

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-mj-6411-PAB



UNITED STATES OF AMERICA,

v.

DESHAWN BREEDLOVE,

Defendant.

_____ /

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
4. Did this matter involve the participation of or consultation now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: /s/Kevin D. Gerarde
KEVIN D. GERARDE
ASSISTANT UNITED STATES ATTORNEY
Florida Bar Number: 113844
11200 NW 20th Street, Suite 101
Miami, Florida 33172
Tel. 305-715-7648
Email: Kevin.Gerarde@usdoj.gov

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the Southern District of Florida

FILED BY SM D.C.

Jun 19, 2025

ANGELA E. NOBLE CLERK U.S. DIST. CT. S. D. OF FLA. - FTL

United States of America)
v.)
DESHAWN BREEDLOVE,)

Case No. 25-mj-6411-PAB

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

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 18, 2025 in the county of Broward in the Southern District of Florida, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 841(a)(1)

Distribution of a Controlled Substance

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

Handwritten signature of Adrian Halley

Complainant's signature

Adrian Halley, Special Agent, ATF

Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by

Date: June 19, 2025

Handwritten signature of Judge Panayotta Augustin-Birch

Judge's signature

City and state: Fort Lauderdale, Florida

Hon. Panayotta Augustin-Birch, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Adrian Halley, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) and have been so since February 2008. I have received training and participated in investigations related to firearms, narcotics, violent crimes, drug, and violent crime street organizations. I am currently assigned to the ATF High Intensity Drug Trafficking Area Task Force. Accordingly, I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by law to conduct investigations and make arrests for offenses enumerated in Title 18 and Title 21 of the United States Code.

2. The information contained in this Affidavit is submitted for the limited purpose of establishing probable cause to obtain a criminal complaint charging Deshawn BREEDLOVE (“BREEDLOVE”) with knowingly and intentionally distributing a controlled substance, that is, 40 grams or more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi), which occurred on or about June 18, 2025.

3. The statements contained in this Affidavit are based on my personal knowledge, as well as information relayed to me by other law enforcement officials in this investigation. I have not included in this Affidavit each and every fact known to me. Rather, I have included only the facts that I believe are necessary to establish probable cause for the issuance of a criminal complaint against BREEDLOVE for the above-described criminal violations.

PROBABLE CAUSE

4. On June 18, 2025, a Federal arrest warrant was issued for co-conspirator Kyle Memnon (“Memnon”), based on his distribution of a controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

5. On June 18, 2025, law enforcement sought to arrest Memnon used two confidential informants (“CI#1” and “CI#2”), to arrange for the purchase of narcotics, and subsequent arrest, of Memnon. CI#1 and CI#2 are cooperating with law enforcement for financial benefits. They have each been cooperating for several years and have proven to be reliable confidential informants in previous investigations.

June 18, 2025, Undercover Purchase of Heroin and Subsequent Arrest of BREEDLOVE and Memnon

6. On June 18, 2025, CI #2 arranged for the purchase of heroin from BREEDLOVE through a series of telephone contacts with Memnon, using Memnon’s known phone number of (754) 284-9613. Memnon and CI#2 agreed that the transaction would take place at GC Pawn #3 – Gold N Connection, located at 4860 South State Road 7 in Hollywood, FL, in the Southern District of Florida. The parties agreed that CI #2 along with an undercover agent (“UC”) would meet with Memnon and BREEDLOVE at this location to purchase two and a half (2.5) ounces of heroin.

7. While conducting surveillance prior to the transaction, law enforcement identified BREEDLOVE walking on foot in front of GC Pawn #3 – Gold N Connection. Shortly thereafter, the UC, accompanied by CI #1 and CI #2, arrived at the purchase location operating a UC vehicle.

8. BREEDLOVE entered the rear driver’s seat of the UC vehicle and engaged in conversation with UC. Once inside the UC vehicle, BREEDLOVE produced a clear plastic bag containing the 2.5 ounces of heroin as ordered by CI #2. BREEDLOVE handed the bag to UC

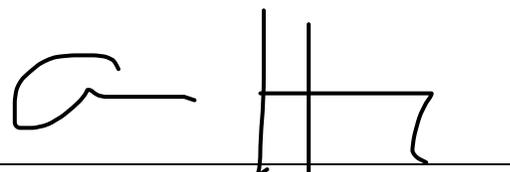
who inspected the heroin and questioned BREEDLOVE as to the purchase price of the heroin. BREEDLOVE stated the purchase price was \$70 U.S. currency per gram. UC and CI #2 explained the purchase price was high. BREEDLOVE stated he needed to charge \$70 US currency per gram because he wasn't making that much money on the resale of the heroin. The UC negotiated the purchase price of the heroin to \$67 U.S. currency per gram and began to pay BREEDLOVE for the purchase of the heroin. As BREEDLOVE counted the money, law enforcement approached and arrested BREEDLOVE. Additionally, during the transaction law enforcement observed Memnon nearby and arrested him as well.

9. Law enforcement weighed the drugs and conducted a field test. The drugs weighed approximately 78 grams and gave a positive result for heroin. Further drug analysis is pending.

CONCLUSION

10. Based on the above facts, I respectfully submit that there is probable cause to believe that BREEDLOVE did knowingly and intentionally distribute a controlled substance on or about June 18, 2025, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER YOUR AFFIANT SAYETH NAUGHT.



Adrian Halley, Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Attested to by the applicant in accordance
with the requirements of Fed. R. Crim. P. 4.1
on this 19 day of June 2025,
at Fort Lauderdale, Florida.



THE HONORABLE PANAYOTTA AUGUSTIN-BIRCH
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF FLORIDA