, the co-conspirators would use, carry, and possess such firearms to protect themselves, their cash, their drugs, and their drug trafficking territory.
2. **DIANTE ARIK WILEY** would build or assemble both semi-automatic and fully automatic AR-Pistols from “kits” that he purchased through online retailers.
3. Once the AR-Pistols were built and assembled, **DIANTE ARIK WILEY** would sell them to the co-conspirators, and others, both known and unknown to the Grand Jury. At certain times during the conspiracy, **DIANTE ARIK WILEY** delivered the AR-Pistols directly to **EUGENE TRACY HILL**, who redistributed the AR-Pistols. At other times **DIANTE ARIK WILEY** sold the AR-Pistols, or offered them for sale, by advertising them for sale on his social media accounts.
4. In addition to AR-Pistols built or assembled by **DIANTE ARIK WILEY**, the co-conspirators would purchase or otherwise acquire, or attempt to purchase or acquire, firearms from each other, or from other sources, both known and unknown to the grand jury, in order to ensure

that they always had firearms on hand. The co-conspirators would use the firearms to protect their drug trafficking business and further their enterprise against other traffickers.

5. The co-conspirators maintained “trap houses” within their drug trafficking territory and used those “trap houses” to store both drugs and firearms, including both semi-automatic and fully automatic AR-Pistols built and assembled by **DIANTE ARIK WILEY**. The co-conspirators stored firearms in “trap houses” in order to ensure that there were always firearms on hand whenever a co-conspirator needed one to protect themselves, their money, their drugs, or their drug trafficking territory

6. The co-conspirators would sell, attempt to sell, or otherwise dispose of certain firearms in order to acquire money to purchase drugs and/or other firearms.

7. In order to carry out the conspiracy, the co-conspirators would exchange electronic messages with each other, and with unindicted co-conspirators, both known and unknown to the grand jury, via cellular telephone or social media, to discuss the purchase, sale, or trade of firearms. During these same electronic messages, the co-conspirators would also discuss their distribution of controlled substances.

8. In order to carry out the conspiracy, the co-conspirators would communicate in coded language, or slang, in an attempt to conceal their illicit activities.

Conduct Reasonably Foreseeable to Each Defendant

With respect to **EUGENE TRACY HILL**, also known as “Geno,” also known as “Cheese,” **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” **BROADUS JAMAL DANIELS**, also known as “Wardy,” and **ANDRE ALONTE WILLIS**, also known as “Boogie,” each of their conduct as a member of the conspiracy to possess firearms in furtherance of a drug trafficking crime, as charged in Count Three of this Indictment, which

includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count Three, included at least one “machinegun” as that term is defined in 26 U.S.C. § 5845(b).

Overt Acts in Furtherance of the Conspiracy

In furtherance of the conspiracy, and in order to effect the objects thereof, the co-conspirators and others, both known and unknown to the Grand Jury, committed, or caused to be committed, the following overt acts in the District of Columbia and elsewhere.

1. On or about September 24, 2018, **EUGENE TRACY HILL** sold four AR-Pistols that were assembled by **DIANTE ARIK WILEY** to **CO-CONSPIRATOR ONE**, knowing that **CO-CONSPIRATOR ONE** distributed controlled substances.

2. On or about August 7, 2019, **DIANTE ARIK WILEY** exchanged Instagram direct messages with **BROADUS JAMAL DANIELS** about an AR-Pistol machinegun. During that direct message exchange, **DANIELS** offered to give **WILEY** a Glock, model 22, .40 caliber semi-automatic handgun and \$300 in exchange for an AR-Pistol machinegun.

3. On or about August 8, 2019, **DIANTE ARIK WILEY** and **BROADUS JAMAL DANIELS** exchanged additional Instagram direct messages about the AR-Pistol machinegun they discussed on August 7, 2019. During this exchange, **WILEY** asked **DANIELS** if **DANIELS** had any questions about the AR-Pistol machinegun he’d sold him while he was still available, stating “You str8. Before I leave this WiFi.” **DANIELS** responded, “Yea I’m Str8 You Rolled This Joint,” indicating that he was satisfied given **WILEY**’s test-fire of the AR-Pistol machinegun. **DANIELS** then told **WILEY** to bring him ammunition, stating “Bring Them Shells For Me.”

4. On or about August 8, 2019, **BROADUS JAMAL DANIELS** and **EUGENE TRACY HILL** exchanged Instagram direct messages about ammunition for an AR-Pistol. During that exchange, **DANIELS** asked **HILL**, “You Got Sum Shells For Tha Arp.” In response, **HILL**

responded “Naww Boogie might,” indicating that **HILL** did not have any ammunition for an AR-Pistol, but that **ANDRE ALONTE WILLIS** might have some. **DANIELS** then asked **HILL** for **WILLIS**’ telephone number, which **HILL** provided to **BROADUS**.

5. On or about August 8, 2019, **DIANTE ARIK WILEY** sent an Instagram direct message to **CO-CONSPIRATOR THREE** advertising an AR-Pistol machinegun for sale, stating “I got a fully.” **CO-CONSPIRATOR THREE** informed **WILEY** that he was interested in acquiring the AR-Pistol machinegun, but wanted **WILEY** to “let him owe” – in other words, to give **CO-CONSPIRATOR THREE** the AR-Pistol machinegun immediately but pay for it at a later time.

6. On or about August 17, 2019, **DIANTE ARIK WILEY** and **CO-CONSPIRATOR THREE** exchanged Instagram direct messages about an AR-Pistol machinegun that **WILEY** had advertised for sale. During that exchange, **CO-CONSPIRATOR THREE** asked to **WILEY** to give him the AR-Pistol machinegun immediately, on the condition that **CO-CONSPIRATOR THREE** would pay him \$875 for the AR-Pistol at a later time, stating “Lemme get that I owe my money good, I need that. Ima have 875\$ for u.” **WILEY** responded by stating “U got 875 now,” indicating **WILEY**’s belief that **CO-CONSPIRATOR THREE** had enough money to pay up front for the AR-Pistol.

7. On or about September 3, 2019, **DIANTE ARIK WILEY** sent an Instagram direct message to **CO-CONSPIRATOR THREE** stating “Fully arp” indicating that **WILEY** had an AR-Pistol machinegun for sale. **CO-CONSPIRATOR THREE** responded by asking **WILEY** “How much”?

8. On or about December 18, 2019, **DIANTE ARIK WILEY** sent an Instagram direct message to **BROADUS JAMAL DANIELS** regarding the price that **WILEY** was charging for

AR-Pistol machineguns. During that direct message exchange, **WILEY** stated that he would sell **DANIELS** an AR-Pistol machinegun chambered for 5.56mm/.223 caliber ammunition for \$900.

9. On or about March 19, 2020, **BROADUS JAMAL DANIELS** and **DIANTE ARIK WILEY** exchanged Instagram direct messages regarding the availability of AR-Pistol machineguns for purchase. During that direct message exchange, **DANIELS** asked **WILEY** “Wassup with them Arps.” **DANIELS** also indicated that he was ready to buy whenever **WILEY** was ready to sell, stating “Weneva You Ready.” **DANIELS** then told **WILEY**, “556” indicating that **DANIELS** wanted **WILEY** to assemble an AR-Pistol machinegun chambered for 5.56mm/.223 caliber ammunition.

10. On March 25, 2020, **BROADUS JAMAL DANIELS** and **DIANTE ARIK WILEY** exchanged Instagram direct messages about AR-Pistol machineguns. During that exchange, **DANIELS** asked **WILEY** about the status of the AR-Pistol machinegun they discussed on March 19, 2020, stating “Wats the word”? In response, **WILEY** stated that he was taking a break from building AR-Pistols so that he didn’t get caught by law enforcement, stating “Shit hot I’m not fucking round wit them joints no more.”

11. On or about April 15, 2020, **DIANTE ARIK WILEY** advertised six AR-Pistol machineguns for sale on his Instagram page, three of which were larger than the other three.

12. On or about April 15, 2020, **EUGENE TRACY HILL** sent an Instagram direct message to **DIANTE ARIK WILEY** inquiring about the three smaller AR-Pistol machineguns that had been advertised for sale by **WILEY**, stating “Bruh wats the short joints”? In response, **WILEY** stated “9s” indicating that the AR-Pistol machineguns were chambered for 9mm ammunition.

13. On or about April 15, 2020, **CO-CONSPIRATOR FOUR** and **DIANTE ARIK WILEY** exchanged Instagram direct messages regarding the availability of AR-Pistol machineguns for purchase. During that direct message exchange, **CO-CONSPIRATOR FOUR** asked **WILEY** whether there were any AR-Pistols available for sale, and **WILEY** stated “only got 1 left need 900 tho everybody is asking me rn got the whole gang on my line,” indicating that he had an AR-Pistol machinegun for sale for \$900 for it, and further indicating that he was having trouble keeping up with demand because everyone in the “gang” was interested in purchasing AR-Pistol machineguns. **CO-CONSPIRATOR FOUR** then offered to buy the AR-Pistol machinegun, stating that the younger members of his crew would be “dying work with that.” In response, **WILEY** told **CO-CONSPIRATOR FOUR**, “I’m boutta put 2 inna hood ... y’all put 700 together I’ll drop one off in a couple days,” indicating that **WILEY** was already planning to deliver two AR-Pistol machineguns for use in defending the drug dealing territory, but that he would deliver an additional AR-Pistol machinegun to **CO-CONSPIRATOR FOUR** if he paid \$700 for it.

14. On or about April 15, 2020, **CO-CONSPIRATOR FIVE** sent an Instagram direct message to **DIANTE WILEY** stating “Wya we trying get that mini joint,” indicating that **CO-CONSPIRATOR FIVE** and someone else were interested in buying one of the three smaller AR-Pistols that **WILEY** had advertised for sale. In response, **WILEY** stated “I got y’all they coming soon these dawg man joints,” indicating that those AR-Pistols had already been purchased by someone else but that **WILEY** would be building AR-Pistols for **CO-CONSPIRATOR FIVE** soon.

15. On or about April 15, 2020, **CO-CONSPIRATOR THREE** sent an Instagram direct message to **DIANTE ARIK WILEY** stating “!! Wassup w da pistols ona right” indicating that **CO-CONSPIRATOR THREE** wanted to learn more about the three smaller AR-Pistols

machineguns that **WILEY** had advertised for sale. In response, **WILEY** stated “They arp they just 9mm,” indicating that the smaller AR-Pistol machineguns were identical to the others, except that they were chambered for smaller ammunition. **CO-CONSPIRATOR THREE** then offered to pay \$500 for one of the 9mm AR-Pistol machineguns immediately, and **WILEY** told **CO-CONSPIRATOR THREE** to contact **CO-CONSPIRATOR FOUR**.

16. On or about April 27, 2020, **BROADUS DANIELS** sent an Instagram direct message to **DIANTE ARIK WILEY** offering to purchase one of the “mini” AR-Pistol machineguns advertised by **WILEY** on April 15, 2020, for \$800. **WILEY** responded, stating that he would sell **DANIELS** an AR-Pistol Machinegun chambered for .223 caliber for \$800, but that he was charging “\$1000 for the minis” because “they cost more to get”.

17. On or about June 7, 2020, **DIANTE ARIK WILEY** sold an AR-Pistol machinegun to **EUGENE TRACY HILL** and **ANDRE ALONTE WILLIS**.

18. Beginning on June 23, 2020, and continuing through June 24, 2020, **DIANTE ARIK WILEY** and **EUGENE TRACY HILL** exchanged Instagram direct messages about the payment that **WILEY** expected to receive for the AR-Pistol machinegun sold on June 7, 2020, as well as the price that **WILEY** planned to charge AR-Pistol machineguns in the future. During that exchange, **WILEY** told **HILL** that he had eight AR-Pistol machineguns available for \$1,300 each. **HILL** responded by stating that **WILEY** should sell the AR-Pistols for less, and that **WILEY** was wrong for demanding additional payment for the AR-Pistol machinegun sold on June 7, 2020. In response, **WILEY** stated, “I’m the one that lost money when I could easily make a call n get each one of them gone for 2 bands a piece,” and “nothing against nobody just not showing love on prices nomore gang or not,” indicating that **HILL** was already getting a low price because **WILEY**

could easily sell the AR-Pistol machineguns for \$2,000 each. **HILL** responded that he understood **WILEY**'s point, but added "ain't no price on loyalty."

19. On or about June 24, 2020, **EUGENE TRACY HILL** and **DIANTE ARIK WILEY** exchanged additional Instagram direct messages about AR-Pistol machineguns. During that exchange, **HILL** sent an Instagram direct message to **WILEY** stating "Bino one not gon hurt bruh," indicating that **WILEY** could afford not to collect additional payment for AR-Pistol machinegun sold on June 7, 2020. During that same exchange, **HILL** asked **WILEY** what type of ammunition fit into the AR-Pistol machinegun sold on June 7, 2020, stating "Aye Wat that last one Hold That we got From U. Wat kind food."

20. On or about June 25, 2020, **EUGENE TRACY HILL** sent an Instagram direct message to **DIANTE ARIK WILEY** informing **WILEY** that **HILL** needed another AR-Pistol machinegun and asking to see a picture of what **WILEY** had available, stating "Aye I need one send me a Pic rq."

21. On or about August 14, 2020, **EUGENE TRACY HILL** and **DIANTE ARIK WILEY** exchanged Instagram direct messages about AR-Pistol machineguns. During that exchange, **HILL** asked about the price of an AR-Pistol and **WILEY** stated "1300 or swap and 5" indicating that **WILEY** wanted \$1,300 cash or a handgun and \$500 cash in exchange for the AR-Pistol. **HILL** then asked for, and received, a picture of the AR-Pistol machinegun. Thereafter, **HILL** and **WILEY** negotiated over the price and **WILEY** agreed to sell the AR-Pistol machinegun to **HILL** for \$1200.

22. Between on or about February 7, 2021, and February 21, 2021, **EUGENE TRACY HILL** and **CO-CONSPIRATOR SIX** exchanged electronic messages regarding the sale of an

AR-Pistol machinegun from **HILL** to **CO-CONSPIRATOR SIX**. During this exchange, **HILL** agreed to sell an AR-Pistol machinegun to **CO-CONSPIRATOR SIX** for \$1,100.

23. On or about February 21, 2021, **EUGENE TRACEY HILL** and **CO-CONSPIRATOR SIX** exchanged electronic messages about transferring the AR-Pistol machinegun. **CO-CONSPIRATOR SIX** offered to pick up the AR-Pistol machinegun from **HILL** in the District of Columbia, but **HILL** offered to deliver the AR-Pistol machinegun to **CO-CONSPIRATOR SIX** in the Eastern District of Virginia.

24. On or about February 21, 2021, **EUGENE TRACEY HILL** transported the AR-Pistol machinegun from a location within the District of Columbia to a location in the Eastern District of Virginia as directed by **CO-CONSPIRATOR SIX**. Later that same day, **CO-CONSPIRATOR SIX** sent an electronic message to **HILL**, stating **CO-CONSPIRATOR SIX**'s belief that the AR-Pistol machinegun lacked the necessary parts to make it capable of fully automatic fire. **HILL** responded and instructed **CO-CONSPIRATOR SIX** on how to make the AR-Pistol machinegun function. **HILL** also told **CO-CONSPIRATOR SIX** to "wipe down" the extra ammunition so that **HILL**'s fingerprints were not on them.

(Conspiracy to Use, Carry, and Possess Machineguns During, in Relation to, and in Furtherance of Drug Trafficking Crimes, in violation of Title 18, United States Code, Section 924(o))

COUNT FOUR

On or about September 24, 2018, within the District of Columbia and elsewhere, **EUGENE TRACY HILL**, also known as "Geno," also known as "Cheese," did knowingly carry and use a semi-automatic assault rifle, that is, four .223 caliber M-16 type AR- Pistol Privately Manufactured Firearms (PMF) with no serial number, during and in relation to, and did knowingly possess said semi-automatic assault rifle in furtherance of, a drug trafficking crime for which he may be

prosecuted in a court of the United States, that is, Conspiracy to Distribute Marijuana and Oxycodone, as charged in Count One of this Indictment.

(Using, Carrying, and Possessing a Semi-Automatic Assault Rifle During and in Relation to, and in Furtherance of, a Drug Trafficking Offense, in violation of Title 18, United States Code, Section 924(c)(1)(B)(i)).

COUNT FIVE

On or about August 8, 2019, within the District of Columbia and elsewhere, **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” and **BROADUS JAMAL DANIELS**, also known as “Wardy,” did knowingly possess and transfer a machinegun, that is, a .223 caliber M-16 type AR- Pistol Privately Manufactured Firearm (PMF) with no serial number, that shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger.

(Illegal Possession and Transfer of a Machinegun, in violation of Title 18, United States Code, Section 922(o)).

COUNT SIX

On August 8, 2019, within the District of Columbia and elsewhere, **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” and **BROADUS JAMAL DANIELS**, also known as “Wardy,” did knowingly carry and use a machinegun, that is, a .223 caliber M-16 type AR- Pistol Privately Manufactured Firearm (PMF) with no serial number, that shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger, during and in relation to, and did knowingly possess said machinegun in furtherance of, a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Conspiracy to Distribute Marijuana and Oxycodone, as charged in Count One of this Indictment.

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

COUNT SEVEN

On or about June 7, 2020, within the District of Columbia and elsewhere, **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” **EUGENE TRACY HILL**, also known as “Geno,” also known as “Cheese,” and **ANDRE ALONTE WILLIS**, also known as “Boogie,” did knowingly possess and transfer a machinegun, that is, a 9mm AR- Pistol Privately Manufactured Firearm (PMF) with no serial number, that shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger.

(Illegal Possession and Transfer of a Machinegun, in violation of Title 18, United States Code, Sections 922(o), 2).

COUNT EIGHT

Beginning on or about June 7, 2020, and continuing until a date and time unknown, within the District of Columbia and elsewhere, **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” **EUGENE TRACY HILL**, also known as “Geno,” also known as “Cheese,” and **ANDRE ALONTE WILLIS**, also known as “Boogie,” did knowingly carry and use a machinegun, that is, a 9mm AR- Pistol Privately Manufactured Firearm (PMF) with no serial number, that shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger, during and in relation to, and did knowingly possess said machinegun in furtherance of, a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Conspiracy to Distribute Marijuana and Oxycodone, as charged in Count One of this Indictment.

(Using, Carrying, and Possessing a Machinegun During and in Relation to, and in Furtherance of, a Drug Trafficking Offense, in violation of Title 18, United States Code, Section 924(c)(1)(B)(ii), 2).

COUNT NINE

On or about August 14, 2020, within the District of Columbia and elsewhere, **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” and **EUGENE TRACY HILL**, also known as “Geno,” also known as “Cheese,” did knowingly possess and transfer a machinegun, that is, a .223 caliber M-16 type AR- Pistol Privately Manufactured Firearm (PMF) with no serial number, that shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger.

(Illegal Possession and Transfer of a Machinegun, in violation of Title 18, United States Code, Sections 922(o), 2).

COUNT TEN

On or about August 14, 2020, within the District of Columbia and elsewhere, **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” and **EUGENE TRACY HILL**, also known as “Geno,” also known as “Cheese,” did knowingly carry and use a machinegun, that is, a .223 caliber M-16 type AR- Pistol Privately Manufactured Firearm (PMF) with no serial number, that shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger, during and in relation to, and did knowingly possess said machinegun in furtherance of, a drug trafficking crime for which he may be prosecuted in a court of the United States, that is Conspiracy to Distribute Marijuana and Oxycodone, as charged in Count One of this Indictment.

(Using, Carrying, and Possessing a Machinegun During and in Relation to, and in Furtherance of, a Drug Trafficking Offense, in violation of Title 18, United States Code, Section 924(c)(1)(B)(ii), 2).

COUNT ELEVEN

On or about February 21, 2021, within the District of Columbia and elsewhere, **EUGENE TRACY HILL**, also known as “Geno,” also known as “Cheese,” did knowingly possess and transfer a machinegun, that is, a .223 caliber M-16 type AR- Pistol Privately Manufactured Firearm (PMF) with no serial number, that shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger.

(Illegal Possession and Transfer of a Machinegun, in violation of Title 18, United States Code, Section 922(o)).

COUNT TWELVE

On or about February 21, 2021, within the District of Columbia and elsewhere, **EUGENE TRACY HILL**, also known as “Geno,” also known as “Cheese,” did knowingly carry and use a machinegun, that is, a .223 caliber M-16 type AR-Pistol Privately Manufactured Firearm (PMF) with no serial number, that shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger, during and in relation to, and did knowingly possess said machinegun in furtherance of, a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Conspiracy to Distribute Marijuana and Oxycodone, as charged in Count One of this Indictment.

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

COUNT THIRTEEN

On or about April 9, 2021, within the District of Columbia and elsewhere, **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” did knowingly possess and transfer a machinegun, that is, a .223 caliber M-16 type Privately Manufactured Firearm (PMF) with no

serial number, that shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger.

(Illegal Possession and Transfer of a Machinegun, in violation of Title 18, United States Code, Section 922(o)).

COUNT FOURTEEN

On or about April 9, 2021, within the District of Columbia and elsewhere, **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” knowingly and intentionally distributed and possessed with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

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

COUNT FIFTEEN

On or about April 9, 2021, within the District of Columbia and elsewhere, **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” did knowingly carry and use a machinegun, that is, a .223 caliber M-16 type Privately Manufactured Firearm (PMF) with no serial number, that shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger, during and in relation to, and did knowingly possess said machinegun in furtherance of, a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Distribution and Possession With Intent to Distribute Marijuana, as charged in Count Fourteen of this Indictment.

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

COUNT SIXTEEN

On or about September 15, 2022, within the District of Columbia and elsewhere, **EUGENE TRACY HILL**, also known as “Geno,” also known as “Cheese,” knowingly and intentionally

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

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

COUNT SEVENTEEN

On or about September 15, 2022, within the District of Columbia and elsewhere, **EUGENE TRACY HILL**, also known as “Geno,” also known as “Cheese,” did knowingly carry and use a firearm, that is, a Glock, model 23, .40 caliber semi-automatic handgun bearing serial number VCU219, and a Glock, Model 43, 9mm semi-automatic handgun bearing serial number AEXZ257, during and in relation to, and did knowingly possess said firearm in furtherance of, a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Possession With Intent to Distribute Marijuana, as charged in Count Sixteen of this Indictment.

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

FORFEITURE ALLEGATION

1. Upon conviction of any of the offenses alleged in Count One, Count Fourteen, Count Sixteen, or Count Eighteen of this indictment, **EUGENE TRACY HILL**, also known as “Geno,” also known as “Cheese,” **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” **BROADUS JAMAL DANIELS**, also known as “Wardy,” and **ANDRE ALONTE WILLIS**, also known as “Boogie,” shall forfeit to the United States, pursuant to Title 21, United States Code, Section 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; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, these offenses.

2. Upon conviction of any of the offenses alleged in Count Two, Count Three, Count Four, Count Five, Count Six, Count Seven, Count Eight, Count Nine, Count Ten, Count Eleven, Count Twelve, Count Thirteen, Count Fifteen, Count Seventeen, or Count Nineteen of this Indictment, **EUGENE TRACY HILL**, also known as “Geno,” also known as “Cheese,” **DIANTE ARIK WILEY**, also known as “Sleez,” also known as “Taybino,” **BROADUS JAMAL DANIELS**, also known as “Wardy,” and **ANDRE ALONTE WILLIS**, also known as “Boogie,” 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 firearms and ammunition involved in or used in the knowing commission of the offense, including but not limited to:

- (a) Four (4) .223 caliber M-16 type semi-automatic assault rifle Privately Manufactured Firearms (PMFs) with no serial number (Count Three, Overt Act One; Count Four).
- (b) Fully automatic .223 caliber M-16 type PMFs with no serial number (Count Three, Overt Act Four; Count Five, Count Six).
- (c) Glock, Model 22, .40 caliver semi-automatic handgun. (Count Three, Overt Act Four).
- (d) Taurus, Model Unknown, 9mm semi-automatic handgun (Count Three, Overt Act Eleven).
- (e) Three (3) fully automatic .223 caliber M-16 type PMFs with no serial number (Count Three, Overt Act Thirteen).
- (f) Three (3) fully automatic 9mm PMFs with no serial number (Count Three, Overt Act Thirteen).
- (g) Fully automatic 9mm PMF with no serial number (Count Three, Overt Act Eighteen; Count Eight, Count Nine).
- (h) Eight (8) fully automatic .223 caliber M-16 type PMFs with no serial number (Count Three, Overt Act Nineteen).
- (i) Fully automatic .223 caliber M-16 type PMF with no serial number (Count Three, Overt Act Twenty-Two; Count Nine, Count Ten).
- (j) Glock, Model 26, 9mm semi-automatic handgun (Count Three, Overt Act Twenty-Three).

- (k) Fully automatic .223 caliber M-16 type PMF with no serial number (Count Three, Overt Act Twenty-Seven; Count Eleven, Count Twelve).
- (l) Fully automatic .223 caliber M-16 type PMF with no serial number (Count Thirteen, Count Fifteen).
- (m) Glock, Model 23, .40 caliber semi-automatic handgun bearing serial number VCU219 (Count Seventeen).
- (n) Glock, Model 43, 9mm semi-automatic handgun bearing serial number AEXZ257 (Count Seventeen).

3. 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 subdivided 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 Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

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

A TRUE BILL:

FOREPERSON.

Matthew M. Jones

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