

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
25-CR-60139-DAMIAN/VALLE
CASE NO. _____

21 U.S.C. § 841(a)(1)

21 U.S.C. § 853

UNITED STATES OF AMERICA

v.

SHANE WORTHY,

Defendant.

FILED BY BM D.C.

Jun 10, 2025

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

INDICTMENT

The Grand Jury charges that:

COUNT 1

Distribution of a Controlled Substance
(21 U.S.C. § 841(a)(1))

On or about April 30, 2025, in Broward County, in the Southern District of Florida, the defendant,

SHANE WORTHY,

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is fentanyl, a Schedule II controlled substance.

COUNT 2
Distribution of a Controlled Substance
(21 U.S.C. § 841(a)(1))

On or about May 1, 2025, in Broward County, in the Southern District of Florida, the defendant,

SHANE WORTHY,

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide, that is fentanyl, a Schedule II controlled substance.

COUNT 3
Distribution of a Controlled Substance
(21 U.S.C. § 841(a)(1))

On or about May 9, 2025, in Broward County, in the Southern District of Florida, the defendant,

SHANE WORTHY,

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide, that is fentanyl, a Schedule II controlled substance.

COUNT 4
Distribution of a Controlled Substance
(21 U.S.C. § 841(a)(1))

On or about May 13, 2025, in Broward County, in the Southern District of Florida, the defendant,

SHANE WORTHY,

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that this violation involved forty (40) grams or more of a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is fentanyl, a Schedule II controlled substance.

COUNT 5
Distribution of a Controlled Substance
(21 U.S.C. § 841(a)(1))

On or about May ^{20 KS}19, 2025, in Broward County, in the Southern District of Florida, the defendant,

SHANE WORTHY,

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that this violation involved forty (40) grams or more of a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is fentanyl, a Schedule II controlled substance.

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America certain property in which the defendant, **SHANE WORTHY**, has an interest.

2. Upon a conviction of Title 21, United States Code, Section 841, as alleged in this Indictment, the defendant shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense, pursuant to Title 21, United States Code, Section 853.

All pursuant to Title 18, United States Code, Section 853.

A TRUE BILL

FOREPERSON



HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY



KSENIYA SMYCHKOUSKAYA
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.: 25-CR-60139-DAMIAN/VALLE

v.

SHANE WORTHY,

CERTIFICATE OF TRIAL ATTORNEY

Defendant.

Court Division (select one)

- ☐ Miami ☐ Key West ☐ FTP
☒ FTL ☐ WPB

Superseding Case Information:

New Defendant(s) (Yes or No) _____

Number of New Defendants _____

Total number of new counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the Indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No
List language and/or dialect: _____
4. This case will take 2 days for the parties to try.
5. Please check appropriate category and type of offense listed below:
 (Check only one) (Check only one)
 I ☒ 0 to 5 days ☐ Petty
 II ☐ 6 to 10 days ☐ Minor
 III ☐ 11 to 20 days ☐ Misdemeanor
 IV ☐ 21 to 60 days ☒ Felony
 V ☐ 61 days and over
6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
7. Has a complaint been filed in this matter? (Yes or No) Yes
If yes, Judge Patrick M. Hunt Magistrate Case No. 25-mj-6350
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of May 29, 2025
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? (Yes or No) No
14. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
15. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
16. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

By: _____

Kseniya Smychkouskaya
 Assistant United States Attorney
 FL Bar No. 0112744

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: SHANE WORTHY

Case No: _____

Counts # 1-3:

Distribution of a Controlled Substance

Title 21, United States Code, Section 841(a)(1)

- * **Max. Term of Imprisonment: 30 years**
- * **Mandatory Min. Term of Imprisonment (if applicable): N/A**
- * **Max. Supervised Release: At least 3 Years to Life**
- * **Max. Fine: \$ 1,000,000**

Counts # 4-5:

Distribution of a Controlled Substance

Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)

- * **Max. Term of Imprisonment: 40 years**
- * **Mandatory Min. Term of Imprisonment (if applicable): 5 years**
- * **Max. Supervised Release: At least 4 years to Life**
- * **Max. Fine: \$5,000,000**

***Refers only to possible term of incarceration and fines, does not include possible restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-MJ-6350-PMH

UNITED STATES OF AMERICA

v.

IN RE SEALED COMPLAINT,

Defendant.

_____ /

FILED BY R.P.B. D.C.

May 28, 2025

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

CRIMINAL COVER SHEET

1. 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
2. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
3. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
4. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: /s/Kseniya Smychkouskaya
Kseniya Smychkouskaya
Assistant United States Attorney
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UNITED STATES DISTRICT COURT

for the
Southern District of FloridaFILED BY R.P.B. D.C.

May 28, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTLUnited States of America
v.

SHANE WORTHY,

Case No. 25-MJ-6350-PMH

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 April 30, 2025 - May 20, 2025 in the county of Broward in the
Southern District of Florida and elsewhere, the defendant(s) violated:

Code Section

Title 21, United States Code,
Section 841(a)(1)

Offense Description

Distribution of a Controlled Substance

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.

Complainant's signature

Kirsten F. Ellerbusch, S/A, ATF

Printed name and title

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

FaceTime

Date: 5/28/2025

Judge's signature

City and state: Fort Lauderdale, Florida

Hon. Patrick M. Hunt, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF FEDERAL COMPLAINT

I, Kirsten F. Ellerbusch, having been duly sworn, depose and state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I have been employed as a Special Agent since October 2018. I am currently assigned to the Kansas City Field Division, in Saint Louis, Missouri, where I am tasked with investigating narcotics trafficking, violent crimes involving firearms, and related offenses. Prior to my employment with ATF, I served as a Detective with the Creve Coeur Police Department in Saint Louis, Missouri. 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 Shane Worthy (“WORTHY”) with distribution of a controlled substance, that is, fentanyl, in violation of Title 21, United States Code, Section 841(a)(1).

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 WORTHY for the above-described criminal violation.

PROBABLE CAUSE

4. In April 2025, ATF received information from the Broward County Sheriff’s Office (“BSO”) that WORTHY was distributing fentanyl in the Pompano Beach area, in the Southern

District of Florida. BSO provided ATF with a phone number 786-xxx-4970 (“TN-4970”), which according to the law enforcement investigation, WORTHY was using to distribute fentanyl. BSO also provided ATF with WORTHY’s photographs obtained as a result of the law enforcement investigation.

First Controlled Purchase

5. As part of an ATF undercover operation, WORTHY was provided with the phone number of an undercover officer (“UC 1”), as a potential buyer for narcotics. On April 30, 2025, WORTHY called the UC 1 from TN-4970 and informed the UC 1 that he had fentanyl for sale. During a recorded phone call, the UC 1 negotiated a purchase of suspected fentanyl from WORTHY and agreed to meet with him near West Atlantic Boulevard, in Pompano Beach, Florida.

6. The UC was provided with pre-recorded ATF Agent Cashier Funds (“ATF ACF”) to purchase narcotics and was equipped with a recording and transmitting equipment. The UC 1 and another undercover officer (“UC 2”) responded to the predetermined location in Pompano Beach, Florida, in an ATF undercover vehicle (“UCV”). The UC 1 called WORTHY and advised him that they were at the location. A few moments later, WORTHY entered the UCV using the rear passenger door. The UC 1 provided WORTHY with \$60.00 in ATF ACF in exchange for three (3) small pebble-like pieces of suspected fentanyl. WORTHY stated he had more narcotics and could obtain them and come back. WORTHY then exited the UCV and walked north through a parking lot to the area of a residence located at 2795 Northwest 1st Court, Pompano Beach, Florida. A few minutes later, law enforcement surveillance units observed WORTHY come back from that area and walk back to the UCV.

7. WORTHY entered the UCV and provided the UC 1 and UC 2 with approximately 1.4 grams of suspected fentanyl. The UC 1 paid an additional \$100.00 in ATF ACF for the fentanyl.

8. ATF impounded the suspected narcotics and transported them to the ATF office, where the suspected narcotics were weighed and field tested. The field test was positive for the presence of fentanyl. The narcotics weighed approximately 1.4 grams. The narcotics were submitted to the Drug Enforcement Administration (“DEA”) laboratory for chemical analysis. The DEA laboratory results are currently pending.

Second Controlled Purchase

9. On May 1, 2025, ATF conducted another controlled purchase of approximately 1.5 grams of fentanyl from WORTHY. On that date, the UC 1 and WORTHY agreed to meet near a fast-food chain restaurant on West Atlantic Boulevard, in Pompano Beach, Florida. The UC 1 was provided with ATF ACF for the purchase of narcotics and was equipped with a recording and transmitting equipment.

10. The UC 1 arrived at the predetermined location in UCV and called WORTHY. After arriving by foot, WORTHY entered the front passenger side of the UCV. While in the UCV, the UC 1 purchased approximately 1.5 grams of suspected fentanyl from WORTHY in exchange for \$160.00 in ATF ACF. WORTHY told the UC 1 that he had additional fentanyl for sale and agreed to sell (14) grams of fentanyl. WORTHY then got out of the UCV. Law enforcement surveillance units followed WORTHY and observed him walking around a business complex on West Atlantic Boulevard, in Pompano Beach, Florida, conversing on a cellular phone. Law enforcement surveillance units also observed a female who appeared to be conversing on a cellular phone in front of a residence located at 2795 Northwest 1st Court, Pompano Beach, Florida.

11. Shortly after being observed by law enforcement on his cellular phone, WORTHY came back to the UCV and told the UC 1 that his source could bring fourteen (14) grams of fentanyl. WORTHY then went back home to charge his cellular phone. WORTHY exited the UCV. WORTHY was then observed entering the residence located at 2795 Northwest 1st Court, Pompano Beach, Florida.

12. After exchanging multiple calls with WORTHY, the UC 1 was unable to purchase additional fentanyl on May 1, 2025.

13. After the controlled transaction, ATF impounded the narcotics and transported them to the ATF office, where the narcotics were weighed and field tested. The field test was positive for the presence of fentanyl. The narcotics weighed approximately 1.5 grams. The narcotics were submitted to the DEA laboratory for chemical analysis. The DEA laboratory results are currently pending.

Third Controlled Purchase

14. On May 5, 2025, ATF conducted another controlled purchase of approximately fourteen (14) grams of suspected fentanyl from WORTHY. On that date, the UC 1 and WORTHY agreed to meet near a liquor store on West Atlantic Boulevard, in Pompano Beach, Florida. The UC 1 and UC 2 were provided with ATF ACF for the purchase of narcotics and were equipped with a recording and transmitting equipment.

15. The UC 1 and UC 2 responded to the predetermined location and called WORTHY. WORTHY arrived at the location and explained that his source was on his way with fentanyl. Using a speakerphone, WORTHY then made a phone call to what appeared to be his source, who confirmed that he was on his way. WORTHY told the UC 1 that his source was his partner. WORTHY then exited the UCV and departed from the meet location.

16. Once WORTHY was ready for the narcotics transaction, he called the UC 1. The UC 1 and UC 2 met with WORTHY at the predetermined location. The UC 1 provided WORTHY with \$900.00 in ATF ACF in exchange for approximately fourteen (14) grams of suspected fentanyl. WORTHY then exited the UCV and walked away toward the Northwest 28th Avenue, in Pompano Beach, Florida.

17. ATF impounded the suspected narcotics and transported them to the ATF office, where the suspected narcotics were weighed and field tested. The field test was inconclusive. The substance weighed approximately fourteen (14) grams. The suspected fentanyl was sent to the DEA laboratory for chemical analysis. The DEA laboratory results are currently pending.

Fourth Controlled Purchase

18. On May 9, 2025, ATF conducted another controlled purchase of approximately twenty-eight (28) grams of suspected fentanyl from WORTHY. On that date, the UC 1 and WORTHY agreed to meet near West Atlantic Boulevard, in Pompano Beach, Florida. The UC 1 was provided with ATF ACF for the purchase of narcotics and was equipped with a recording and transmitting equipment.

19. The UC 1 met WORTHY at the predetermined location. After arriving on a bicycle, WORTHY entered the UCV using the front passenger door. The UC 1 then provided WORTHY with \$1,800 in ATF ACF in exchange for approximately twenty-eight (28) grams of suspected fentanyl. WORTHY then exited the UCV and walked back to the residence located at 2795 Northwest 1st Court, Pompano Beach, Florida.

20. ATF impounded the suspected narcotics and transported them to the ATF office, where the suspected narcotics were weighed and field tested. The field test was positive for the presence of fentanyl. The narcotics weighed approximately twenty-eight (28) grams. The narcotics

were submitted to the DEA laboratory for chemical analysis. The DEA laboratory results are currently pending.

Fifth Controlled Purchase

21. On May 13, 2025, ATF conducted another controlled purchase of approximately forty-nine (49) grams of suspected fentanyl from WORTHY. On that date, the UC 1 and WORTHY agreed to meet near West Atlantic Boulevard, in Pompano Beach, Florida. The UC 1 was provided with ATF ACF for the purchase of narcotics and was equipped with a recording and transmitting equipment.

22. The UC 1 met WORTHY at the predetermined location. After arriving on a bicycle, WORTHY entered the UCV using the rear passenger door. The UC 1 then provided WORTHY with \$900.00 in ATF ACF in exchange for approximately fifteen (15) grams of suspected fentanyl. WORTHY then stated that he had additional fentanyl and was meeting his source shortly. WORTHY then exited the UCV.

23. Less than an hour after exiting the UCV, WORTHY arrived at the predetermined location on West Atlantic Boulevard, in Pompano Beach, in a vehicle. WORTHY entered the UCV using the rear passenger door. The UC 1 provided WORTHY with \$1,500.00 in ATF ACF in exchange for approximately thirty-four (34) grams of suspected fentanyl. WORTHY then exited the UCV.

24. ATF impounded the suspected narcotics and transported them to the ATF office, where the suspected narcotics were weighed and field tested. The field test was positive for the presence of fentanyl. The narcotics weighed approximately forty-nine (49) grams. The narcotics were submitted to the DEA laboratory for chemical analysis. The DEA laboratory results are currently pending.

Sixth Controlled Purchase

25. On May 19, 2025, after a series of recorded phone calls and text messages with WORTHY, the UC 1 arranged another controlled purchase of approximately one hundred eighteen (118) grams of suspected fentanyl, to take place on May 20, 2025.

26. On May 20, 2025, the UC 1 was provided with ATF ACF for the purchase of fentanyl and was equipped with a recording and transmitting equipment. The UC 1 met WORTHY at a predetermined location on West Atlantic Boulevard, in Pompano Beach, Florida. WORTHY arrived at that location in a vehicle. He then entered the UCV using the rear passenger door and provided the UC 1 and UC 2 with suspected fentanyl. Approximately one (1) ounce of suspected fentanyl was white and chunky, and approximately three (3) ounces were green and packaged in a vacuum sealed bag, which is, in my training and experience, indicative of narcotics coming from two different sources of supply. The UC 1 provided WORTHY with \$7,200.00 in ATF ACF in exchange for approximately one hundred eighteen (118) grams of suspected fentanyl and an additional \$100.00 in ATF ACF as a brokerage fee.

27. ATF impounded the suspected narcotics and transported them to the ATF office, where they were weighed and field tested. The field test was positive for the presence of fentanyl. The substance weighed approximately one hundred eighteen (118) grams. The substance was sent to the DEA laboratory for chemical analysis. The DEA laboratory results are currently pending.

28. The approximate total of all six controlled purchases of suspected and field-tested fentanyl from WORTHY to law enforcement was two hundred eleven grams and nine milligrams, which is 211.09 grams.

CONCLUSION

29. Based on the above facts, I respectfully submit that there is probable cause to believe that Shane WORTHY did distribute a controlled substance, that is, fentanyl, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER AFFIANT SAYETH NAUGHT



SPECIAL AGENT KIRSTEN F. ELLERBUSCH
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 Facetime this 28th day of May, 2025.



HONORABLE PATRICK M. HUNT
UNITED STATES MAGISTRATE JUDGE