

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-mj-6406-PAB

UNITED STATES OF AMERICA,

v.

KYLE MEMNON and
LOUDSON LOUIS,

Defendants.

_____ /

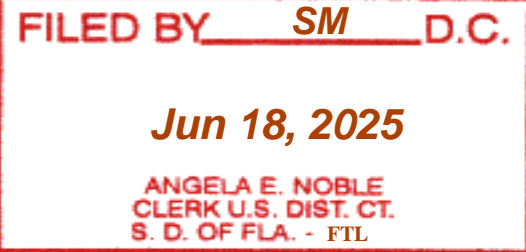
CRIMINAL COVER SHEET

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
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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

FILED BY SM D.C.

Jun 18, 2025

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

United States of America

v.

KYLE MEMNON and
LOUDSON LOUIS,

Case No. 25-mj-6406-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 May 27, 2025 - June 4, 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 (Memnon and Louis)

21 U.S.C. § 841(a)(1)

Distribution of a Controlled Substance (Memnon and Louis)

21 U.S.C. § 841(a)(1)

Distribution of a Controlled Substance (Memnon)

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.



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 Face Time

Date: June 18, 2025



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 Kyle MEMNON (“MEMNON”) and Loudson LOUIS (“LOUIS”) with the following controlled substance distribution violations: (1) charging MEMNON and LOUIS with knowingly and intentionally distributing a controlled substance, that is, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi), and Title 18, United States Code, Section 2, which occurred on or about May 27, 2025; (2) charging MEMNON and LOUIS with knowingly and intentionally distributing a controlled substance, that is, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi), and Title 18, United States Code, Section 2, which occurred on or about May 28, 2025; and (3) charging MEMNON with knowingly and intentionally distributing a controlled

substance, that is, 100 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)(i), which occurred on or about June 4, 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 MEMNON and LOUIS for the above-described criminal violations.

PROBABLE CAUSE

4. In April of 2025, ATF special agent was contacted by a confidential informant (“CI#1”), who stated they had previously met an individual, later identified as MEMNON, who was involved in criminal activity, specifically selling narcotics and firearms.

5. On May 15, 2025, Drug Enforcement Administration (“DEA”) special agents assisted ATF in the identification of MEMNON through an unrelated, separate investigation. Law enforcement used CI#1 and a second confidential informant (“CI#2”) to arrange for the purchase of narcotics through telephone communications with MEMNON at phone number (754)284-9613. It should be noted, the CIs are cooperating with law enforcement for financial benefits. They have each been cooperating with law enforcement for several years and have proven to be reliable confidential informants in previous investigations.

May 27, 2025, Undercover Purchase of Fentanyl from LOUIS,
Arranged by MEMNON

6. On May 27, 2025, CI #1 arranged for the purchase of heroin¹ from LOUIS through a series of telephone contacts between CI #1 and MEMNON, utilizing MEMNON's known phone number of (754) 284-9613. MEMNON and CI#1 agreed that the transaction would take place at the 5000 Block of Funston Street in Hollywood, FL, in the Southern District of Florida. The parties agreed that CI #2 along with an undercover agent ("UC #1") would meet with LOUIS at this location to purchase two (2) ounces of heroin.

7. LOUIS arrived at the meet location driving a white 2023 Nissan Altima, bearing Florida license plate DS63DS, which vehicle was registered to Memnon Venture LLC in Miramar, Florida. Law enforcement believes MEMNON to be affiliated with Memnon Venture LLC.

8. At the meet location, LOUIS entered the undercover vehicle with UC #1 and CI #2 inside. LOUIS handed UC #1 a bag containing two ounces of suspected heroin. UC #1 handed LOUIS \$3,100 in exchange for the suspected heroin. LOUIS asked UC#1 and CI#2 if they were interested in "switches," which law enforcement believes to be a reference to machinegun conversion devices. LOUIS also expressed his willingness to sell firearms and other controlled substances.

9. At the conclusion of the transaction, LOUIS exited the undercover vehicle, re-entered the white Nissan Altima, and left the area. UC #1 and CI #2 also left the area. The purchased substance was transported to a secure law enforcement facility and weighed approximately 57 grams. The purchased substance was field tested, yielding a positive result for

¹ As described below, the drugs law enforcement purchased on this date tested positive for fentanyl.

fentanyl, rather than heroin. The purchased substance was sent to the Drug Enforcement Administration (“DEA”) lab for further analysis.

10. Later on after this transaction, CI #1 and CI #2 met with LOUIS. While they were together, LOUIS received a telephone call from MEMNON. After the call concluded, LOUIS explained to CI#1 and CI#2 that he undercharged UC#1 for the two (2) ounces of heroin that tested positive for fentanyl. After this, MEMNON called CI#1 to say that LOUIS undercharged UC#1 for the sale. CI#1 handed the phone to CI#2, and MEMNON repeated that LOUIS undercharged UC#1, and that UC#1 would need to pay an additional \$1,400 U.S. currency for the two (2) ounces.

May 28, 2025, Undercover Purchase of Fentanyl from LOUIS,
Arranged by MEMNON

11. On May 28, 2025, CI #1 arranged for the purchase of three (3) ounces of heroin² from LOUIS through a series of telephone contacts between CI #1 and MEMNON, utilizing MEMNON’s known phone number of (754) 284-9613.

12. Once the transaction was arranged, UC #1 and CI #2 traveled to the 5000 Block of Funston Street, Hollywood, Florida, located in the Southern District of Florida, to meet with LOUIS. LOUIS arrived at the meet location in the same white 2023 Nissan Altima, bearing FL registration DS63DS, which LOUIS drove to the deal on May 27, 2025.

13. LOUIS entered the undercover vehicle and immediately brought up the fact that he was underpaid during the previous drug sale on May 27, 2025. LOUIS then produced a small brown cardboard box, which contained suspected heroin, and provided the box to UC #1.

14. UC #1 paid LOUIS \$1,400 in US currency, which was owed to LOUIS from the previous day. LOUIS counted the money and secured it on his person.

² As described below, the drugs law enforcement purchased on this date tested positive for fentanyl.

15. UC #1 asked LOUIS how much the three (3) ounces of heroin would cost. LOUIS told UC#1 they would cost \$6,300 U.S. currency. UC#1 paid this amount to LOUIS, who again counted the money and secured it on his person.

16. LOUIS exited the undercover vehicle, returned to the Nissan Altima, and left the area. UC #1 and CI #2 departed the area. The purchased drugs were transported to a secure law enforcement facility and determined to weigh approximately eighty-four (84) grams. The purchased substance was field tested gave a positive result for the presence of fentanyl. The purchased substance was sent to the DEA lab for further analysis.

June 4, 2025, Undercover Purchase of Heroin from MEMNON

17. On June 4, 2025, CI #2 arranged for the purchase of four (4) ounces of heroin from MEMNON through a series of telephone contacts between CI #2 and MEMNON, utilizing MEMNON's known phone number of number (754)284-9613.

18. Once the transaction was arranged, UC #1, CI #2, and a second undercover agent ("UC #2") responded to the 5000 Block of Funston Street, Hollywood, Florida, located in the Southern District of Florida, to meet with MEMNON. While waiting for MEMNON to arrive, CI #2 had telephonic contact with MEMNON. MEMNON indicated to CI #2 that he was approximately 2 minutes away.

19. A short time later, MEMNON arrived at the meet location. MEMNON was the only occupant of the vehicle. MEMNON was wearing a black mask, which covered a portion of MEMNON's face. UC #1 entered the vehicle MEMNON was driving, at which time MEMNON handed UC #1 a bag containing purported heroin. UC #1 inquired about the amount of heroin in the bag. MEMNON confirmed the amount was four (4) ounces of heroin. UC #1 paid MEMNON

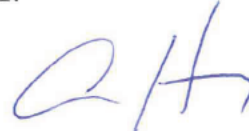
\$8,100 U.S. currency for the four (4) ounces of heroin. After the transaction was done, MEMNON left the area.

20. Law enforcement weighed the drugs and conducted a field test. The drugs weighed approximately 119 grams and gave a positive result for heroin. The drugs were sent to the DEA lab for further analysis.

CONCLUSION

21. Based on the above facts, I respectfully submit that there is probable cause to believe that MEMNON and LOUIS did knowingly and intentionally distribute a controlled substance on or about May 27 and May 28, 2025, in violation of Title 21, United States Code, Section 841(a)(1), and that MEMNON did knowingly and intentionally distribute a controlled substance on or about June 4, 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 by Face Time on this **18** day of June 2025,
at Fort Lauderdale, Florida.



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