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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2019 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JERRELL EUGENE ANDERSON,
CHRISTOPHER CANION VAN HOLTON,
ADAN SEPULVEDA,
KENNETH LASHAWN HADLEY,
JACKIE WALTER BURNS,

Defendants.

CR No. 19-

CR 19-00163

GW

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances; 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii), (b)(1)(B)(viii), (b)(1)(C): Distribution of and Possession with Intent to Distribute Methamphetamine; 21 U.S.C. § 841(a)(1), (b)(1)(C): Distribution of Heroin Resulting in Death; 21 U.S.C. § 841(a)(1), (b)(1)(B)(i), (b)(1)(C): Possession with Intent to Distribute Heroin; 21 U.S.C. § 841(a)(1), (b)(1)(C): Distribution of Cocaine Base; 21 U.S.C. § 841(a)(1), (b)(1)(C): Possession of Cocaine with Intent to Distribute; 18 U.S.C. § 924(c)(1)(A)(i): Possession of a Firearm in Furtherance of a Drug Trafficking Crime; 18 U.S.C. § 2(a): Aiding and Abetting; 18 U.S.C. § 2(a), (b): Aiding and Abetting and Causing an Act to be Done]

1 The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 846]

3
4 A. OBJECTS OF THE CONSPIRACY

5 Beginning on a date unknown to the Grand Jury, and continuing
6 until on or about March 4, 2019, in Los Angeles County, within the
7 Central District of California, and elsewhere, defendants JERRELL
8 EUGENE ANDERSON ("ANDERSON"), CHRISTOPHER CANION VAN HOLTON ("VAN
9 HOLTON"), ADAN SEPULVEDA ("SEPULVEDA"), KENNETH LASHAWN HADLEY
10 ("HADLEY"), and JACKIE WALTER BURNS, and others known and unknown to
11 the Grand Jury, conspired and agreed with each other to knowingly and
12 intentionally commit the following offenses:

- 13 • distribute and possess with intent to distribute at least 50
14 grams of methamphetamine, a schedule II controlled substance,
15 in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii);
- 16 • distribute and possess with intent to distribute a mixture
17 and substance containing a detectable amount of heroin, a
18 schedule I narcotic drug controlled substance, in violation
19 of 21 U.S.C. § 841(a)(1), (b)(1)(C);
- 20 • distribute a mixture and substance containing a detectable
21 amount of cocaine base in the form of crack cocaine, a
22 Schedule II narcotic drug controlled substance, in violation
23 of 21 U.S.C. § 841(a)(1), (b)(1)(C); and
- 24 • possess with intent to distribute a mixture and substance
25 containing a detectable amount of cocaine, a schedule II
26 narcotic drug controlled substance, in violation of 21 U.S.C.
27 § 841(a)(1), (b)(1)(C).

1 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
2 ACCOMPLISHED

3 The objects of the conspiracy were to be accomplished, in
4 substance, as follows:

5 1. Defendant ANDERSON, and others known and unknown, using the
6 monikers "drugpharmacist" and "rickandmortyshop," would offer for
7 sale and sell drugs - including methamphetamine, heroin, cocaine, and
8 crack cocaine - to customers in exchange for the cryptocurrency
9 Bitcoin on the darknet marketplaces Dream and Wall Street Market.

10 2. Defendants ANDERSON, VAN HOLTON, SEPULVEDA, HADLEY, and
11 BURNS, and others known and unknown, would package drugs in stuffed
12 animals for shipment to "drugpharmacist" and "rickandmortyshop"
13 customers.

14 3. Defendants ANDERSON, VAN HOLTON, SEPULVEDA and HADLEY, and
15 others known and unknown, would deliver packages containing drugs
16 ("drug parcels") to post offices in Los Angeles County for shipment
17 to "drugpharmacist" and "rickandmortyshop" customers.

18 C. OVERT ACTS

19 On or about the following dates, in furtherance of the
20 conspiracy and to accomplish its objects, defendants ANDERSON, VAN
21 HOLTON, SEPULVEDA, HADLEY, and BURNS, and others known and unknown,
22 committed various overt acts in Los Angeles County, with in the
23 Central District of California, and elsewhere, including, but not
24 limited to, the following:

25 Overt Act No. 1: On or about July 7, 2018, using the moniker
26 "drugpharmacist" on the darknet marketplace Wall Street Market,
27 defendant ANDERSON, and others known and unknown, caused a drug
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1 parcel containing approximately 8.1 grams of methamphetamine to be
2 shipped to a "drugpharmacist" customer in Torrance, California.

3 Overt Act No. 2: On or about July 17, 2018, in Los Angeles
4 County, using the moniker "drugpharmacist" on the darknet marketplace
5 Dream, defendant ANDERSON, and others known and unknown, caused a
6 drug parcel containing approximately 3.7 grams of methamphetamine to
7 be shipped to an individual they believed to be a "drugpharmacist"
8 customer but who was, in fact, an undercover detective with the
9 Fairfax, Virginia Police Department ("UC-1") for \$78 in Bitcoin.

10 Overt Act No. 3: On or about August 1, 2018, in Los Angeles
11 County, using the moniker "drugpharmacist" on Dream, defendant
12 ANDERSON, and others known and unknown, caused a drug parcel
13 containing approximately 16 grams of methamphetamine to be shipped to
14 UC-1 for \$234 in Bitcoin.

15 Overt Act No. 4: On or about August 7, 2018, in Los Angeles
16 County, defendant ANDERSON, and others known and unknown, caused a
17 drug parcel containing approximately 0.2 grams of a mixture and
18 substance containing a detectable amount of heroin to be shipped to
19 J.W. in Knoxville, Tennessee.

20 Overt Act No. 5: On or about August 7, 2018, at a post office
21 on Winnetka Avenue in Los Angeles, defendant SEPULVEDA delivered drug
22 parcels for shipment to customers, including a drug parcel containing
23 0.2 grams of a mixture and substance containing a detectable amount
24 of heroin to J.W. in Knoxville, Tennessee.

25 Overt Act No. 6: On or about August 12, 2018, in Los Angeles
26 County, using the moniker "drugpharmacist" on Dream, defendant
27 ANDERSON, and others known and unknown, caused a drug parcel
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1 containing approximately 32.8 grams of methamphetamine to be shipped
2 to UC-1 for \$442 in Bitcoin.

3 Overt Act No. 7: On or about August 19, 2018, in Los Angeles
4 County, using the moniker "drugpharmacist" on Dream, defendant
5 ANDERSON, and others known and unknown, caused a drug parcel
6 containing approximately 2 grams of a mixture and substance
7 containing a detectable amount of heroin to be shipped to UC-1 for
8 \$213 in Bitcoin.

9 Overt Act No. 8: On or about August 20, 2018, at a Home Depot
10 store in the Woodland Hills area of Los Angeles, defendants ANDERSON
11 and VAN HOLTON purchased supplies for packaging drug parcels for
12 approximately \$87.11.

13 Overt Act No. 9: On or about August 20, 2018, at an apartment
14 on Sherman Way in the Winnetka area of Los Angeles, defendants
15 ANDERSON, VAN HOLTON, SEPULVEDA, and HADLEY, and others known and
16 unknown, packaged drug parcels for shipment to customers.

17 Overt Act No. 10: On or about August 20, 2018, at a post
18 office in the Canoga Park area of Los Angeles, defendant SEPULVEDA
19 delivered drug parcels for shipment to customers, including a drug
20 parcel containing approximately 1.3 grams of a mixture and substance
21 containing a detectable amount of cocaine base in the form of crack
22 cocaine.

23 Overt Act No. 11: On or about August 20, 2018, at a post
24 office in the Reseda area of Los Angeles, defendants ANDERSON and VAN
25 HOLTON delivered drug parcels for shipment to customers, including a
26 drug parcel containing approximately 7.5 grams of methamphetamine and
27 approximately 0.25 grams of a mixture and substance containing a
28 detectable amount of heroin.

1 Overt Act No. 12: On or about August 24, 2018, at a Staples
2 store in Woodland Hills, defendants ANDERSON and VAN HOLTON purchased
3 supplies for shipping drug parcels for approximately \$495.88.

4 Overt Act No. 13: On or about August 30, 2018, in Los Angeles
5 County, using the moniker "drugpharmacist" on Dream, defendant
6 ANDERSON, and others known and unknown, caused a drug parcel
7 containing approximately 31.8 grams of methamphetamine to be shipped
8 to UC-1 for \$442 in Bitcoin.

9 Overt Act No. 14: On or about September 12, 2018, in Los
10 Angeles County, using the moniker "drugpharmacist" on Dream,
11 defendant ANDERSON, and others known and unknown, caused a drug
12 parcel containing approximately 29.5 grams of methamphetamine to be
13 shipped to UC-1 for \$442 in Bitcoin.

14 Overt Act No. 15: On or about September 13, 2018, at a post
15 office in the Studio City area of Los Angeles, defendant HADLEY
16 delivered drug parcels for shipment to customers, including a drug
17 parcel containing approximately 29.5 grams of methamphetamine
18 addressed to UC-1.

19 Overt Act No. 16: On or about September 22, 2018, at a post
20 office in the Chatsworth area of Los Angeles, defendant ANDERSON
21 delivered approximately 27 drug parcels for shipment to customers.

22 Overt Act No. 17: On or about October 12, 2018, at a post
23 office in the Sun Valley area of Los Angeles, defendant HADLEY
24 delivered drug parcels for shipment to customers.

25 Overt Act No. 18: On or about October 26, 2018, in Los Angeles
26 County, using the moniker "rickandmortyshop" on Dream, defendant
27 ANDERSON, and others known and unknown, caused a drug parcel
28 containing approximately 3.5 grams of a mixture and substance

1 containing a detectable amount of methamphetamine to be shipped to
2 UC-1 for \$68 in Bitcoin.

3 Overt Act No. 19: On or about January 31, 2019, in Los Angeles
4 County, using the moniker "drugpharmacist" on Dream, defendant
5 ANDERSON, and others known and unknown, caused a drug parcel
6 containing approximately 3.5 grams of a mixture and substance
7 containing a detectable amount of methamphetamine to be shipped to an
8 individual they believed to be a drug customer but who was, in fact,
9 an undercover Federal Bureau of Investigation Special Agent ("UC-2")
10 for \$78.

11 Overt Act No. 20: On or about February 21, 2019, in Los
12 Angeles County, using the moniker "rickandmortyshop" on Dream,
13 defendant ANDERSON, and others known and unknown, caused a drug
14 parcel containing approximately 3.5 grams of a mixture and substance
15 containing a detectable amount of methamphetamine to be shipped to
16 UC-1 for \$67.60 in Bitcoin.

17 Overt Act No. 21: On or about March 4, 2019, in an apartment
18 on Valley View Road in Glendale, California, defendants ANDERSON,
19 SEPULVEDA, and BURNS possessed approximately 128 grams of a mixture
20 and substance containing a detectable amount of methamphetamine,
21 approximately 184 grams of a mixture and substance containing a
22 detectable amount of heroin, and approximately 25 grams of a mixture
23 and substance containing a detectable amount of cocaine for packaging
24 in drug parcels and shipment to customers.

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COUNT TWO

[21 U.S.C. § 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a), (b)]

On or about August 7, 2018, in Los Angeles County, within the Central District of California, defendants JERRELL EUGENE ANDERSON and ADAN SEPULVEDA, aiding and abetting each other, knowingly and intentionally distributed, and caused to be distributed, a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance, to J.W., whose death and serious bodily injury resulted from the use of such substance.

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COUNT THREE

[21 U.S.C. § 841(a)(1), (b)(1)(C)]

On or about August 20, 2018, in Los Angeles County, within the Central District of California, defendant ADAN SEPULVEDA knowingly and intentionally distributed a mixture and substance containing cocaine base in the form of crack cocaine, a Schedule II narcotic drug controlled substance.

COUNT FOUR

[21 U.S.C. § 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2(a)]

On or about August 20, 2018, in Los Angeles County, within the Central District of California, defendants JERRELL EUGENE ANDERSON and CHRISTOPHER CANION VAN HOLTON, aiding and abetting each other, knowingly and intentionally distributed approximately 7.5 grams of methamphetamine, a Schedule II controlled substance.

COUNT FIVE

[21 U.S.C. § 841(a)(1), (b)(1)(B)(viii)]

On or about September 13, 2018, in Los Angeles County, within the Central District of California, defendant KENNETH LASHAWN HADLEY knowingly and intentionally distributed a mixture and substance containing approximately 29.5 grams of methamphetamine, a Schedule II controlled substance.

COUNT SIX

[21 U.S.C. § 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2(a)]

On or about March 4, 2019, in Los Angeles County, in the Central District of California, defendants JERRELL EUGENE ANDERSON, ADAN SEPULVEDA, and JACKIE WALTER BURNS, aiding and abetting each other, possessed with intent to distribute at least 50 grams, that is, approximately 128 grams, of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

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COUNT SEVEN

[21 U.S.C. § 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

On or about March 4, 2019, in Los Angeles County, in the Central District of California, defendants JERRELL EUGENE ANDERSON, ADAN SEPULVEDA, and JACKIE WALTER BURNS, aiding and abetting each other, possessed with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

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COUNT EIGHT

[21 U.S.C. § 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

On or about March 4, 2019, in Los Angeles County, in the Central District of California, defendants JERRELL EUGENE ANDERSON, ADAN SEPULVEDA, and JACKIE WALTER BURNS, aiding and abetting each other, possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule I narcotic drug controlled substance.

1 mixture and substance containing a detectable amount of cocaine, in
2 violation of Title 21, United States Code, Section 841(a)(1),
3 (b)(1)(C), as charged in Count Eight of this Indictment.

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8 Foreperson

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10 NICOLA T. HANNA
United States Attorney

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