

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

LAKESHA STITH, a/k/a "Auntie"
ASHLEY AGUILAR
MIKAL DAVIS
JAMES JOHNSON-ROSS, a/k/a "Zan" or "Talzan"
MARCOS MONARREZ, Jr., a/k/a "NeNe"
JESSICA NIEBAUER
MONIQUE VALENCIA
BLAKE YOUNG, a/k/a "Money"
ASIAH YOUNG-ATWELL
CARLOS ZAMORA, a/k/a "Los"

Criminal No. 3:25-cr-14

[UNDER SEAL]

(18 U.S.C. §§ 1962(c), 1956(h))

INDICTMENT

COUNT ONE
(Racketeering)

The grand jury charges:

THE ENTERPRISE

1. The Cambria County Prison (CCP) is a County Prison operated since 1995 at its current location in Cambria Township, Cambria County, Pennsylvania.
2. The CCP is a minimum to maximum security adult detention center with an operating capacity of 493 inmates. The CCP is comprised of eight housing units with an operating capacity ranging from 62 to 88 inmates in each unit, depending on the housing unit. Housing Units A, C, D, and E are two-person barred/solid door cells and Housing Units B, F, and G are dormitory style where the inmates and detainees reside. The facility has an indoor gymnasium, a medical department with nursing staff, a food service department, and an in-house maintenance department.
3. While medical staff were assigned to the medical department, they were able to

move among Housing Units during daily medicine distribution. Correctional officers (“COs”) could “bid” to work a consistent shift on a particular Housing Unit and would report to the same Unit for each shift. Both medical staff and COs could request permission for an inmate to be taken to the medical department for treatment through “sick calls”. COs were also present in the medical department daily to pick up the “sick call” paperwork to return to the Housing Units.

4. Pennsylvania law prohibits the sale or furnishing of contraband to an inmate and prohibits the possession of contraband by an inmate confined in a State or county correctional institution. The law defines "contraband" as (a) any controlled substance included in Schedules I through V of the act of April 14, 1972 (P.L.233, No.64) known as The Controlled Substance, Drug, Device and Cosmetic Act; (b) Money; (c.1) Telecommunication device capable of transmitting telephonic, electronic, digital, cellular, or radio communications, including cellular telephones. Pennsylvania Consolidated Statutes, Title 18, Section 5123, Contraband.

5. Pennsylvania law prohibits the offer or acceptance of any benefit as consideration for a violation of a known legal duty as (a) public servant. Pennsylvania Consolidated Statutes, Title 18, Section 4701, Bribery in Official Matters.

6. CCP employed 85 correctional officers (COs) and 15 contracted medical staff in 2023. The CCP had a contract with the United States Marshal Service to house and provide medical services to pre-trial federal inmates.

7. COs received training in ethics and professionalism during basic training during the initial training academy. COs have a duty to further the legitimate purpose of the CCP by ensuring that inmates follow the rules enacted for their health and safety and the health and safety of prison employees and the larger community, including the prohibition of criminal activity while incarcerated. During training, COs were taught that:

Inappropriate personal or intimate relationships with inmates can include: bribery; conflicts of interest; solicitation and acceptance of gifts; the offering of gifts, favors and services to inmates, ex-inmates, relatives of inmates; improper contact or failure to report contact with inmates, ex-inmates, relatives or friends; and the appearance of inappropriate relationships. Policy GA-10 – Staff / Inmate Relationships

8. According to the Correctional Officer's Policy Manual:

Unauthorized use, manufacture, distribution, dispensing, sale, transfer, or possession of alcohol or controlled substances on the County's property or otherwise in the workplace (unless possessed as a result of performance of duties, i.e., confiscated as contraband) shall constitute just cause for discharge on the first offense. Policy GA-13 - Drug-Free and Alcohol-Free Workplace.

Contraband is defined as any letter, note, drugs, alcohol, weapons of any sort, cellular telephones or any other article not authorized by the administration or prison regulations.

9. Medical Department staff received training in prison security, ethics and professionalism. Medical Department staff were taught:

Inappropriate personal or intimate relationships with inmates can include: bribery; conflicts of interest; solicitation and acceptance of gifts. Contraband is prohibited inside the CCP and includes controlled substances, alcohol, tobacco, cellular telephones, tools, etc.

10. CCP, a legal entity, constituted an "enterprise", as defined in Title 18, United States Code, Section 1961(4). CCP engaged in, and its activities affected, interstate commerce.

PURPOSE OF THE ENTERPRISE

11. The primary purpose of the CCP was the safe confinement, supervision and rehabilitation of county, state, and federal inmates.

PURPOSES OF THE DEFENDANTS

12. The primary purposes of the defendants included:
- a. for correctional officer and medical staff defendants, using their official positions

at the CCP to

- i. enrich themselves by trafficking in items prohibited by the prison, i.e. contraband, including controlled substances, cellular telephones, security tools and tobacco
- ii. engage in personal / intimate relationships with inmates
- iii. subvert the safe and proper administration of the prison by, among other things, monitoring other inmates who were reporting to prison authorities that contraband was being trafficked, monitoring other inmates financial accounts that owed a debt related to the smuggled contraband, or warning inmates of impending searches and the implementation of additional security measures,

b. for inmate defendants, to

- i. corrupt CO and Medical Staff Nurse by offering them money and other things of value including personal / intimate relationships in exchange for the CO and Medical Staff Nurse
 - 1. smuggling contraband into the CCP
 - 2. transporting illegal contraband within the CCP
 - 3. monitoring other inmates who were reporting to prison authorities that contraband was being trafficked
 - 4. monitoring other inmates financial accounts that owed a debt related to the smuggled contraband
 - 5. warning inmates of impending searches and the implementation of additional security measures
- ii. enrich themselves by trafficking in items prohibited by the prison, i.e.

contraband, including controlled substances, cellular telephones, security tools and tobacco

- c. for all defendants, violating the legitimate purposes of the CCP to further their illegal schemes and creating a culture of corruption inside the prison that would allow them to continue the racketeering activity and to protect and expand the defendant's criminal operations.

THE DEFENDANTS

13. Correctional Officer and Medical Staff Nurse: COs and Medical staff have a duty to further the legitimate purposes of the CCP by ensuring that inmates follow the rules enacted for their health and safety and the health and safety of prison employees and the larger community, including, most importantly, the prohibition of criminal activity while incarcerated. The correctional officer defendant, Lakesha STITH, abused her position of trust as a sworn officer of the CCP by engaging in illegal activities for the purposes of enriching herself and engaging in personal / intimate relations with inmates. The medical staff defendant, Asiah Young-ATWELL, abused her position of trust by engaging in illegal activities for the purposes of enriching herself and engaging in personal / intimate relations with inmates. These correctional officer and medical staff defendants received bribes in exchange for bringing contraband into the CCP including, controlled substances, cellular telephones, security tools, and tobacco. This criminal conduct created a culture of corruption and lawlessness and perverted the intended purposes of the CCP. The following defendants were a Correctional Officer assigned to Housing Unit B, and a Medical Staff Nurse, for some or all of the time charged in this Indictment or smuggled contraband to inmates housed at the CCP for some or all of the time charged in this Indictment:

- a. **LAKESHA STITH** entered on duty with the CCP on May 15, 2023
- b. **ASIAH YOUNG-ATWELL** entered on duty at the CCP on March 20, 2023

14. Inmates: The inmate defendants solicited STITH and ATWELL to smuggle contraband into the CCP which the inmate defendants and co-conspirators, in turn, sold to other CCP inmates at substantial profit. The inmate defendants used facilitators, who are both known and unknown to the grand jury, outside of the CCP to bribe the STITH and ATWELL defendants, and to manage the illegal proceeds of their contraband trafficking activities occurring inside the CCP. The inmate defendants used contraband cellular telephones to coordinate smuggling and contraband trafficking with the STITH, ATWELL and individuals outside of the CCP who facilitated their contraband trafficking activities. The following defendants were inmates housed at the CCP for some or all of the period charged in this Indictment:

- a. **MIKAL DAVIS,**
- b. **JAMES JOHNSON-ROSS,**
- c. **MARCOS MONARREZ, Jr.,**
- d. **BLAKE YOUNG,**
- e. **CARLOS ZAMORA.**

MEANS AND METHODS OF THE DEFENDANTS

15. Among the means and methods by which the defendants and others pursued their illegal purposes were the following:

- a. STITH and ATWELL accepted or agreed to accept payments from facilitators and/or inmates or engaged in personal / intimate relationships with inmates as consideration for smuggling contraband into the CCP, including controlled substances, cellular telephones, security tools and tobacco. The "going rate" for a Medical Staff Nurse to smuggle contraband cellular telephones into the CCP was an average of \$600 per cellular telephone. The "going rate" for an inmate to purchase a contraband cellular telephone once it was introduced to the CCP was an average of \$10,000 per cellular telephone.

- b. Defendants conspired to traffic in controlled substances within the CCP, including K2, a Schedule I synthetic cannabinoid, Tetrahydrocannabinol (“THC”), a Schedule I component in cannabis, buprenorphine/naloxone, commonly referred to by the trade name "Suboxone," a Schedule III prescription opioid used to treat heroin addiction but abused by inmates, and other contraband including cellular telephones, security tools and tobacco.
- c. Defendants conspired to smuggle contraband, including controlled substances, cellular telephones, security tools and tobacco, into the prison, in order to enrich themselves and protect and expand the defendants' criminal operations.
- d. Defendants possessed contraband, namely controlled substances, cellular telephones, security tools and tobacco inside and outside of the prison, with the intent to distribute and sell them in order to protect and expand the defendants' criminal operations.
- e. Inmates acted as both wholesalers and retailers of contraband and in the process made profits that far exceeded the profits that could be made by selling similar drugs on the street. For example, the average retail price for Suboxone is between \$5 and \$20 per strip, depending on the dosage. Defendant inmates could purchase Suboxone strips inside the CCP for \$75 each and further sell them inside the CCP for up to \$250 each, or for a profit of more than 300 percent.
- f. STITH and ATWELL smuggled contraband into the CCP. Although required to pass through screening, they were able to hide contraband in lunch bags and containers.
- g. Inside the facility, STITH and ATWELL delivered contraband to, among other locations,

- i. inmates in their housing unit;
 - ii. the Medical Department, which had private examination rooms without security cameras; and
 - iii. pre-arranged "stash" locations like inmate cells, storage closets, and other places where contraband could be hidden and then later retrieved by inmates.
- h. Inside the facility, defendant inmates who had jobs that allowed them to move throughout the housing unit, commonly referred to as "inmate workers," "unit workers," and other positions took orders for contraband from inmates, and delivered contraband to inmates.
- i. STITH and ATWELL had personal / intimate relationships with defendant inmates. In addition, these personal / intimate relationships cemented the smuggling and trafficking relationships between STITH, ATWELL, and the inmates.
- j. Inmates and facilitators paid STITH and ATWELL for smuggled contraband via mobile payment services including Cash App. Inmate defendants also received payments from inmates for contraband through Cash App, often with the assistance of facilitators.
- k. Defendants used cellular telephones to communicate with one another and coordinate contraband smuggling and trafficking activities. STITH, ATWELL, and facilitators also used CCP inmate communication facilities under false names for contraband smuggling purposes.
- l. STITH and ATWELL warned inmate defendants when the prison administration

was planning cell searches so that defendant inmates could hide contraband or pass it to other inmates whose cells were not being searched. STITH and ATWELL also monitored inmates to determine if they were providing information to the prison administration about contraband smuggling. When STITH and ATWELL learned that inmates were providing information to the prison administration or "snitching" or "telling," STITH and ATWELL would alert defendant inmates.

- m. Defendant inmates possessed weapons to protect the contraband and threatened violence against inmates believed to have reported the defendants contraband smuggling to the prison administration.

THE RACKETEERING VIOLATION

16. From in and around July 2023, and continuing through on or about December 19, 2023, in the Western District of Pennsylvania,

**LAKESHA STITH
MIKAL DAVIS
JAMES JOHNSON-ROSS
MARCOS MONARREZ, Jr.
BLAKE YOUNG
ASIAH YOUNG-ATWELL
CARLOS ZAMORA**

the defendants, together with others known and unknown to the Grand Jury, being persons employed by and associated with the Cambria County Prison, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully and knowingly conducted and participated, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5).

THE PATTERN OF RACKETEERING ACTIVITY

17. The pattern of racketeering activity as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisted of the following acts:

a. DEFENDANT LAKESHA STITH, a/k/a "Auntie"

RACKETEERING ACT ONE
(Bribery Conspiracy)

From in and around July 2023, and continuing through on or about November 7, 2023, in the Western District of Pennsylvania, Correctional Officer **LAKESHA STITH, a/k/a "Auntie"**, the defendant, as an employee of the CCP, did knowingly, intentionally, and unlawfully offer, confer and agree to confer upon another, and solicit, accept and agree to accept from another, any benefit as consideration for a violation of a known legal duty as a public servant.

In violation of Pennsylvania Consolidated Statutes, Title 18, Sections 4701 and 903, Bribery, Conspiracy.

RACKETEERING ACT TWO
(Conspiracy to Distribute and Possess with Intent to Distribute K2 and Suboxone)

From in and around July 2023, and continuing through on or about November 7, 2023, in the Western District of Pennsylvania, Correctional Officer **LAKESHA STITH, a/k/a "Auntie"**, the defendant, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of synthetic cannabinoid, also known as K2, also known as XLR1 1, a Schedule I controlled substance, and a quantity of a mixture or substance containing a detectable amount of buprenorphine/naloxone, also known as Suboxone, a Schedule III controlled substance.

In violation of Title 21, United States Code, Sections 841 and 846.

RACKETEERING ACT THREE
(Money Laundering Conspiracy)

From in and around July 2023, and continuing through on or about November 7, 2023, in the Western District of Pennsylvania, **LAKESHA STITH, a/k/a "Auntie"**, the defendant, did combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses against the United States, to wit: money laundering in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), the elements of which are to knowingly conduct a financial transaction affecting interstate and foreign commerce that involved the proceeds of a specified unlawful activity, that is, an offense listed in Title 18, Section 1961(1) (racketeering activity), knowing that the property involved in the transaction represented the proceeds of some form of unlawful activity, that is racketeering activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is racketeering activity.

In violation of Title 18, United States Code, Section 1956(h).

b. MIKAL DAVIS

RACKETEERING ACT FOUR
(Bribery Conspiracy)

From in and around July 2023, and continuing through on or about December 19, 2023, in the Western District of Pennsylvania, **MIKAL DAVIS**, the defendant, as an inmate of the CCP, did knowingly, intentionally, and unlawfully offer, confer and agree to confer upon another, and solicit, accept and agree to accept from another, any benefit as consideration for a violation of a known legal duty as a public servant.

In violation of Pennsylvania Consolidated Statutes, Title 18, Section 4701 and 903,
Bribery, Conspiracy.

RACKETEERING ACT FIVE
(Money Laundering Conspiracy)

From in and around July 2023, and continuing through on or about December 19, 2023, in the Western District of Pennsylvania, **MIKAL DAVIS**, the defendant, did combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses against the United States, to wit: money laundering in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), the elements of which are to knowingly conduct a financial transaction affecting interstate and foreign commerce that involved the proceeds of a specified unlawful activity, that is, an offense listed in Title 18, United States Code, Section 1961(1) (racketeering activity), knowing that the property involved in the transaction represented the proceeds of some form of unlawful activity, that is racketeering activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is racketeering activity.

In violation of Title 18, United States Code, Section 1956(h).

c. JAMES JOHNSON ROSS, a/k/a “Zan”, a/k/a “Talzan”

RACKETEERING ACT SIX
(Bribery Conspiracy)

From in and around July 2023, and continuing through on or about December 19, 2023, in the Western District of Pennsylvania, **JAMES JOHNSON-ROSS, a/k/a “Zan”, a/k/a “Talzan”**, the defendant, as an inmate of the CCP, did knowingly, intentionally, and unlawfully offer, confer and agree to confer upon another, and solicit, accept and agree to accept from another, any benefit as consideration for a violation of a known legal duty as a public servant.

In violation of Pennsylvania Consolidated Statutes, Title 18, Section 4701 and 903, Bribery, Conspiracy.

RACKETEERING ACT SEVEN

(Conspiracy to Distribute and Possess with Intent to Distribute Tetrahydrocannabinol and Suboxone)

From in and around July 2023, and continuing through on or about December 19, 2023, in the Western District of Pennsylvania, **JAMES JOHNSON-ROSS, a/k/a "Zan", a/k/a "Talzan"**, the defendant, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of Tetrahydrocannabinol ("THC"), a Schedule I controlled substance component in cannabis, and a quantity of a mixture or substance containing a detectable amount of buprenorphine/naloxone, also known as Suboxone, a Schedule III controlled substance.

In violation of Title 21, United States Code, Sections 841 and 846.

RACKETEERING ACT EIGHT

(Money Laundering Conspiracy)

From in and around July 2023, and continuing through on or about December 19, 2023, in the Western District of Pennsylvania, **JAMES JOHNSON-ROSS, a/k/a "Zan" or "Talzan"**, the defendant, did combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses against the United States, to wit: money laundering in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), the elements of which are to knowingly conduct a financial transaction affecting interstate and foreign commerce that involved the proceeds of a specified unlawful activity, that is, an offense listed in Title 18, United States Code, Section 1961(1) (racketeering activity), knowing that the property involved in the transaction represented the proceeds of some form of unlawful activity, that is racketeering activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is racketeering activity.

In violation of Title 18, United States Code, Section 1956(h).

d. MARCOS MONARREZ, Jr., a/k/a “NeNe”

RACKETEERING ACT NINE
(Bribery Conspiracy)

From in and around July 2023, and continuing through on or about December 19, 2023, in the Western District of Pennsylvania, **MARCOS MONARREZ, Jr., a/k/a “NeNe”**, the defendant, as an inmate of the CCP, did knowingly, intentionally, and unlawfully offer, confer and agree to confer upon another, and solicit, accept and agree to accept from another, any benefit as consideration for a violation of a known legal duty as a public servant.

In violation of Pennsylvania Consolidated Statutes, Title 18, Section 4701 and 903, Bribery, Conspiracy.

RACKETEERING ACT TEN
(Conspiracy to Distribute and Possess with Intent to Distribute K2)

From in and around July 2023, and continuing through on or about December 19, 2023, in the Western District of Pennsylvania, **MARCOS MONARREZ, Jr., a/k/a “NeNe”**, the defendant, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of synthetic cannabinoid, also known as K2, also known as XLRI 1, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841 and 846.

RACKETEERING ACT ELEVEN
(Money Laundering Conspiracy)

From in and around July 2023, and continuing through on or about December 19, 2023, in the Western District of Pennsylvania, **MARCOS MONARREZ, JR., a/k/a "NeNe"**, the defendant, did combine, conspire, and agree with other persons known and unknown to the Grand

Jury to commit offenses against the United States, to wit: money laundering in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), the elements of which are to knowingly conduct a financial transaction affecting interstate and foreign commerce that involved the proceeds of a specified unlawful activity, that is, an offense listed in Title 18, United States Code, Section 1961(1) (racketeering activity), knowing that the property involved in the transaction represented the proceeds of some form of unlawful activity, that is racketeering activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is racketeering activity.

In violation of Title 18, United States Code, Section 1956(h).

e. BLAKE YOUNG, a/k/a “Money”

RACKETEERING ACT TWELVE
(Bribery Conspiracy)

From in and around July 2023, and continuing through on or about December 19, 2023, in the Western District of Pennsylvania, **BLAKE YOUNG, a/k/a “Money”**, the defendant, as an inmate of the CCP, did knowingly, intentionally, and unlawfully offer, confer and agree to confer upon another, and solicit, accept and agree to accept from another, any benefit as consideration for a violation of a known legal duty as a public servant.

In violation of Pennsylvania Consolidated Statutes, Title 18, Section 4701 and 903, Bribery, Conspiracy.

RACKETEERING ACT THIRTEEN
(Conspiracy to Distribute and Possess with Intent to Distribute K2 and Suboxone)

From in and around July 2023, and continuing through on or about December 19, 2023, in the Western District of Pennsylvania, **BLAKE YOUNG, a/k/a “Money”**, the defendant, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with others

known and unknown to the Grand Jury, to distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of synthetic cannabinoid, also known as K2, also known as XLR1 1, a Schedule I controlled substance, and a quantity of a mixture or substance containing a detectable amount of buprenorphine/naloxone, also known as Suboxone, a Schedule III controlled substance.

In violation of Title 21, United States Code, Sections 841 and 846.

RACKETEERING ACT FOURTEEN
(Money Laundering Conspiracy)

From in and around July 2023, and continuing through on or about December 19, 2023, in the Western District of Pennsylvania, **BLAKE YOUNG, a/k/a "Money"**, the defendant, did combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses against the United States, to wit: money laundering in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), the elements of which are to knowingly conduct a financial transaction affecting interstate and foreign commerce that involved the proceeds of a specified unlawful activity, that is, an offense listed in Title 18, United States Code, Section 1961(1) (racketeering activity), knowing that the property involved in the transaction represented the proceeds of some form of unlawful activity, that is racketeering activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is racketeering activity.

In violation of Title 18, United States Code, Section 1956(h).

f. ASIAH YOUNG-ATWELL

RACKETEERING ACT FIFTEEN
(Bribery Conspiracy)

From in and around July 2023, and continuing through on or about November 1, 2023, in

the Western District of Pennsylvania, Medical Staff Nurse **ASIAH YOUNG-ATWELL**, the defendant, as an employee of the CCP, did knowingly, intentionally, and unlawfully offer, confer and agree to confer upon another, and solicit, accept and agree to accept from another, any benefit as consideration for a violation of a known legal duty as a public servant.

In violation of Pennsylvania Consolidated Statutes, Title 18, Section 4701 and 903, Bribery, Conspiracy.

RACKETEERING ACT SIXTEEN

(Conspiracy to Distribute and Possess with Intent to Distribute Tetrahydrocannabinol)

From in and around July 2023, and continuing through on or about November 1, 2023, in the Western District of Pennsylvania, **ASIAH YOUNG-ATWELL**, the defendant, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of Tetrahydrocannabinol (“THC”), a Schedule 1 controlled substance component in cannabis.

In violation of Title 21, United States Code, Sections 841 and 846.

RACKETEERING ACT SEVENTEEN

(Money Laundering Conspiracy)

From in and around July 2023, and continuing through on or about November 1, 2023, in the Western District of Pennsylvania, **ASIAH YOUNG-ATWELL**, the defendant, did combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses against the United States, to wit: money laundering in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), the elements of which are to knowingly conduct a financial transaction affecting interstate and foreign commerce that involved the proceeds of a specified unlawful activity, that is, an offense listed in Title 18, Section 1961(1) (racketeering activity), knowing that the property involved in the transaction represented the proceeds of some form of unlawful

activity, that is racketeering activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is racketeering activity.

In violation of Title 18, United States Code, Section 1956(h).

g. CARLOS ZAMORA, a/k/a "Los"

RACKETEERING ACT EIGHTEEN
(Bribery Conspiracy)

From in and around July 2023, and continuing through on or about December 19, 2023, in the Western District of Pennsylvania, **CARLOS ZAMORA, a/k/a "Los"**, the defendant, as an inmate of the CCP, did knowingly, intentionally, and unlawfully offer, confer and agree to confer upon another, and solicit, accept and agree to accept from another, any benefit as consideration for a violation of a known legal duty as a public servant.

In violation of Pennsylvania Consolidated Statutes, Title 18, Section 4701 and 903, Bribery, Conspiracy.

RACKETEERING ACT NINETEEN
(Money Laundering Conspiracy)

From in and around July 2023, and continuing through on or about December 19, 2023, in the Western District of Pennsylvania, **CARLOS ZAMORA, a/k/a "Los"**, the defendant, did combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses against the United States, to wit: money laundering in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), the elements of which are to knowingly conduct a financial transaction affecting interstate and foreign commerce that involved the proceeds of a specified unlawful activity, that is, an offense listed in Title 18, Section 1961(1) (racketeering activity), knowing that the property involved in the transaction represented the proceeds of some form of unlawful activity, that is racketeering activity, and knowing that the transaction was designed in

whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is racketeering activity.

In violation of Title 18, United States Code, Section 1956(h).

All in violation of Title 18, United States Code, Section 1962(c).

COUNT TWO

The grand jury further charges:

From in and around July 2023, and continuing through in and around October 2023, in the Western District of Pennsylvania, **ASHLEY AGUILAR**, **JESSICA NIEBAUER**, and **MONIQUE VALENCIA**, the defendants, did combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses against the United States, to wit: money laundering in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), the elements of which are to knowingly conduct a financial transaction affecting interstate and foreign commerce that involved the proceeds of a specified unlawful activity, that is, an offense listed in Title 18, Section 1961(1) (racketeering activity), knowing that the property involved in the transaction represented the proceeds of some form of unlawful activity, that is racketeering activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is racketeering activity.

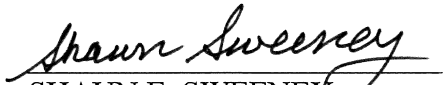
In violation of Title 18, United States Code, Section 1956(h).

A True Bill,


FOREPERSON


TROY RIVETTI
Acting United States Attorney
PA ID No. 56816


MAUREEN SHEEHAN-BALCHON
Assistant United States Attorney
PA ID No. 78059


SHAUN E. SWEENEY
Assistant United States Attorney
PA ID No. 53568