

REDACTED

KSC: USAO# 2012R00052

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	:	UNDER SEAL
	:	
v.	:	CRIMINAL NO. ELH-13-0296
	:	
REDACTED	:	
	:	(Conspiracy to Distribute and Possess
ERNEST LEE HARMON,	:	with Intent to Distribute Heroin and
aka "E,"	:	Cocaine Base, 21 U.S.C. § 846;
aka "Memphis,"	:	Distribution and Possession with Intent to
DONTAYE LEE HARMON,	:	Distribute Heroin, 21 U.S.C. § 841(a)(1));
aka "Taye,"	:	Distribution and Possession with Intent to
DAMIAN LERON BROWN,	:	Distribute Cocaine Base, 21 U.S.C. §
aka "D,"	:	841(a)(1))
aka "DB,"	:	
aka "DBrown,"	:	
REDACTED	:	
	:	
and	:	
JESSICA KNODE,	:	
	:	
Defendants.	:	
	:	.oOo.

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

From at least January 2012, up to and including the date of this indictment, in the District of Maryland and elsewhere, the defendants,

REDACTED

ERNEST LEE HARMON,  
aka "E,"  
aka "Memphis,"  
DONTAYE LEE HARMON,  
aka "Taye,"  
DAMIAN LERON BROWN,  
aka "D,"

**REDACTED**

**aka "DB,"  
aka "Dbrown,"**

**REDACTED**

**and  
JESSICA KNODE, ,**

did knowingly and unlawfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to knowingly, intentionally, and unlawfully distribute and possess with intent to distribute one kilogram or more of a mixture or substance containing heroin, a Schedule I controlled substance, and 280 grams or more of a mixture or substance containing cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

21 U.S.C. § 846.

**REDACTED**

**COUNT TWO**

The Grand Jury for the District of Maryland charges that:

On or about July 31, 2012, in the District of Maryland, the defendant,

**ERNEST LEE HARMON,  
aka "E,"  
aka "Memphis,"**

did knowingly, intentionally, and unlawfully possess with the intent to distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)

**REDACTED**

**COUNT THREE**

The Grand Jury for the District of Maryland charges that:

On or about November 27, 2012, in the District of Maryland, the defendants,

**ERNEST LEE HARMON,  
aka "E,"  
aka "Memphis,"  
and  
DONTAYE LEE HARMON,  
aka "Taye,"**

did knowingly, intentionally, and unlawfully distribute and possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)

18 U.S.C. § 2

**REDACTED**

**COUNT FOUR**

The Grand Jury for the District of Maryland charges that:

On or about May 22, 2013, in the District of Maryland, the defendant,

**ERNEST LEE HARMON,  
aka "E,"  
aka "Memphis,"**

did knowingly, intentionally, and unlawfully distribute and possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)

**REDACTED**

**COUNT FIVE**

The Grand Jury for the District of Maryland charges that:

On or about April 9, 2013, in the District of Maryland, the defendant,

**DAMIAN LERON BROWN,  
aka "D,"  
aka "DB,"  
aka "DBrown,"**

did knowingly, intentionally, and unlawfully distribute and possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)

**REDACTED**

**COUNT SIX**

The Grand Jury for the District of Maryland charges that:

On or about December 12, 2012, in the District of Maryland, the defendants,

**REDACTED**

**and  
DAMIAN LERON BROWN,  
aka "D,"  
aka "DB,"  
aka "DBrown,"**

did knowingly, intentionally, and unlawfully distribute and possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)

18 U.S.C. § 2

**REDACTED**

**COUNT SEVEN**

The Grand Jury for the District of Maryland charges that:

On or about December 18, 2012, in the District of Maryland, the defendant,

**REDACTED**

did knowingly, intentionally, and unlawfully distribute and possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)



**REDACTED**

**FORFEITURE**

1. The allegations contained in Counts 1-7 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841 or 846, the defendants shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the 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, the offenses and all interest and proceeds traceable thereto. The property to be forfeited includes, but is not limited to, the following:

- A 2004 Land Rover truck, bearing Maryland tag number 25115CE, VIN SALME11464A174951, and registered to ERNEST LEE HARMON at 1121 N. Carey Street, Baltimore, Maryland 21217;
- A 1999 Dodge Caravan, bearing Maryland tag number 8AT6793, VIN 1B4GP44G0XB817070, and registered to ERNEST LEE HARMON at 1121 N. Carey Street, Baltimore, Maryland 21217;
- A 2007 Nissan Altima, bearing Maryland tag number 1AG7025, VIN 1N4AL21E87N472922, and registered to JESSICA KNODE at 1636 New Windsor Court, Crofton, Maryland 21114;
- A 2011 Acura TL, bearing Maryland tag number 66730CE, VIN 19UUA6F20BA007650, and registered to Erika Davis at 601 Bywater Road, Annapolis, Maryland 21401;
- A 2010 Porsche Panamera, bearing Maryland tag number 19499CE, VIN WP0AB2A79AL064284, and registered to Niya Blackwell at 302 Zeppelin Avenue, Baltimore, Maryland 21225;

**REDACTED**

- A 2008 Buick Enclave truck, bearing Maryland tag number 8AW6877, VIN 5GAEV23778J103063, and registered to DAMIAN LERON BROWN at 205 Eastern Avenue, Annapolis, Maryland 21403;
- A 2007 Nissan Murano, bearing Maryland tag number 4AX9576, VIN JN8AZ08W07W643382, and registered to DAMIAN LERON BROWN at 205 Eastern Avenue, Annapolis, Maryland 21403; and
- A 2008 Mercedes Benz CL550, bearing Maryland tag number 9AR0406, VIN WDDEJ71X48A016530, and registered to Monica Burnett at 141 Faywood Court, Apt. L, Glen Burnie, Maryland 21060.

**SUBSTITUTE ASSETS**

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendants up to the amount of \$100,000 in street sales of heroin and cocaine over the life of the conspiracy.

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ROD J. ROSENSTEIN  
United States Attorney

A TRUE BILL:

\_\_\_\_\_  
Foreperson

Date: \_\_\_\_\_