

Count One

The Grand Jury for the District of Maryland charges that:

Beginning no later than early 2010, and continuing until the date of this Indictment, in the District of Maryland, the District of New Jersey, the Northern District of California, and elsewhere, the defendants,

**KEREM DAYI,
also known as “Kenny,”
also known as “Cashmir,”
ROBERT RANDALL GLICKMAN,
SCOTT RUSSELL SEGAL,
GABRIEL GONZALEZ,
GOKAHN BERGAL,
STEVEN NEIL MADDEN,
MARTIN DANDY,
PATRICK RUSSO,
RYAN BURTON WHEELER,
ANTHONY CAESAR SANTOIEMMA,
also known as “Bo,”
ANTHONY EVANS OWINGS SEEN,
CHRISTOPHER JOHN GARNER,
FREDERICK BLAIR THOMAS,
SAE HYONG HWANG,
and
CHARLES MICHAEL THOMSON,**

did knowingly and willfully combine, conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury to knowingly, intentionally and unlawfully distribute and possess with the intent to distribute 1000 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a).

21 U.S.C. § 846

Count Two

And the Grand Jury for the District of Maryland further charges that:

Beginning no later than early 2010, and continuing until the date of this Indictment, in the District of Maryland, the District of New Jersey, the Northern District of California, and elsewhere, the defendants,

**KEREM DAYI,
also known as “Kenny,”
also known as “Cashmir,
ROBERT RANDALL GLICKMAN,
SCOTT RUSSELL SEGAL,
GABRIEL GONZALEZ,
GOKAHN BERGAL,
STEVEN NEIL MADDEN,
MARTIN DANDY,
PATRICK RUSSO,
RYAN BURTON WHEELER,
ANTHONY CAESAR SANTOIEMMA,
also known as “Bo,”
ANTHONY EVANS OWINGS SEEN,
CHRISTOPHER JOHN GARNER,
FREDERICK BLAIR THOMAS,
and
SAE HYONG HWANG,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to conduct and attempt to conduct a financial transaction, affecting interstate and foreign commerce, involving proceeds of specified unlawful activity – to wit, conspiracy to distribute controlled substances and distribution of controlled substances, in violation of Title 21, United States Codes, Sections 846 and 841 – with the intent (1) to promote the carrying on of the specified unlawful activity, and (2) knowing that the transaction is designed in whole or in part (a) to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity and (b) to avoid a

transaction reporting requirement under Federal law, in violation of Title 18, United States Code, Section 1956(a)(1)(A) and (B).

18 U.S.C. § 1956(h)

FORFEITURE

1. As a result of the violations of Title 21, United States Code, Section 846 as set forth in Count One of this Indictment, the defendants

KEREM DAYI,
also known as “Kenny,”
also known as “Cashmir;”
ROBERT RANDALL GLICKMAN;
SCOTT RUSSELL SEGAL;
GABRIEL GONZALEZ;
GOKAHN BERGAL;
STEVEN NEIL MADDEN;
MARTIN DANDY;
PATRICK RUSSO;
RYAN BURTON WHEELER;
ANTHONY CAESAR SANTOIEMMA,
also known as “Bo;”
ANTHONY EVANS OWINGS SEEN;
CHRISTOPHER JOHN GARNER;
FREDERICK BLAIR THOMAS;
SAE HYONG HWANG;
and
CHARLES MICHAEL THOMSON,

shall forfeit to the United States any and all property, real and personal, tangible and intangible, as to which property the defendants are jointly and severally liable,

- a. Any property constituting, or derived from, proceeds obtained, directly or indirectly, as the result of the violations of Title 21, United States Code, Section 846, as charged in Count One of this Indictment; and
- b. Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 21, United States Code, Section 846, as charged in this Indictment.

2. Such property shall include, but not be limited to, the following:

a. **Money Judgment.**

A sum of money equal to at least \$10,000,000.00 in United States currency, and all interest and proceeds traceable thereto,¹ representing the amount of proceeds obtained as a result of the conspiracy to violate the Controlled Substances Act, for which each defendant is jointly and severally liable;

b. **Real Estate.**

1. 3435 Liberty Gardens Road, Baltimore, Maryland 21224
Owner: Rhonda L. Madden; Krush NYC, LLC
2. 508 Royal Street, Annapolis, Maryland 21401
Owner: Lannette S. Wheeler
3. 621 Genessee Street, Annapolis, Maryland 21401
Owner: Ryan and Lannette Wheeler
4. 2653 Didelphis Drive, Odenton, Maryland 21113
Owner: Sae Hwang
5. 1305 Hillcrest Road, Glen Burnie, Maryland 21061
Owner: Kenneth Seidelman
6. 2437 Cheyenne Drive, Gambrills, Maryland 21054
Owner: Kerem and Ozlem Dayi
7. 109 Hollywood Avenue, Fairfeild, New Jersey 07004
Owner: Patrick and Renee Russo
8. 494 Clinton Avenue, Newark, New Jersey 07108
Owner: 494 Clinton Avenue Realty, LLC.

¹ The forfeiture amount is based on the gross proceeds realized from the illegal sale of marijuana, cocaine, diverted pharmaceuticals and other controlled substances.

c. **Bank and Financial Institution Accounts:**

#	Bank/Financial	Account No:	Owners/Signatories
1.	Bank of America	0038-1767-4804	Brianna Wright
2.	Bank of America	3810-0487-1404	Brianna Wright
3.	Bank of America	4460-2004-6187	Wheeler Automotive, LLC Lannette S. Wheeler
4.	Bank of America	4460-2496-9309	Gabriel Gonzales
5.	Bank of America	4460-2497-2105	Gabriel Gonzales
6.	Bank of America	488010452642	Robert Randal Glickman (& son)
7.	Bank of America	488013750749	Robert Randal Glickman (& son)
8.	Bank of America	488003637759	Robert Randal Glickman
9.	Bank of America	488003632071	Robert Randal Glickman
10.	Bank of America	009468722624	Gokhan Bergal
11.	Wells Fargo	1010293322979	Kenneth Eng
12.	Wells Fargo	5688394476	Kenneth Eng
13.	Wells Fargo	1010315403857	Scott R. Segal
14.	Wells Fargo	3000254210481	Scott R. Segal
15.	Wells Fargo	5614043528	Kenneth Eng
16.	Wells Fargo	5688394476	Kenneth Eng
17.	Wells Fargo	5867651563	Liana Melnick
18.	Wells Fargo	6019951224	Liana Melnick
19.	Pay Pal Account	1212-6884-7633- 5580-363	Krush NYC, LLC
20.	PNC Bank	5331278675	Krush NYC, LLC
21.	PNC Bank	5331278149	Krush NYC, LLC
22.	M & T Bank	9855297710	Kerem Dayi and Martin Dandy

d. **Personal Property.** The following vehicles:

#	Year	Make	Model	VIN	Registered Owner
1	2006	Toyota	SU	5TDBT48A76S270952	Martin Dandy
2	1998	Ford	Truck	1FMPU18L5WLB06471	Christopher John Garner
3	2008	Infiniti	2 Door	JNKCV64E58M123044	Anthony Santoemma
4	2007	Mercedes	Truck	4JGCB65EX7A040214	Anthony Santoemma
5	2008	Lexus	4 Door	JTHBL46F885071186	Frederick Thomas
6	2005	Jeep	4 Door	1J8HR58225C573119	Scott Segal
7	2002	Honda	Accord	1HGCG22512A013237	Sae Hwang
8	2004	Porsche	Cayenne	WP1AB29P84LA72755	Ozlem Dayi
9	2006	Dodge	Magnum	2D4GV572X6H516605	Martin Dandy
10	2005	Acura	TL; 4 Door	JH4KB16525C020508	Jeffrey Small
11	2005	BMW	4 Door	WBAGN63555DS57730	Thomas Butler Fore
12	2006	BMW	4 Door	WBAVB33586AZ87438	Scott Segal
13	1999	Jeep	Cherokee	1J4GW68N0XC728260	Anthony Seen
14	2005	Nissan	Quest	5N1BV28UX5N119936	Kerem Dayi
15	2008	Toyota	F-J	JTEBU11F48K030491	Lannette Wheeler
16	2007	Cadillac	Escalade	1GYFK66817R339273	Renee Russo
17	2007	Lexus	4 Door	JTHBJ46G572019321	Rebekah Ramirez
18	2006	Volkswgn	Passat	WVWAK93C56P226396	Alexandros Lineberry
19	2011	Dodge	Ram	1D7RV1GT5BS665830	Gokahn Bergal
20	2000	Ford	Mustang	1FAFP42X9YF311447	Anthony Seen
21	2012	Chevy	Truck	1GC1KYE83CF128049	Charles Thomson
22	2012	Trailer		unknown	Charles Thomson
23	2012	BMW	M3	WBSDX9C51CE784780	Gokhan Bergal (leased)
24	2005	Toyota	Scion	JTKDE177350042500	Donald Goodman

3. Inventory and property and assets of businesses known as:

- 1) “The Sixth Boro” located at
494 Clinton Avenue, Jersey City, New Jersey
- 2) “KD’s Kids, Womens and Mens Clothing,” located at
344-346 Martin Luther Boulevard, Jersey City, New Jersey
- 3) Krush, NYC, LLC, located at
8250-D Preston Court, Jessup, Maryland.

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

- 1) cannot be located upon the exercise of due diligence;
- 2) has been transferred or sold to, or deposited with, a third party;

- 3) has been placed beyond the jurisdiction of the Court;
- 4) has been substantially diminished in value; or
- 5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture: \$10,000,000.00.

21 U.S.C. § 853

Rod J. Rosenstein
United States Attorney
District of Maryland

A TRUE BILL:

Foreperson

Date: January _____, 2013