

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-MJ-03196-ELFENBEIN

IN RE SEALED COMPLAINT
_____ /

CRIMINAL COVER SHEET

FILED BY ER D.C.

Jun 16, 2025

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

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/ Elena Smukler

Elena Smukler
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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

MARQUS WASHINGTON,
CHAVON GRANT, and
JOSEPH KADIRI, JR.*Defendant(s)*

Case No. 25-MJ-03196-ELFENBEIN

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 21, 2025 - June 16, 2025 in the counties of Miami-Dade and Broward in the
Southern District of Florida, the defendant(s) violated:*Code Section**Offense Description*

21 U.S.C. § 841(a)(1)

21 U.S.C. § 922(g)

18 U.S.C. § 924(c)

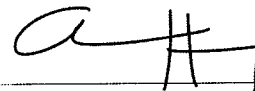
Distribution of a Controlled Substance (Washington Only)

Possession of a Firearm and Ammunition by a Convicted Felon

Carrying a Firearm in Furtherance of a Drug Trafficking Crime
(Washington Only)

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.
Complainant's signature

Bade No. 4973

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 TimeDate: June 16, 2025
*Judge's signature*City and state: Miami, Florida

Honorable Marty Fulgueira Elfenbein, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF AN 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. I have personally been involved in numerous investigations concerning violations of federal firearms and drug laws. I have attended multiple courses on conducting criminal investigations and have authored multiple electronic search warrants and complaints during my time with the ATF.

2. I submit this Affidavit in support of a criminal complaint charging **Marqus Washington ("WASHINGTON")** with violations of Title 21, United States Code, Section 841(a)(1) (distribution of a controlled substance), and Title 18, United States Code, Sections 922(g)(1) (Felon in possession of a firearm) and 924(c) (carrying a firearm in furtherance of a drug trafficking crime). This affidavit is also submitted in support of a criminal complaint charging **Chavon Grant ("GRANT")** and **Joseph Kadiri, Jr. ("KADIRI")**, with a violation of Title 18, United States Code, Section 922(g)(1) (Felon in possession of a firearm).

3. This Affidavit is based on my personal investigation and investigation by others, including federal and local law enforcement officials whom I know to be reliable and trustworthy. The facts and information contained in this Affidavit are based on my personal knowledge and observation, as well as information received in my official capacity from other individuals, including other law enforcement officers involved in this investigation, as well as my review of records, documents, and other physical items obtained during the course of this investigation. This

Affidavit does not include every fact known to me about this investigation, but rather only those facts sufficient to establish probable cause.

PROBABLE CAUSE

Background Investigation

4. In May 2025, ATF received information from a confidential informant that Chevron Grant (hereinafter, "GRANT") was involved in various types of criminal activity, including narcotics trafficking and firearms offenses within Broward and Miami-Dade Counties, within the Southern District of Florida. GRANT was thereafter introduced to an ATF undercover agent ("UC") through a confidential informant ("CI").

5. GRANT initially coordinated the sale of narcotics to an ATF UC and CI through another individual, Marqus Washington ("WASHINGTON"). GRANT introduced the CI to WASHINGTON via Facetime to coordinate the initial purchase.

6. A review of GRANT's criminal history shows the following felony convictions in Broward County, Florida: (a) burglary unoccupied dwelling, in violation of Florida Statute 810.23(b) in Case No. 11-001475-CF10A, (b) grand theft motor vehicle, in violation of Florida Statute 812.14(1)(A), in Case No. 15-013032-CF10A. Based on the amount of time that GRANT served on one or more of the aforementioned felonies, GRANT knew he was a convicted felon.

7. A review of WASHINGTON's criminal history shows the following felony convictions in Broward County, Florida: (1) A conviction on November 7, 2008, for delivery of cocaine, in violation of Florida statute § 893.13(1)(A)(1); (2) a conviction on April 29, 2014, for three counts of selling or delivering cannabis at or near a state, county, or municipal park, in violation of Florida statutes §§ 893.13(1)(C)(2) and 893.03(1)(C)(4); (3) a conviction on April 29, 2014, for possession of cannabis with intent to deliver at or near a public park, in violation of Florida

statutes §§ 893.13(1)(c)(2) and 893.03(1)(c)(7); and, (4) a conviction on April 29, 2014, for aggravated battery on a pregnant female, in violation of Florida statute § 784.045(1)(b). Based on the amount of time that WASHINGTON served on one or more of the aforementioned felonies, WASHINGTON knew he was a convicted felon.

***May 21, 2025 – Controlled Purchase of Narcotics and a Firearm/Ammunition
(WASHINGTON and GRANT)***

8. On or about May 21, 2025, an ATF UC purchased twenty (20) suspected fentanyl pills and one (1) firearm with ammunition from WASHINGTON, for a total of \$1,500 in U.S. Currency at an undercover fixed location (hereinafter, a “UCFL”), located in Miami-Dade County, Florida.

9. On May 21, 2025, at approximately 1:46 p.m., the CI and WASHINGTON arrived at the UCFL. WASHINGTON exited the CI’s vehicle wearing a bag and proceeded to enter the UCFL, where he met with the UC.

10. The UC led WASHINGTON into the office area of the UCFL. The UC asked WASHINGTON what he had for him. WASHINGTON opened his bag and provided the UC with a baggie containing blue suspected fentanyl pills. The UC asked if there were twenty (20) pills; WASHINGTON confirmed that that was correct. The UC asked WASHINGTON about a gun that the UC expected WASHINGTON to have for sale. WASHINGTON said that he would have to go and get the firearm. WASHINGTON stated that he believed that he could obtain the firearm later that day. The UC asked WASHINGTON if the price for the twenty (20) pills was \$300.00; WASHINGTON confirmed that it was. The UC paid WASHINGTON \$300 in exchange for the suspected fentanyl pills. The UC asked WASHINGTON if he thought he could obtain the firearm in the next hour, WASHINGTON stated that he could.

11. At approximately 2:00 p.m., the CI and WASHINGTON departed the UCFL in the

CI's vehicle to go and retrieve the firearm. At approximately 3:58 p.m., the CI and WASHINGTON returned to the UCFL. WASHINGTON walked up to the UCFL carrying a blue suitcase and a pillow concealing something inside. UC met WASHINGTON and led him into the office in the UCFL. WASHINGTON removed the pillow and another item from the top of the suitcase and revealed a firearm. WASHINGTON, using a clothing item, removed the firearm from the suitcase and gave the firearm to the UC. WASHINGTON then retrieved a clear latex glove from the suitcase and placed it on the desk. The glove contained six (6) 12-gauge shotgun shells. WASHINGTON stated that his associate would take \$1,200 for the firearm. The UC stated that he would purchase the firearm for \$1,200. The UC counted the money and told WASHINGTON that he was upset with the price and that he was not going to make money when he resells the firearm.

12. The UC and WASHINGTON discussed future firearms and narcotics transactions. WASHINGTON stated that he could acquire more firearms and would make sure the price was fair. WASHINGTON also stated that he could acquire methamphetamine to sell to UC. Shortly thereafter, WASHINGTON departed the area.

13. The twenty (20) blue suspected fentanyl pills sold by WASHINGTON were field tested with a positive result for fentanyl.

14. The firearm purchased was a Mossberg, model 590S Shockwave, 12-gauge shotgun, bearing serial number V1597848, as well as six (6) rounds of 12-gauge shotgun ammunition. The firearm was reported stolen out of Norfolk, VA in July of 2022. The firearm and ammunition were manufactured out of the state of Florida.

15. On May 21, 2025, at approximately 5:03 p.m., GRANT and an unidentified female arrived at the UCFL as a passenger in the CI's vehicle. The CI, the unidentified female, and GRANT exited the CI's vehicle and entered the UCFL. GRANT was carrying a red backpack.

16. The UC led GRANT and the CI into the office area of the UCFL. The UC asked GRANT what he had for him. GRANT responded that he had an “AR P,” referring to an AR-style pistol. GRANT passed the backpack he came in with to the UC. The UC opened the backpack and began to inspect the AR-style pistol inside. GRANT stated that the firearm was his “baby.” The UC told GRANT that he trafficked firearms to Canada and made a large profit. The UC asked GRANT the price for the AR pistol; GRANT told the UC that it was \$1,800. The UC asked GRANT if he could lower the price; GRANT responded that he could not, and that he really did not wish to sell it. The UC told GRANT that he would pay that price only because it was their first deal together and he wished to continue to conduct business with GRANT in the future. GRANT stated that the price was also high because he added accessories to the firearm and again stated that the firearm was his “baby.” GRANT also produced two loaded high-capacity magazines—which included a total of forty-six (46) rounds of ammunition—from the red backpack and gave them to the UC. The UC gave GRANT \$1,800 for the firearm.

17. The firearm purchased from GRANT was a Palmetto State Armory, model PA-15, Multi Caliber pistol, bearing serial number SCD704182, with forty-six (46) rounds of assorted ammunition. The firearm and ammunition were manufactured outside of the state of Florida.

18. It should be noted, the aforementioned transactions involving both WASHINGTON and GRANT and were audio and video recorded.

May 27, 2025 - Controlled Purchase of Narcotics and a Firearm (WASHINGTON)

19. On or about May 27, 2025, the UC, along with another ATF undercover agent (collectively, the “UCs”) purchased approximately forty-two (42) suspected MDMA pills and one (1) firearm from WASHINGTON for \$2,000 at WASHINGTON’s residence, located at 1200 NW

Seventh Terrace, in Fort Lauderdale, Florida 33311 (hereinafter as" WASHINGTON's Residence").

20. On or about May 27, 2025, the UCs arrived at WASHINGTON's Residence. Upon arriving to WASHINGTON's Residence, the UCs observed WASHINGTON in the front yard under the carport area. The UCs exited their vehicle and walked towards the front of the WASHINGTON's Residence where they made contact with WASHINGTON.

21. WASHINGTON told the UC to have a seat and then grabbed a box and placed it in front of the UC. The UC observed a firearm inside the box and asked WASHINGTON if it was loaded; WASHINGTON stated that it was.¹ The UC confirmed the price of \$1,300 for the firearm and for narcotics. WASHINGTON then produced suspected MDMA pills and handed them to the UC.

22. The UC told WASHINGTON to let him know if he came across any other firearms. WASHINGTON then showed the UC a pistol in his waistband. The UC asked how much for the pistol; WASHINGTON told the UC that he had paid \$500 for it. The UC offered \$800 for the firearm, and WASHINGTON agreed.

23. The UC took the box with the original firearm and suspected MDMA pills back to the vehicle and retrieved \$800. When the UC returned to the carport area, WASHINGTON was gone. A short time later, WASHINGTON exited the residence with his firearm still in his waistband. WASHINGTON also had a bag of suspected narcotics in his hand. As the UC was counting the \$800, WASHINGTON stated that he needed the firearm for protection for a short time. The UC made several attempts to buy the firearm, but WASHINGTON told the UC he would sell it to him in the very near future.

¹ It should be noted that the firearm was not actually loaded with ammunition, however there were three (3) rounds of ammunition inside of the box with the firearm

24. Once the transaction and conversation were concluded, the UCs departed WASHINGTON's Residence.

25. The UCs were equipped with electronic recording/monitoring devices for the duration of the controlled purchase of narcotics and firearm.

26. The gross weight of the suspected MDMA and packaging was approximately fourteen (14) grams. The suspected MDMA was field tested with a positive result for amphetamines.

27. The firearm was identified as a ZASTAVA firearm, model PAP M92 PV, 7.62mm pistol, bearing serial number M92PV873164, and loaded with rounds of ammunition. The firearm and ammunition sold by WASHINGTON were manufactured outside of the state of Florida.

June 4, 2025 - Controlled Purchase of Narcotics and a Firearm (WASHINGTON)

28. On June 4, 2025, an ATF UC purchased approximately one hundred (100) suspected MDMA pills and one (1) firearm with a high-capacity magazine from WASHINGTON for a total of \$900.

29. On June 4, 2025, at approximately 4:41 p.m., WASHINGTON arrived at the ATF UCFL as a passenger in a Blue Kia. The UC met WASHINGTON and led WASHINGTON into the office area of the UCFL. WASHINGTON placed a bag containing the suspected MDMA pills on the desk. WASHINGTON informed the UC that there were one hundred (100) MDMA pills in the bag.

30. WASHINGTON then produced a firearm, which was wrapped in a black plastic bag and placed it on the desk for. The UC provided WASHINGTON with \$900 for the firearm and narcotics.

31. The gross weight of the one hundred (100) suspected MDMA pills in the packaging provided by WASHINGTON was approximately 34 grams. The suspected MDMA was field tested with a positive result for “meth/amphetamine.” The firearm sold by WASHINGTON was a Smith & Wesson, model 6590, 9mm pistol, bearing serial number RSR2385, with a high-capacity magazine. The firearm was manufactured outside of the state of Florida.

June 6, 2025 - Controlled Purchase of Narcotics and Firearms (WASHINGTON)

32. On June 6, 2025, two ATF UCs purchased two (2) firearms and seven (7) suspected MDMA pills for \$2,000 from WASHINGTON at WASHINGTON’s Residence.

33. Prior to June 6, 2025, the UC introduced additional ATF undercover agents to WASHINGTON. On June 6, 2025, the ATF undercover agents arrived at WASHINGTON’s Residence. Several minutes later, WASHINGTON exited the Residence with two minor children. The undercover agents exited their vehicle and approached WASHINGTON.

34. The undercover agents greeted WASHINGTON. They observed WASHINGTON had a pistol with a large capacity magazine in his front right pocket. WASHINGTON removed another pistol, a Ruger pistol which was in a holster, from a separate pocket and handed it to the undercover agents. One of the undercover agents confirmed with WASHINGTON that the price of the Ruger pistol was \$900. One of the undercover agents asked WASHINGTON about the pistol with the large capacity magazine that he had in his pocket and if he was willing to sell the firearm. WASHINGTON stated the pistol was his and that he was not willing to sell it. WASHINGTON stated that he was supposed to get an “AR pistol grip .223” for UC #1 the following day. WASHINGTON removed the pistol from his pocket to show the undercover agents and then put the pistol back in his pocket. Referring to the pistol, WASHINGTON stated, “You know I gotta keep me something bro.” One of the undercover agents handed WASHINGTON \$900 to complete

the transaction for the Ruger pistol. WASHINGTON reiterated that he had previously agreed to sell a “.223 pistol grip” and stated he was selling it for \$1,290.

35. WASHINGTON stated he was going to get his cell phone inside of his Residence. Several minutes later, WASHINGTON exited the Residence and handed one of the undercover agents another firearm, a Smith & Wesson pistol, and stated, “I got this one right here.” One of the undercover agents examined the firearm and asked WASHINGTON for the price of the firearm and handed the firearm to the other undercover agent. WASHINGTON responded to give him the same amount as the other firearm (\$900). The undercover agent handed WASHINGTON \$900 to complete the transaction for the Smith & Wesson pistol.

36. WASHINGTON re-entered the Residence. WASHINGTON then exited the front door of the residence and stated that he only had seven (7) pills. WASHINGTON handed one of the undercover agents a small plastic zip lock bag containing seven (7) suspected MDMA pills. WASHINGTON still had the pistol with the large capacity magazine in his front right pocket while conducting the narcotics transaction. The agreed upon price was \$175 for the pills; however, the undercover agents did not have change. One of the undercover agents handed WASHINGTON \$200 to complete the transaction for the suspected MDMA pills.

37. The firearms purchased were identified as a Smith & Wesson firearm, model CSX, 9mm caliber pistol, bearing serial number SEB0809, and a Ruger firearm, Model LCP, .380 caliber pistol, bearing serial number 372341991. A query of the National Crime Information Center (NCIC) revealed that the Ruger pistol had previously been reported stolen to the Orangeburg County Sheriff's Office in South Carolina on or about September 6, 2020. The firearms were manufactured outside of the state of Florida.

38. The gross weight of the suspected MDMA and packaging was approximately five

(5) grams. The suspected MDMA was field tested and tested positive for the presence of MDMA.

June 12, 2025 - Controlled Purchase of Firearms (WASHINGTON and KADIRI)

39. On June 12, 2025, two ATF undercover agents (the "UCs") purchased three (3) firearms from WASHINGTON and a person later identified as Joseph KADIRI ("KADIRI"), at an apartment building located at 2501 NW 56th Avenue, Lauderhill, Florida ("KADIRI's Residence").

40. At approximately 12:31 p.m. surveillance was initiated in the area of KADIRI's Residence. Prior to the UCs arrival, KADIRI was seen idling in front of the building. At approximately 12:41 p.m. the UCs called and informed WASHINGTON that they were in the area. At approximately 12:45 p.m., the UCs drove to KADIRI's Residence and parked on the south side of the building. At approximately 12:47 p.m., the UCs observed KADIRI outside the door of an apartment located on the south side of the building. KADIRI appeared to be on his cell phone while looking at the UC vehicle.

41. At approximately 12:49 p.m., WASHINGTON arrived in a blue Kia and parked on the passenger side of the UC vehicle. WASHINGTON exited the driver's seat of the Kia carrying a black and silver case. The UCs followed WASHINGTON to a black Nissan Altima that was parked on the driver's side of the Kia. Law enforcement later confirmed that the Nissan Altima was registered to KADIRI. WASHINGTON entered the front passenger seat of the Nissan. The UCs stood outside the front passenger door of the Nissan.

42. WASHINGTON opened a black duffel bag that was in the Nissan and showed the UCs that it contained two (2) firearms, a pistol and an AR-style pistol. WASHINGTON then opened the case he had carried to the Nissan and showed the UCs that it contained a revolver.

43. One of the UCs asked WASHINGTON if he would sell the three (3) firearms for \$3,500. WASHINGTON asked for \$3,600 and one of the undercover agents agreed. The other

undercover agent took the duffel bag containing two (2) firearms and placed it in the trunk of the UC vehicle. One of the UCs handed WASHINGTON \$3,600 to complete the transaction for the three (3) firearms. The UCs took the case containing the revolver and brought it to the trunk of the UC vehicle. After the UCs secured the firearms in the trunk of the UC vehicle, the UCs walked back to the Nissan and returned the duffel bag and case to WASHINGTON.

44. Once the UCs departed, surveillance units observed KADIRI approach WASHINGTON in the blue Kia. WASHINGTON and KADIRI were seen speaking in between the vehicles before they both entered an apartment in building 2501.

45. The firearms and ammunition purchased were: (1) a Smith & Wesson, model SD9, 9mm caliber pistol, bearing partially obliterated serial number: **F2639; (2) a Privately Made multi caliber AR type pistol; and (3) a Charter Arms, model Undercover, .38 caliber revolver bearing serial number 46664; and, (4) five (5) rounds of Remington .38 caliber ammunition recovered from the Charter Arms revolver. All of the aforementioned firearms and ammunition, with the exception of the Privately Made multi caliber AR type pistol, were manufactured outside the State of Florida.

46. Law enforcement confirmed that, prior to this date, KADIRI had been convicted of multiple felonies in the United States Southern District of Florida on December 21, 2006, in case number 06-CR-80127-DMM, including firearms and narcotics related convictions. Based on the amount of time that KADIRI served on one or more of the aforementioned felonies, KADIRI knew he was a convicted felon.

June 16, 2025 - Controlled Purchase of Firearms (WASHINGTON and KADIRI)

47. On June 16, 2025, two ATF UCs purchased two (2) firearms from WASHINGTON and KADIRI at KADIRI's Residence.

48. At approximately 10:40 a.m., surveillance was initiated in the area of KADIRI's

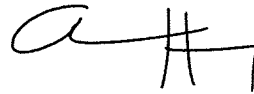
Residence. At approximately 10:51 a.m., surveillance units observed KADIRI exit his Nissan Altima and enter his apartment. At approximately 11:12 a.m., WASHINGTON arrived in his Kia vehicle and parked adjacent to KADIRI's Nissan. Surveillance units observed both WASHINGTON and KADIRI meet near WASHINGTON's Kia. After meeting WASHINGTON, KADIRI returned to his Residence; KADIRI then exited the front door of his Residence and remained seated outside his front door. At approximately 11:26 a.m., the UCs arrived at KADIRI's Residence. The UCs exited the UC vehicle and approached WASHINGTON's Kia. The UCs entered WASHINGTON's Kia. While inside the vehicle, the UCs observed an AR-style pistol within a bag. WASHINGTON acknowledged the AR-style pistol and stated he was waiting on the other firearms to arrive.

49. Shortly thereafter, WASHINGTON placed a telephone call to a telephone number ending in 7315. The UCs observed the telephone number on WASHINGTON's Kia Bluetooth vehicle screen. Simultaneously, the UCs observed KADIRI answering his telephone. Law enforcement investigation revealed that the telephone number ending in 7315 was associated with KADIRI. After several calls between KADIRI and WASHINGTON, WASHINGTON stated that the firearms were in the same apartment complex and indicated that KADIRI was traveling to retrieve the other firearms for sale. At approximately 11:59 a.m., KADIRI was observed by both UCs and surveillance units using the telephone, departing his residence, and subsequently entering his Nissan vehicle. At approximately 12:08 p.m., KADIRI, was observed parking his Nissan in front of his residence, next to WASHINGTON's Kia. Shortly thereafter, the UCs observed an unknown black male, exit the front passenger seat of KADIRI's Nissan. WASHINGTON then exited his Kia, leaving the UCs inside, and entered inside KADIRI's Nissan. Approximately one minute later, WASHINGTON returned to his Kia, holding a black pistol, which observed by both

the UCs and surveillance units. WASHINGTON informed the UCs that he and KADIRI were waiting for three (3) more firearms, that were within the same complex. The UCs provided \$2,200 to WASHINGTON for the purchase of a Radical Firearms, model RF-15 multi-caliber pistol, bearing serial number 19-101949, and a Glock model 48, 9 mm caliber pistol, bearing serial number BMMM420, which were both manufactured outside of the state of Florida.

50. As the UCs exited WASHINGTON's vehicle, KADIRI was observed exiting his Nissan and entering his Residence. Shortly thereafter, WASHINGTON exited his Kia and entered KADIRI's Residence.

FURTHER AFFIANT SAYETH NAUGHT.



Badge No. 4973

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 this 16th day of June 2025.



HONORABLE MARTY FULGUEIRA ELFENBEIN
UNITED STATES MAGISTRATE JUDGE