

UNITED STATES DISTRICT COURT
for the
District of Maryland

United States of America
v.
Steven Umberto Angelini
Defendant(s)

Case No. 22-2101-ADC

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 2020 - May 2021 in the county of in the
District of Maryland, the defendant(s) violated:

Table with 2 columns: Code Section and Offense Description. Rows include 21 U.S.C. § 846, 21 U.S.C. 841(a), 18 U.S.C. 924(c), and 21 U.S.C. § 853.

This criminal complaint is based on these facts:

See affidavit.

Continued on the attached sheet.

Signature of Ryan Cooper, SA, FBI
Complainant's signature
Ryan Cooper, SA, FBI
Printed name and title

Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d).

Date: 12 July 2022

Signature of A. David Copperthite
Judge's signature

City and state: Baltimore, Maryland

Hon. A. David Copperthite, U.S Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Task Force Officer Ryan Cooper, being duly sworn does depose and state the following:

**PURPOSE OF THE AFFIDAVIT**

1. I submit this affidavit in support of a criminal complaint and arrest warrant for Steven Umberto ANGELINI charging him with committing the following violations: 1) conspiracy to distribute oxycodone and cocaine in violation of 21 U.S.C. § 846; (2) distribution of oxycodone in violation of 21 U.S.C. § 841(a); and possession of a firearm in furtherance of a drug trafficking crime in violation of 18 U.S.C. 924(c).

**AGENT BACKGROUND**

2. I am a detective with the Baltimore County Police Department ("BCPD"). I have been so employed since April 1996. I am currently assigned to the Baltimore County Police Department Intelligence Unit and I am assigned as a Task Force Officer with the Federal Bureau of Investigation (FBI) Baltimore Division. I am an officer of the United States who is empowered by Title 21 of the United States Code, Section 878, to conduct investigations of and make arrests for offenses against the United States. As a member of the Baltimore County Police Department, I have prepared or written numerous state and federal search and seizure warrants for many different crimes including murder and attempted murder, kidnapping, robbery, firearms violations, narcotics violations, contraband cigarette trafficking, money laundering, and interstate transportation of stolen property. Many of these investigations have been based on digital evidence collected and analyzed from mobile phones, laptop computers, email accounts, online social media accounts, and cell tower records. This information has provided evidence of the planning,

execution, and concealment of various crimes and I have used this evidence to investigate and prosecute these crimes.

3. As a law enforcement officer, I have learned about the illegal activities of drug trafficking organizations and other organized groups, including unlawful drug distribution, public corruption (involving law enforcement personnel), and use of cellular telephones to facilitate illegal activity, aggravated assaults, and homicides. Through my training, knowledge and experience I have become familiar with techniques useful in identifying this behavior, including the use of confidential informants, physical and electronic surveillance, telephone toll analysis, and investigative interviews. I have become familiar with the terminology and codes used by narcotic suppliers to thwart detection by law enforcement.

4. I have personally participated in the investigation of the offenses referred to herein and have reviewed reports and have had discussions with other Special Agents, Task Force Officers (TFOs), and employees of the FBI, as well as other law enforcement agencies related to the investigation of the subjects. I am fully familiar with the facts and circumstances of the investigation.

5. Because this Affidavit is being submitted for the limited purpose of establishing probable cause for the requested warrant, I have not included every detail or every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause. I have not, however, excluded any information known to me that would defeat a determination of probable cause. The information contained in this Affidavit is based upon my personal knowledge, my review of documents and other evidence, and my conversations with other law enforcement officers and other individuals. All conversations and statements described in this Affidavit are related in substance and in part unless otherwise indicated. Summaries and

descriptions, including quotations of recorded conversations (if any) are based on a review of audio recordings and draft transcripts.

## **BACKGROUND AND OVERVIEW OF THE INVESTIGATION**

6. Since January 2021, the Baltimore County Police Department (“BCPD”) Narcotics Unit has been conducting an investigation into the distribution of controlled dangerous substances (“CDS”) by CO-CONSPIRATOR 1. Based upon confidential informants, physical and electronic surveillance, controlled purchases of CDS, cell phone analysis, as well as other methods of investigation, investigators were able to determine that CO-CONSPIRATOR 1 and other co-conspirators are distributing significant quantities of CDS throughout the Baltimore Metropolitan area. CO-CONSPIRATOR 1, is the Maryland President of Presidents of the Infamous Ryders Motorcycle Club.

7. As a part of the investigation, BCPD applied for authorization to intercept wire and electronic communications to and from cellular telephone number 443-676-4654, utilized by CO-CONSPIRATOR 1 (“CO-CONSPIRATOR 1’s Cellphone”), which was authorized by the Honorable Garret P. Glennon, Associate Judge for the Baltimore County Circuit Court, Maryland on February 22, 2022. Investigators applied for reauthorization to intercept wire and electronic communications to and from CO-CONSPIRATOR 1’s Cellphone on March 21, 2022. Investigators applied for a second reauthorization to intercept wire and electronic communications to and from CO-CONSPIRATOR 1’s Cellphone on April 21, 2022.

8. Additionally, on May 25, 2022, CO-CONSPIRATOR 1’s cellphone was seized from his residence in Essex, Maryland. CO-CONSPIRATOR 1 was arrested at the same time at his residence. A search warrant for his residence, person, vehicle, and electronic devices was authorized by the Honorable Garrett P. Glennon, Associate Judge of the Circuit Court for

Baltimore County, Maryland on May 23, 2022.

9. The intercepted communications from CO-CONSPIRATOR 1's Cellphone corroborated the initial investigation into his CDS trafficking activities and identified multiple co-conspirators that were involved in his organization. CO-CONSPIRATOR 1, and other members of the conspiracy, used 4603 York Road, Baltimore, Maryland, as a clubhouse for the Infamous Ryders. Furthermore, members of the conspiracy including CO-CONSPIRATOR 1, used this location for narcotics trafficking operations. Members of the conspiracy used the Coach House, a bar, and Killa Dogz, a hot dog stand, both located at 6605 Belair Road, Baltimore Maryland, for their narcotics trafficking operations.

10. One of the co-conspirators identified from the investigation is Steven Umberto ANGELINI ("ANGELINI"). ANGELINI is a sworn officer with the Baltimore Police Department (BPD). Based upon intercepted communications as well as physical and electronic surveillance, along with other investigative methods, investigators were able to determine that ANGELINI is an associate of CO-CONSPIRATOR 1 and that ANGELINI is currently supplying CO-CONSPIRATOR 1 with prescription pills, specifically oxycodone, a schedule II CDS. Furthermore, investigators were able to determine that CO-CONSPIRATOR 1 is supplying ANGELINI amounts of cocaine in exchange for both money as well as firearms, firearms accessories, and ammunition that ANGELINI is purchasing specifically for CO-CONSPIRATOR 1.<sup>1</sup> Finally, investigators have learned that ANGELINI is supplying CO-CONSPIRATOR 1 with sensitive law enforcement information that furthers CO-CONSPIRATOR 1's drug trafficking activity, specifically, ANGELINI has provided CO-CONSPIRATOR 1 with information related

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<sup>1</sup> Based upon a felony conviction on April 29, 1998 for the Unlawful Manufacture of CDS, CO-CONSPIRATOR 1 is prohibited in the State of Maryland from possessing firearms.

to the murder of an individual who was distributing narcotics for CO-CONSPIRATOR 1 so that CO-CONSPIRATOR 1 could retaliate against the individual suspected of the murder.

**Steven Umberto ANGELINI**

11. ANGELINI is a white male with a Date of Birth (DOB) of July 29, 1980. He currently resides at 402 Kosoak Road Middle River, Md. 21220 and has been seen on physical and electronic surveillance driving a blue Mazda 6 with Maryland registration FPD7032. Investigation has revealed that his phone number is 443-425-2368 subscribed to Comcast with wireless service provided by Verizon (ANGELINI's cellphone). ANGELINI is currently a sworn officer with the BPD and has been since May 4, 2006. He has been assigned to multiple patrol and investigative units throughout his career. He is currently suspended and assigned to the Administrative Duties Division.

**PROBABLE CAUSE**

**A. Angelini Trades Sensitive Law Enforcement Information on the Murder of a Co-Conspirator in Exchange for Narcotics**

12. On January 6, 2022, ANGELINI reached out to CO-CONSPIRATOR 1 by text message and offered to sell him 90 "pinks" (oxycodone). The following is a portion of their conversation:

3:45:35PM	ANGELINI	Sell this pinks for some dogs bro if u have any buddy . Trade  *4 images and files attached*
3:45:54PM	ANGELINI	I have 90 of them
3:46:17PM	ANGELINI	Jess was next to me that's why I had to be on low
3:47:07PM	ANGELINI	Or can do half for \$8 a piece and some dog
3:47:07PM	CO-CONSPIRATOR 1	Yeah I want them,
3:47:13PM	S. ANG.	Ok buddy
3:47:27PM	S. ANG.	There yours
3:47:34PM	CO-CONSPIRATOR 1	Damn that high bro damn I can't do that

3:47:45PM	S. ANG.	\$5 piece
3:48:00PM	CO-CONSPIRATOR 1	Won't be making nothing yeah I do it for 5
3:48:19PM	S. ANG.	Ok got 90 anyway u know anyone with any dog

Based on training knowledge, and experience, investigators believe that the two negotiated the price for the oxycodone and ANGELINI agreed to the sell the pills for \$5 apiece. During this exchange, ANGELINI mentioned that he was trying to get "dog" (cocaine). The text conversation between the two then continued:

<b>Time</b>	<b>Sender</b>	<b>Message</b>
3:48:34 PM	ANGELINI	I was getting from D and he gone
3:48:37 PM	ANGELINI	So said
3:48:44 PM	ANGELINI	I fucked in the head
3:48:50 PM	ANGELINI	Now and pissed
3:49:54 PM	CO-CONSPIRATOR 1	Yeah I got u I'm only dealing with a select few
3:50:14 PM	ANGELINI	Ok awesome give me ball and \$200 and they yours that fair
3:51:27 PM	ANGELINI	Bro I am calling homicide tomorrow and finding out any info and want that mother fucker caught
3:51:51 PM	ANGELINI	I'm so said bro I don't know that happened. No wonder is phone wasn't working
3:52:01 PM	ANGELINI	I tried and tried over and over
3:52:30 PM	ANGELINI	I would hand with like a couple times a week and we grab some lunch and shit . Can't believe it
3:52:46 PM	ANGELINI	I pissed bro tomorrow I will get some information from Homicide
3:52:58 PM	CO-CONSPIRATOR 1	Ok cool

ANGELINI then stated that he had been getting his supply from "D" but that "D" was "gone." Investigators believe that ANGELINI was referring to the fact that "D," a drug dealer working for

CO-CONSPIRATOR 1<sup>2</sup>, had been murdered. ANGELINI then offered twice to go to the Baltimore City Department Homicide Unit to obtain any information about the investigation. CO-CONSPIRATOR 1 and ANGELINI then continued their text exchange to coordinate the exchange of oxycodone pills for cocaine:

<u>Time</u>	<u>Sender</u>	<u>Message</u>
3:54:07 PM	ANGELINI	Is that cool u give me \$200 plus ball dog and even . I get them every month too
4:00:06 PM	ANGELINI	Just let me know when your good to meet up and I can meet u buddy . Thanks
4:09:42 PM	ANGELINI	I live middle river so ain't too far from u
4:12:41 PM	CO-CONSPIRATOR 1	But my balls 250
4:13:15 PM	ANGELINI	Ok then give me \$100 and the ball we call it even buddy

Based on training knowledge and experience, investigators believe that ANGELINI agreed to give CO-CONSPIRATOR 1 90 pills oxycodone in exchange for \$100 and an eight of an ounce of cocaine ("the ball").

13. The next day, on January 7, 2022, at 9:15 a.m., ANGELINI sent CO-CONSPIRATOR 1 a series of text messages, updating him on the information he was able to obtain on the murder of "D." Specifically, ANGELINI told CO-CONSPIRATOR 1 that he received some information on the case and some pictures. During their conversation, CO-CONSPIRATOR 1 asked for a copy of a video of the murder obtained by BPD homicide detectives

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<sup>2</sup> Based on phone record analysis and video surveillance, "D" was identified as a member of Co-Conspirator's 1's narcotics trafficking organization. On several occasions in 2021, "D" was observed conducting activity that was consistent with someone involved in the street level distribution of narcotics. As an example, on June 21, 2021 "D" was observed on video surveillance conducting what detectives recognized through their training, knowledge, and experience to be a hand to hand drug transaction with an unknown male in front of Coach House. Later that evening, "D" was observed on video surveillance meeting with Co-conspirator 1 outside of Coach House. During this meeting, Co-conspirator 1 was observed handing "D" a small knotted plastic baggie containing a white powder. "D" immediately put this baggie in his pants pockets. Detectives recognized this activity through their training, knowledge, and experience to be consistent with a drug transaction where Co-conspirator 1 provided "D" with a bag suspected to contain cocaine.



from a local business that had a camera trained on the scene of the murder.

<u>Time</u>	<u>Sender</u>	<u>Message</u>
2:56:33 PM	CO-CONSPIRATOR 1	Bro get that footage I hit you off right bro.
2:57:18 PM	ANGELINI	I am getting don't u worry . 100 percent
2:57:24 PM	ANGELINI	We talk soon
2:57:38 PM	ANGELINI	I am pissed bro .
2:57:52 PM	ANGELINI	He didn't deserve it bro
2:59:06 PM	CO-CONSPIRATOR 1	Bro you kno he didn't bro closer is everything to me right now I got a few ideas

ANGELINI sent 9 photographs of his work computer screen from a cellphone to CO-CONSPIRATOR 1. In those photographs, ANGELINI captured images of BPD intelligence reports, and BPD incident reports, with details about the murder investigation, including photographs and other information pertaining to the suspect.

14. On January 10, 2022, ANGELINI sent an update to CO-CONSPIRATOR 1 about new information regarding the murder of "D":

<u>Time</u>	<u>Sender</u>	<u>Message</u>
3:47:36 PM	ANGELINI	One thing I saw and forgot to tell u is that Baby D got out of the vehicle and someone in that vehicle then shot him .
3:47:58 PM	ANGELINI	In Jeep renagade
3:49:13 PM	CO-CONSPIRATOR 1	Yeah bro I know I that I though u was going to get video and tag but it's all good get well soon.
3:50:10 PM	CO-CONSPIRATOR 1	They shot him in the truck

15. On January 14, 2022, ANGELINI followed up with CO-CONSPIRATOR 1 and told him that he had the video. ANGELINI asked to meet with CO-CONSPIRATOR 1 to give him the video and to buy another "ball" (one eighth ounce of cocaine):

<u>Time</u>	<u>Sender</u>	<u>Message</u>
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1:12:36 PM	ANGELINI	Hey bro got the video on my drive . Can I meet u later and give u that and buy another ball from you . Got the cash.
1:14:19 PM	ANGELINI	Got it on here I will give u the drive and u stick in a computer to watch . Please don't let anyone see it. I know u won't thanks .  *image and file attached* (image of a USB drive)
1:21:08 PM	ANGELINI	I will bring \$250 with buddy . Just text me when I can meet u hot dog stand . Or wherever u want thanks
1:46:32 PM	CO-CONSPIRATOR 1	Yes bro

On the same day, at approximately 7:24 p.m., CO-CONSPIRATOR 1 sent a text message to ANGELINI and said that the USB drive ANGELINI gave him was empty. ANGELINI apologized and admitted he made a mistake transferring the file. He promised CO-CONSPIRATOR 1 to get him the original file. ANGELINI then suggested transferring it to CO-CONSPIRATOR 1 using Google Drive. That effort failed. On January 16, 2022, CO-CONSPIRATOR 1 sent ANGELINI a text saying that he never got it.

16. On January 25, 2022, ANGELINI texted CO-CONSPIRATOR 1 and updated him about his attempts to obtain the murder video for CO-CONSPIRATOR 1:

<b>Time</b>	<b>Sender</b>	<b>Message</b>
3:48:13 PM	ANGELINI	Meeting with Detective on Friday morning if u still want to see it . He finally called me back and apologized for giving me the blocked one
3:50:36 PM	ANGELINI	I am going to take a ride up to that place who had the video right now and see if they still have copy and get them to let me record it . Show them my badge
4:29:20 PM	CO-CONSPIRATOR 1	Ok yeah it's just that we had a deal
4:29:45 PM	CO-CONSPIRATOR 1	I hooked i up for it
4:30:31 PM	ANGELINI	I know bro . I would never do u wrong bro I promise u that . I will have it 100 percent

		Friday morning. No reason to lie to u bro . I respect u too much for that .
4:30:48 PM	ANGELINI	Plus baby D was my boy too

ANGELINI told CO-CONSPIRATOR 1 that he had contacted the detective who had given him the video and arranged to meet with him again. ANGELINI also promised CO-CONSPIRATOR 1 that if that didn't work, ANGELINI would go directly to the business that recorded the original video of the murder and "show them his badge." In other words he would, use his police powers, to obtain a copy of the video for CO-CONSPIRATOR 1. CO-CONSPIRATOR 1 reminded ANGELINI that the two had a deal and that CO-CONSPIRATOR 1 had given ANGELINI drugs because he believed ANGELINI was going to get him the video of the murder.

17. Following these text exchanges on January 25, 2022, the contact between ANGELINI and CO-CONSPIRATOR 1 was minimal until April 8, 2022, when ANGELINI reached out to CO-CONSPIRATOR 1 to sell him a firearm.

**B. Angelini Sold PMF Firearm to CO-CONSPIRATOR 1 for \$300 and Cocaine**

18. During the late afternoon and early evening hours of April 8, 2022, several communications between CO-CONSPIRATOR 1 and ANGELINI as well as between CO-CONSPIRATOR 1 and CO-CONSPIRATOR 2 were intercepted over the wire interception of CO-CONSPIRATOR 1's Cellphone.<sup>3</sup> Based upon these intercepted communications as well as physical and electronic surveillance, investigators determined that CO-CONSPIRATOR 1 and CO-CONSPIRATOR 2 provided ANGELINI with an amount of cocaine in exchange for a firearm and ammunition.

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<sup>3</sup> CO-CONSPIRATOR 2 is a bartender at the Coach House bar which is owned by CO-CONSPIRATOR 1. Based on the investigation, investigators know that CO-CONSPIRATOR 2 is a close associate of CO-CONSPIRATOR 1 and will help distribute CO-CONSPIRATOR 1's supply of cocaine and oxycodone to numerous customers.

19. ANGELINI first initiated contact with CO-CONSPIRATOR 1 by text message:

12:55:14 PM	ANGELINI	Hey bro it's Steve ANGELINI hope u ain't still mad at me buddy . I tried everything to get the video . But anyway selling this Ar ghost for a good deal if you interested. I built and it's 9mm AR 10 inch with colt magazine . Ghost diamond sites with night sights . Let me know if u interested for a good deal .  *Two images and attached files* (gun)
12:55:55 PM	CO-CONSPIRATOR 1	How much
12:56:30 PM	ANGELINI	For u \$300 plus a ball . U can't beat that I put \$900 in it
12:56:51 PM	CO-CONSPIRATOR 1	Ok yeah I take it
12:56:58 PM	ANGELINI	It's yours
12:57:03 PM	ANGELINI	Nice ass shit
12:57:14 PM	CO-CONSPIRATOR 1	I got three of the same ones so that's fair
12:57:15 PM	ANGELINI	I put 50 rounds through it and shoots perfect
12:57:51 PM	ANGELINI	Cool bro I'm glad u ain't mad at me bro . I am sorry I tried everything buddy . I swear .
12:58:24 PM	ANGELINI	U want meet up later let me know . I got a red dot I will throw in for free
12:58:58 PM	ANGELINI	Give u some hollows too if u need any
12:59:04 PM	CO-CONSPIRATOR 1	It was not the fact I was Madd I just didn't understand why you lie about it you you how I felt about it.
12:59:36 PM	ANGELINI	I know bro though he was going to give it to me it was my fault .because I jumped the gun
12:59:44 PM	CO-CONSPIRATOR 1	Yeah I need a red dot and anything you can spare
1:00:05 PM	ANGELINI	I promised u something that I was not 100 percent on. My apologies
1:00:11 PM	ANGELINI	Neve do that again.
1:00:50 PM	ANGELINI	U trying to meet up today or later. And yeah sen u pic of red dot I will put on it . Nice and I will load mag with hollow for u
1:08:04 PM	ANGELINI	The brace is nice too because it extends too
1:08:22 PM	ANGELINI	In and out . The sights are pop up and down
1:09:16 PM	CO-CONSPIRATOR 1	Cool just me arc
1:09:16 PM	ANGELINI	*Image and attached file*
1:09:25 PM	ANGELINI	Which one the right is 3x zoom
1:11:46 PM	ANGELINI	*Image and attached file*
1:12:13 PM	ANGELINI	The one is red dot with 3x zoom
1:12:23 PM	ANGELINI	*Image and attached file* (rifle)

1:12:30 PM	ANGELINI	Co witnessed too
1:13:35 PM	ANGELINI	*Image and attached file*
1:14:00 PM	ANGELINI	What your last text meek buddy
1:14:29 PM	ANGELINI	I will leave the colt magazine full with 30 rounds and bring u some hollow 9mm too
1:15:50 PM	CO-CONSPIRATOR 1	What u mean 9mm
1:16:38 PM	ANGELINI	Shoots 9mm rounds I built a 9mm Ar
1:16:56 PM	CO-CONSPIRATOR 1	Damn that's what's up
1:17:05 PM	ANGELINI	Yeah way better
1:17:37 PM	ANGELINI	It takes colt magazines I have 1 for u
1:17:43 PM	CO-CONSPIRATOR 1	Is that more damage you think
1:17:49 PM	ANGELINI	Fucking right
1:17:59 PM	ANGELINI	Plus Hollow points unbelievable
1:18:31 PM	ANGELINI	Everything I put on it is best parts
1:19:01 PM	ANGELINI	Plus 9mm is what everyone is going too now
1:21:49 PM	ANGELINI	Just let me know what time u want me to meet u and I will bring everything buddy .
1:23:44 PM	ANGELINI	I will bring in it book bag u can have .
1:25:31 PM	CO-CONSPIRATOR 1	Ok
1:25:37 PM	CO-CONSPIRATOR 1	Like 5
1:27:35 PM	ANGELINI	Sounds good bro up the bar right ?

Based on training knowledge and experience, investigators believe that ANGELINI contacted CO-CONSPIRATOR 1 about the sale of a privately made firearm without a serial number designed to be fired single handedly or from the shoulder ("PMF firearm") for \$300 plus a "ball" (an eighth of an ounce of cocaine) ANGELINI also offered ammunition on top of the sale of this firearm, in an attempt to make amends for the fact that ANGELINI failed to obtain the video of the murder of "D" in January.

20. On the same day, at approximately 4:51 p.m., investigators intercepted over CO-CONSPIRATOR 1's Cellphone an outgoing call to ANGELINI's cellphone was intercepted. During this call CO-CONSPIRATOR 1 and ANGELINI agreed to meet at the Coach House bar around 6:00 p.m. on the same date. At approximately 5:48 p.m., investigators observed ANGELINI's vehicle bearing Maryland registration FPD7032 arrive at the rear parking lot of the

Coach House. ANGELINI was observed exiting the vehicle and walking towards the rear entrance of the bar.

21. At approximately 6:13 p.m., investigators intercepted over CO-CONSPIRATOR 1's Cellphone an outgoing call to CO-CONSPIRATOR 2 using cellphone number 443-416-0704.

The following is a pertinent portion of that conversation:

CO-CONSPIRATOR 2: Hello.

CO-CONSPIRATOR 1: Hello.

CO-CONSPIRATOR 2: Yeah.

CO-CONSPIRATOR 1: Yeah, uhh... Can you do me a favor?

CO-CONSPIRATOR 2: What's that?

CO-CONSPIRATOR 1: Can you do what he did? And go and get that uh... For me?  
And put it in the car.

CO-CONSPIRATOR 2: Put it in my car? .

CO-CONSPIRATOR 1: Yeah.

CO-CONSPIRATOR 2: Okay. What, are you coming up?

CO-CONSPIRATOR 1: Yeah, I'm on my way. I'm 'bout to—

CO-CONSPIRATOR 2: Oh, okay. Okay

CO-CONSPIRATOR 1: Uh...

CO-CONSPIRATOR 2: So just give him what, umm, give him what he wants? And then—

CO-CONSPIRATOR 1: Yeah a pool—a pool table and three hundred (300), uh, t  
three hundred (300).

CO-CONSPIRATOR 2: Okay.

CO-CONSPIRATOR 1: Alright?

CO-CONSPIRATOR 2: Alright babe.

CO-CONSPIRATOR 1: Okay.

CO-CONSPIRATOR 2: Alright, bye.

At 6:14 p.m., CO-CONSPIRATOR 2, using cellphone number 443-416-0704, called CO-CONSPIRATOR 1 back to verify that she should give ANGELINI the additional \$300. The following is a pertinent portion of the conversation:

CO-CONSPIRATOR 1: Hello.

CO-CONSPIRATOR 2: Yeah, you said plus three-hundred (300) right?

CO-CONSPIRATOR 1: Huh?

CO-CONSPIRATOR 2: You said plus three hundred (300)?

CO-CONSPIRATOR 1: Yeah, I think that's what—yeah, hold on. Yeah do that, babe.

CO-CONSPIRATOR 2: Okay. Alright, I got you.

CO-CONSPIRATOR 1: Alright.

CO-CONSPIRATOR 2: Alright, bye.

22. At 6:17 p.m., ANGELINI called CO-CONSPIRATOR 1 to confirm their meeting. CO-CONSPIRATOR 1 told ANGELINI that he would meet him later but that Co-Conspirator 2 would conduct the transaction for CO-CONSPIRATOR 1. ANGELINI then explained that he took the pins out of the PMF firearm so it would fit in the bag. ANGELINI also offered to re-assemble the firearm for CO-CONSPIRATOR 1:

ANGELINI: ... Aye, Keith.

CO-CONSPIRATOR 1: Yeah.

ANGELINI: How fa—uh, how far are you out, buddy?

CO-CONSPIRATOR 1: Uhh, [Co-Conspirator 2] gonna do that, man. Just uh, hold your side of the deal though just give her—

ANGELINI: Buddy, listen buddy, bro'—bro', I swear to God to you, I'm actually hooking you up extra, bro, 'cause of what happened.

CO-CONSPIRATOR 1: No, I can't really talk on here bro, just hold your side up, please. I'll talk to you in person I just—I'ma be about another hour.

ANGELINI: Another hour?

CO-CONSPIRATOR 1: Yeah, but I told her [Co-Conspirator 2] probably gonna make it happen, just give it to her.

ANGELINI: Oh, okay, yeah, yeah, yeah leave the—leave the bag in there?

CO-CONSPIRATOR 1: Yeah.

ANGELINI: Okay, but let you know that I—I took—you know how to put it—you know how to put it together, right? It's already together, but you—I—I took the pins off to put—fit it in the bag, you know what I'm talking about? I'll put it all together, I'll put it back together.

CO-CONSPIRATOR 1: Yeah, I don't really know how to do that.

ANGELINI: I'll put it back together for you, alright.

CO-CONSPIRATOR 1: Alright.

ANGELINI: Alright, bye.

23. At 6:18 p.m. ANGELINI met with Co-Conspirator 2 in the rear area of the Coach House. ANGELINI opened the trunk of his vehicle and removed a black and red backpack style bag and walked back towards the Coach House with Co-Conspirator 2. At 6:22 p.m., ANGELINI returned to his vehicle and left the parking lot. At the same time, ANGELINI called CO-CONSPIRATOR 1 and confirmed that the transaction occurred, and provided CO-



CONSPIRATOR 1 more information about the PMF firearm. He informed CO-CONSPIRATOR 1 that the night sights on the firearm were “a hundred dollars a piece.” CO-CONSPIRATOR 1 then attempted to stop ANGELINI from saying more telling him, “Yeah, I can’t talk on here bro.”

**C. ANGELINI provided Oxycodone to CO-CONSPIRATOR 1 for Distribution**

24. On April 25, 2022, at 4:40 p.m., CO-CONSPIRATOR 1 texted ANGELINI and asked him if he had any “pinks” (oxycodone) for him. ANGELINI confirmed he did texting back, “May 4th got the 7.5 can give u them for free got like 30.” At approximately 5:48p.m. CO-CONSPIRATOR 1 called ANGELINI who confirmed that he counted the pills in the bottle and had, “twenty (20) of them on me. I thought I had thirty (30) there’s twenty (20). Is that alright? You still want ‘em right?” CO-CONSPIRATOR 1 confirmed that he did. Later in the conversation, ANGELINI told CO-CONSPIRATOR 1, “this is still—still a make up for what I owe you bro, I can—you know, I can get rid of these if I wanted to, I’ll hook you up with ‘em because you’re my man.” At approximately 6:43 p.m. ANGELINI met with CO-CONSPIRATOR 1 outside of the Coach House bar.

25. Following this meeting with ANGELINI, at approximately 6:48 p.m., CO-CONSPIRATOR 1 called a customer of his and informed him that he just got some “seven-point fives” (oxycodone) and asked if he was interested in these pills. The customer responded, “the twenties (20s) are fine it’s just the price is ridiculous right now.” CO-CONSPIRATOR 1 agreed to give them to the customer for \$12.

**D. Angelini Purchased Ammunition and Firearm Parts for CO-CONSPIRATOR 1**

26. On April 26, 2022, at approximately 10:40 a.m., ANGELINI texted CO-CONSPIRATOR 1 telling him that he was at a gun shop. ANGELINI stated that he had just been

paid and was trying to purchase an eighth of an ounce of cocaine from CO-CONSPIRATOR 1, and offered to purchase ammunition and various other firearm accessories for him:

10:40:11 AM	ANGELINI	At the shop now bought 1 for thing I got a few weeks and 1 for other . I got lucky and got the last 2 they low on stock . but I will check other shop too . Give me a shout later and I will meet u up with u again . I got paid today so if u don't mind I need a ball . The things I bought you on me buddy . And I have the cash for other bro. I appreciate it . Do need any those nerf bullets I gave u last time got some extra in 9 inches u know what I mean .
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While ANGELINI was still in that gun shop, he and CO-CONSPIRATOR 1 discussed over the phone, the correct magazine that CO-CONSPIRATOR 1 should use for the PMF firearm that ANGELINI just sold him:

ANGELINI: The one—the one that I—the nerf gun that I got—that you got from me last—I gave to you last time, that—that takes Colt mags... you hear me?

CO-CONSPIRATOR 1: It take nine, right?

ANGELINI: I'm sorry?

CO-CONSPIRATOR 1: It take the nines, right?

ANGELINI: Yeah, it takes, yeah, it takes the—the—the regular nine millimeter [U/I]

CO-CONSPIRATOR 1: Yeah, yeah, yeah.

ANGELINI: But—but it takes—you can't use a mag—a mag—a Glock mag in that. So I'll get you another one of those too.

ANGELINI and CO-CONSPIRATOR 1 also discussed what types of ammunition he was planning to purchase:

ANGELINI: Alright, I'll put these back. Alright, so I bring down, then I got—I got two boxes of the nine millimeters, they're fifty—

fifty rounds each—each box. And [AUDIO BREAKS] hollow-points or not?

CO-CONSPIRATOR 1: Huh?

ANGELINI: You—you want hollow-points or regulars? Cause all [AUDIO BREAKS]

CO-CONSPIRATOR 1: Yeah hollow.

ANGELINI: Okay, I got—I'mma get you one box of the hollow-points, right? And then I'mma get you two boxes of regular uh, uh, for you to shoot at the range. You know what I mean?

CO-CONSPIRATOR 1: Okay.

Investigators know that hollow-point bullets are ammunition that expand upon impact and are more lethal. Full metal jacket rounds of ammunition (regulars) are less expensive and are typically used for range shooting. ANGELINI then confirmed with CO-CONSPIRATOR 1 that all of the items he purchased would be in exchange for an eighth of an ounce of cocaine (the ball), and ANGELINI would give CO-CONSPIRATOR 1 the remaining items to cover for the fact that ANGELINI had not provided him with the video of the murder:

ANGELINI: Yeah, we'll work it out, we'll work it out buddy. But no, I'll just take the—I'll just take the ball, any other stuff, it's on me you hear me? You feel me bro?

CO-CONSPIRATOR 1: Yeah, I got you.

ANGELINI: A'ight so uhh, let me pay real quick. Alright buddy, and then I'm done, I think I got everything for you.

CO-CONSPIRATOR 1: Okay.

ANGELINI: Alright bro, a lot of shit, a heavy ass bag here bro, god damn man.

In total, ANGELINI spent \$543.60 at the gun shop purchasing items for CO-CONSPIRATOR 1.

27. At 7:54 p.m. ANGELINI arrived at the the Coach House bar in his vehicle and shortly thereafter entered the bar. At 8:02 p.m., he exited the Coach House bar and entered Killa Dogz. He then exited Killa Dogz and went to the trunk of his vehicle to retrieve a plastic shopping bag. At 8:04 p.m. ANGELINI re-entered Killa Dogz with the shopping bag.

E. **ANGELINI Sold Oxycodone to Give to Co-Conspirator 1**

28. On May 4, 2022, investigators conducted physical surveillance and observed ANGELINI go to the Maryland Pain Center located at 7106 Ridge Road Rosedale, Md. 21237. At 3:16 p.m., surveillance continued and ANGELINI was observed goingt to a Walgreens at 6 Carroll Island Road, Middle River, Md. 21220 where he picked up a prescription for 90 Oxycodone 10m pills.

29. At 3:22 p.m., ANGELINI called CO-CONSPIRATOR 1 and notified him that he had picked up the pills and the two discussed how much CO-CONSPIRATOR 1 would pay ANGELINI for the pills:

ANGELINI: So do you, I don't know what, you still want them, or not?

CO-CONSPIRATOR 1: Yeah, I'll take 'em, it's just a little weaker. You gotta do more.

ANGELINI: A'ight. So, what do you wanna do for them for? Like four dollars a piece?

CO-CONSPIRATOR 1: Cool.

ANGELINI: Three, or we do four dollars apiece and then...

CO-CONSPIRATOR 1: You said four dollars?

ANGELINI: Huh?

CO-CONSPIRATOR 1: You said four dollars?

ANGELINI: What do you think is fair bro?

CO-CONSPIRATOR 1: They only tens, right?

ANGELINI: I mean, be honest. Three dollars I guess? I don't know, three-fifty? You there?

CO-CONSPIRATOR 1: Yeah, I was trying to think.

ANGELINI: Let's do this, three dollars apiece and just give me uh and deduct a hundred bag off for me.

CO-CONSPIRATOR 1: You say what?

ANGELINI: Hold on, let me see. Hold on, let me see how much. Let me see something real quick. Calculate, calculator let's see. Say three times ninety is—equals two seventy right?

CO-CONSPIRATOR 1: Yeah.

ANGELINI: Just give—just give me one, give me one seventy and give me a uh a hundred uh of what you call it. That fair enough?

CO-CONSPIRATOR 1: Yeah, I'll do it...

ANGELINI: A'ight. That sounds good. I'ma uh, I'm gonna head there right now.

Based on training knowledge and experience, investigators believe that ultimately, ANGELINI agreed to sell CO-CONSPIRATOR 1 the oxycodone pills for \$3 per pill. ANGELINI asked for \$170 in cash and \$100 worth of cocaine.

30. At approximately 3:42 p.m., investigators observed ANGELINI pull into the rear lot of the Coach House bar. He exited his vehicle and walked towards the rear entrance. At approximately the same time an incoming call to Co-Conspirator 1 from ANGELINI was intercepted in which ANGELINI told Co-Conspirator 1 that he was at the location. At

approximately 3:43 p.m., ANGELINI was observed walking back to his vehicle from the rear of the Coach House bar. He entered his vehicle and left the location.

31. At approximately 3:46 p.m., Co-Conspirator 1's cellphone received an incoming text message from Cash App: "Steven Angelini requested 170, Open Cash App to approve or decline."

**Conclusion**

To the best of my knowledge and belief, all statements made in this affidavit are true and correct. Based on the foregoing facts I believe probable cause exists supporting the issuance of a Criminal Complaint charging the following: Steven Umberto ANGELINI committed the following violations: 1) conspiracy to distribute oxycodone and cocaine beginning in January of 2022 up through the date of this criminal complaint, in violation of 21 U.S.C. § 846; (2) distribution of oxycodone on or about May 4, 2022, in violation of 21 U.S.C. § 841(a); and possession of a firearm in furtherance of a drug trafficking crime, on or about April 8, 2022, in violation of 18 U.S.C. 924(c).



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Ryan Cooper  
Task Force Officer, Federal Bureau of Investigation

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) on this 12<sup>th</sup> day of July 2022.

*A. David Copperthite*  
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A. David Copperthite  
UNITED STATES MAGISTRATE JUDGE