

EXHIBIT A

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Clerk, U.S. District and
Bankruptcy Courts

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on September 15, 2022

UNITED STATES OF AMERICA	:	CRIMINAL NO. 22-MJ-171 (GMH)
	:	
v.	:	
	:	
DEMETRIUS MINOR	:	VIOLATIONS:
and	:	18 U.S.C. § 922(a)(1)(A)
DONALD WILLIS,	:	(Engaging in the Business of Dealing in
	:	Firearms Without a License)
Defendants.	:	18 U.S.C. § 922(a)(5)
	:	(Illegal Interstate Transfer of Firearms)
	:	18 U.S.C. § 922(d)(1)
	:	(Sale of Firearm to Convicted Felon)
	:	18 U.S.C. § 371 (Conspiracy to Commit an
	:	Offense or to Defraud the United States)
	:	
	:	
	:	FORFEITURE: 18 U.S.C. § 924(d),
	:	21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c)
	:	

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Beginning on or about April 6, 2021, and continuing through on or about October 5, 2021, within the District of Columbia and elsewhere, **DEMETRIUS MINOR**, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

(Engaging in the Business of Dealing in Firearms Without a License, in violation of Title 18, United States Code, Section 922(a)(1)(A)).

COUNT TWO

On or about August 19, 2021; August 27, 2021; September 7, 2021; and September 27, 2021, within the District of Columbia, **DEMETRIUS MINOR**, did knowingly transfer, sell, or deliver firearms to **DONALD WILLIS**, knowing or having reasonable belief that **DONALD WILLIS** did not reside in Maryland, where **DEMETRIUS MINOR** resided.

(**Illegal Interstate Transfer of Firearms**, in violation of Title 18, United States Code, Section 922(a)(5)).

COUNT THREE

Between on or about April 6, 2021, and continuing through on or about October 5, 2021, within the District of Columbia, **DEMETRIUS MINOR**, knowingly and intentionally sold or disposed of firearms to **DONALD WILLIS**, knowing or having reasonable belief that **DONALD WILLIS** had been previously convicted of a crime punishable by imprisonment for a term exceeding one year.

(**Sell or Dispose of a Firearm to a Prohibited Person**, in violation of Title 18, United States Code, Section 922(d)(1)).

COUNT FOUR

Between on or about April 6, 2021, to on or about October 5, 2021, within the District of Columbia and elsewhere, **DEMETRIUS MINOR** and **DONALD WILLIS**, along with others known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree together and with other persons, to commit certain offenses against the United States, to wit:

- a. Engaging in interstate travel with the intent to sell or acquire firearms in furtherance of conduct – the business of dealing in firearms – constituting a violation of Title 18, United States Code, Sections 922(a)(1)(A) & 924(n);

- b. Transferring, selling, giving, transporting, and delivering firearms to person not residing in the State where the transferor resides, in violation of Title 18, United States Code, Sections 922(a)(5) & 924(a)(1)(D); and
- c. Knowingly and intentionally selling or disposing of firearms to a person knowing or having a reasonable belief that the person had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d)(1) & 924(a)(8).

GOAL OF THE CONSPIRACY

The goal of the conspiracy was to obtain firearms from licensed firearms dealers in Maryland and to transfer and transport these firearms to the District of Columbia and elsewhere, for the purpose of illegally reselling these firearms for profit to individuals otherwise unable to legally acquire firearms.

ROLES OF CONSPIRATORS

It was part of the conspiracy that the defendants and their other conspirators would and did play different roles in the conspiracy. Some of the roles assumed by conspirators, known and unknown to the grand jury, include straw purchasers, consumers, firearms supplier, organizer, intermediary, holder, and reseller. **DEMETRIUS MINOR** and **DONALD WILLIS** at some point or another, occupied many of these roles, including purchasing firearms with the intent to distribute them.

Some Relevant Definitions

A straw purchaser is an individual who is legally permitted to purchase firearms. Straw purchasers acquire firearms at a licensed firearm dealer by signing a document affirming that they are the intended owner and transferee of the firearm. After acquiring a firearm, the straw purchaser

transfers and/or sells the firearm to individuals who otherwise would be unable to purchase or acquire firearms.

A reseller sells firearms for profit on behalf of the conspiracy, to individuals who are otherwise unable to legally acquire firearms because of their prior convictions or because of the laws of their State or District.

A conspiracy may have multiple conspirators who occupy different distinct roles of the conspiracy or may involve two or more persons who conspire to obtain and resell firearms for profit.

MANNER AND MEANS TO ACCOMPLISH THE CONSPIRACY

The manner and means by which the conspiracy was carried out included the following:

- a. It was part of the conspiracy that beginning on or about April 6, 2021, and continuing through at least October 5, 2021, **DEMETRIUS MINOR** engaged in a pattern of purchasing firearms from licensed dealers in the State of Maryland.
 - i. Between April 6, 2021, and April 16, 2021, **DEMETRIUS MINOR** purchased (1) a Taurus 9mm PT111 G2A, 9mm pistol bearing serial number ACA475492, (2) a Glock 19X, 9mm pistol bearing serial number BTDV743, and (3) a Glock 17 Gen 5, 9mm pistol bearing serial number BTBG105 from Engage Armament, located in Rockville, Maryland.
 - ii. On May 11, 2021, **DEMETRIUS MINOR** purchased (1) a Glock 26, 9mm pistol bearing serial number BSMB754, and (2) a Glock 43, 9mm pistol bearing serial number AFFN936 from Engage Armament, located in Rockville, Maryland.
 - iii. On June 5, 2021, **DEMETRIUS MINOR** purchased (1) a Glock 26, 9mm pistol bearing serial number BTEX642, (2) a Glock 27 Gen 3, .40 caliber pistol bearing

serial number BTFD468, and (3) a Glock 43, 9mm pistol bearing serial number AEXZ257 from Engage Armament, located in Rockville, Maryland.

- iv. On June 9, 2021, **DEMETRIUS MINOR** purchased (1) a Taurus G3C, 9mm pistol bearing serial number ACB520645, (2) a Pioneer Arms Corp Hellpup, 7.62x39 pistol bearing serial number PAC1150019, and (3) a Taurus G3, 9mm pistol bearing serial number ACA456782 from Engage Armament, located in Rockville, Maryland.
- v. On June 19, 2021, **DEMETRIUS MINOR** purchased a Glock 17 Gen 5, 9mm pistol bearing serial number BTNB564 from Engage Armament, located in Rockville, Maryland.
- vi. On July 16, 2021, **DEMETRIUS MINOR** purchased a Springfield Armory XD-9, 9mm pistol bearing serial number BY499104 from Engage Armament, located in Rockville, Maryland.
- vii. On July 24, 2021, **DEMETRIUS MINOR** purchased a Taurus G3, 9mm pistol bearing serial number ABK980872 from Engage Armament, located in Rockville, Maryland.
- viii. On July 28, 2021, **DEMETRIUS MINOR** purchased (1) a Ruger 57, 5.7x28mm pistol bearing serial number 641-71586, and (2) a Glock 20SF, 10mm pistol bearing serial number BSRA376 from Engage Armament, located in Rockville, Maryland.
- ix. On August 4, 2021, **DEMETRIUS MINOR** purchased a Taurus G2C, 9mm pistol bearing serial number 1C050673 from Atlantic Guns, located in Rockville, Maryland.

- x. On August 6, 2021, **DEMETRIUS MINOR** purchased (1) a Ruger 57, 5.7x28 mm pistol bearing serial number 641-75252, (2) a Glock 31 Gen 3, .357 sig pistol bearing serial number BNWB953, (3) a Glock 29 Gen 4, 10mm pistol bearing serial number BSRR171; and (4) a Springfield Armory Hellcat, 9mm pistol bearing serial number BYS589829 from Engage Armament, located in Rockville, Maryland.
- xi. On August 13, 2021, **DEMETRIUS MINOR** purchased (1) a Springfield XDS 45, .45 caliber pistol bearing serial number XS679933 from United Gun Shop, located in Rockville, Maryland, and (2) a Taurus G3, 9mm pistol bearing serial number ACG067178 from Atlantic Guns, located in Rockville, Maryland.
- xii. On August 14, 2021, **DEMETRIUS MINOR** purchased a Glock 19X, 9mm pistol bearing serial number BTYW081 from Atlantic Guns, located in Rockville, Maryland.
- xiii. On August 17, 2021, **DEMETRIUS MINOR** purchased a Glock 23, 9mm pistol bearing serial number VCU219 from United Gun Shop, located in Rockville, Maryland.
- xiv. On August 21, 2021, **DEMETRIUS MINOR** purchased a Century Arms Draco, 7.62x39 pistol bearing serial number 21PF-8378 from United Gun Shop, located in Rockville, Maryland.
- xv. On August 26, 2021, **DEMETRIUS MINOR** purchased (1) a Taurus PT111 G2A, 9mm pistol bearing serial number ACD763836, and (2) a Taurus G2S, 9mm pistol bearing serial number ACD835962, from Engage Armament, located in Rockville, Maryland.

- xvi. On August 28, 2021, **DEMETRIUS MINOR** purchased a Glock 48, 9mm pistol bearing serial number BSTW539, from Engage Armament, located in Rockville, Maryland.
 - xvii. On September 15, 2021, **DEMETRIUS MINOR** purchased a Glock 43X, 9mm pistol bearing serial number BUEH697 from Engage Armament, located in Rockville, Maryland.
 - xviii. On October 5, 2021, **DEMETRIUS MINOR** purchased (1) a Century Arms Draco, 7.62x39 pistol bearing serial number SV7P004515, and (2) a Glock 23, .40 caliber pistol bearing serial number CFH856 from United Gun Shop, located in Rockville, Maryland.
- b. It was further part of the conspiracy that beginning on or about April 6, 2021, and continuing through at least October 5, 2021, **DEMETRIUS MINOR** and **DONALD WILLIS** agreed to engage in financial transactions to trade firearms in exchange for money, traveling over state lines to complete the transactions. It was further part of the conspiracy that **DEMETRIUS MINOR** traveled interstate with firearms in order to sell firearms to **DONALD WILLIS**, an out of state resident. Both **DEMETRIUS MINOR** and **DONALD WILLIS** are unlicensed firearms dealers. **DONALD WILLIS** is also a person previously convicted of multiple crimes punishable by a term of imprisonment exceeding one year and had knowledge of that fact (as of April 2021).
- c. The firearms traded include those listed above, and specifically, that **DEMETRIUS MINOR** and **DONALD WILLIS** met in Washington, D.C. on or about August 19, 2021; August 27, 2021; September 7, 2021; and September 27, 2021, to transfer firearms

previously purchased by **DEMETRIUS MINOR** to **DONALD WILLIS** in exchange for money.

OVER ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of the conspiracy, and in order to effect the objects thereof, **DEMETRIUS MINOR** and **DONALD WILLIS**, and others known and unknown to the Grand Jury, in various combinations, directly and indirectly, within the District of Columbia and elsewhere, committed overt acts, including, but not limited to, the following:

a. Between on or about April 6, 2021, and continuing through at least October 5, 2021,

DEMETRIUS MINOR purchased multiple firearms in the State of Maryland, including:

- i. Between April 6, 2021 and April 16, 2021, **DEMETRIUS MINOR** purchased (1) a Taurus 9mm PT111 G2A, 9mm pistol bearing serial number ACA475492, (2) a Glock 19X, 9mm pistol bearing serial number BTDV743, and (3) a Glock 17 Gen 5, 9mm pistol bearing serial number BTBG105 from Engage Armament, located in Rockville, Maryland.
- ii. On May 11, 2021, **DEMETRIUS MINOR** purchased (1) a Glock 26, 9mm pistol bearing serial number BSMB754, and (2) a Glock 43, 9mm pistol bearing serial number AFFN936 from Engage Armament, located in Rockville, Maryland
- iii. On June 5, 2021, **DEMETRIUS MINOR** purchased (1) a Glock 26, 9mm pistol bearing serial number BTEX642, (2) a Glock 27 Gen 3, .40 caliber pistol bearing serial number BTFD468, and (3) a Glock 43, 9mm pistol bearing serial number AEXZ257 from Engage Armament, located in Rockville, Maryland.

- iv. On June 9, 2021, **DEMETRIUS MINOR** purchased (1) a Taurus G3C, 9mm pistol bearing serial number ACB520645, (2) a Pioneer Arms Corp Hellpup, 7.62x39 pistol bearing serial number PAC1150019, and (3) a Taurus G3, 9mm pistol bearing serial number ACA456782 from Engage Armament, located in Rockville, Maryland.
- v. On June 19, 2021, **DEMETRIUS MINOR** purchased a Glock 17 Gen 5, 9mm pistol bearing serial number BTNB564 from Engage Armament, located in Rockville, Maryland.
- vi. On July 16, 2021, **DEMETRIUS MINOR** purchased a Springfield Armory XD-9, 9mm pistol bearing serial number BY499104 from Engage Armament, located in Rockville, Maryland.
- vii. On July 24, 2021, **DEMETRIUS MINOR** purchased a Taurus G3, 9mm pistol bearing serial number ABK980872 from Engage Armament, located in Rockville, Maryland.
- viii. On July 28, 2021, **DEMETRIUS MINOR** purchased (1) a Ruger 57, 5.7x28mm pistol bearing serial number 641-71586, and (2) a Glock 20SF, 10mm pistol bearing serial number BSRA376 from Engage Armament, located in Rockville, Maryland.
- ix. On August 4, 2021, **DEMETRIUS MINOR** purchased a Taurus G2C, 9mm pistol bearing serial number 1C050673 from Atlantic Guns, located in Rockville, Maryland.
- x. On August 6, 2021, **DEMETRIUS MINOR** purchased (1) a Ruger 57, 5.7x28 mm pistol bearing serial number 641-75252, (2) a Glock 31 Gen 3,

- .357 sig pistol bearing serial number BNWB953, (3) a Glock 29 Gen 4, 10mm pistol bearing serial number BSRR171; and (4) a Springfield Armory Hellcat, 9mm pistol bearing serial number BYS589829 from Engage Armament, located in Rockville, Maryland.
- xi. On August 13, 2021, **DEMETRIUS MINOR** purchased (1) a Springfield XDS 45, .45 caliber pistol bearing serial number XS679933 from United Gun Shop, located in Rockville, Maryland, and (2) a Taurus G3, 9mm pistol bearing serial number ACG067178 from Atlantic Guns, located in Rockville, Maryland.
 - xii. On August 14, 2021, **DEMETRIUS MINOR** purchased a Glock 19X, 9mm pistol bearing serial number BTYW081 from Atlantic Guns, located in Rockville, Maryland.
 - xiii. On August 17, 2021, **DEMETRIUS MINOR** purchased a Glock 23, 9mm pistol bearing serial number VCU219 from United Gun Shop, located in Rockville, Maryland.
 - xiv. On August 21, 2021, **DEMETRIUS MINOR** purchased a Century Arms Draco, 7.62x39 pistol bearing serial number 21PF-8378 from United Gun Shop, located in Rockville, Maryland.
 - xv. On August 26, 2021, **DEMETRIUS MINOR** purchased (1) a Taurus PT111 G2A, 9mm pistol bearing serial number ACD763836, and (2) a Taurus G2S, 9mm pistol bearing serial number ACD835962, from Engage Armament, located in Rockville, Maryland.

- xvi. On August 28, 2021, **DEMETRIUS MINOR** purchased a Glock 48, 9mm pistol bearing serial number BSTW539, from Engage Armament, located in Rockville, Maryland.
- xvii. On September 15, 2021, **DEMETRIUS MINOR** purchased a Glock 43X, 9mm pistol bearing serial number BUEH697 from Engage Armament, located in Rockville, Maryland.
- xviii. On October 5, 2021, **DEMETRIUS MINOR** purchased (1) a Century Arms Draco, 7.62x39 pistol bearing serial number SV7P004515, and (2) a Glock 23, .40 caliber pistol bearing serial number CFH856 from United Gun Shop, located in Rockville, Maryland.
- b. Between on or about June 25, 2021, and July 30, 2021, **DONALD WILLIS** would utilize his mobile device (“cell phone”) to communicate with prospective purchasers of firearms;
- c. Between August 29, 2021, and September 15, 2021, **DONALD WILLIS** and **DEMETRIUS MINOR** would utilize their mobile devices (“cell phones”) to communicate about meeting up to transfer firearms;
- d. Between on or about April 6, 2021, and October 5, 2021, **DEMETRIUS MINOR** agreed to sell multiple firearms to **DONALD WILLIS** in exchange for U.S. currency;
- e. Between on or about April 6, 2021, and October 5, 2021, **DEMETRIUS MINOR** knowingly sold or disposed of firearms to **DONALD WILLIS** while having a reasonable belief that **DONALD WILLIS** had previously been convicted of a crime punishable by imprisonment for a term exceeding one year;

- f. On or about September 25, 2021, **DONALD WILLIS** attempted to provide **DEMETRIUS MINOR** with U.S. currency in exchange for firearms by using a mobile app called "Cash App";
- g. On or about September 25, 2021, **DEMETRIUS MINOR** requested U.S. currency from **DONALD WILLIS** as payment for firearms purchased for **DONALD WILLIS**;
- h. On or about August 19, 2021, **DEMETRIUS MINOR** and **DONALD WILLIS** met, in person, in order to transfer firearms from **DEMETRIUS MINOR** to **DONALD WILLIS** within the District of Columbia;
- i. On or about August 27, 2021, **DEMETRIUS MINOR** and **DONALD WILLIS** met in person in order to transfer firearms from **DEMETRIUS MINOR** to **DONALD WILLIS** within the District of Columbia;
- j. On or about September 7, 2021, **DEMETRIUS MINOR** and **DONALD WILLIS** met in person in order to transfer firearms from **DEMETRIUS MINOR** to **DONALD WILLIS** within the District of Columbia;
- k. On or about September 27, 2021, **DEMETRIUS MINOR** and **DONALD WILLIS** met in person in order to transfer firearms from **DEMETRIUS MINOR** to **DONALD WILLIS** within the District of Columbia.

(Conspiracy to Commit and Offense or to Defraud the United States, in violation of Title 18, United States Code, Section 371).

FORFEITURE ALLEGATION

1. Upon conviction of any of the offenses alleged in Count One, Count Two, Count Three, or Count Four of this Indictment, **DEMETRIUS MINOR** and **DONALD WILLIS**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the

willful commission of these offenses, including but not limited to the firearms listed below in Paragraph Three of this Forfeiture Allegation.

2. Upon conviction of the offense alleged in Count Four of this Indictment, **DEMETRIUS MINOR** and **DONALD WILLIS**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the knowing commission of the offense, including but not limited to the firearms listed below in Paragraph Three of this Forfeiture Allegation.

3. Upon conviction of any of the offenses alleged in this Indictment, **DEMETRIUS MINOR** and **DONALD WILLIS**, shall forfeit to the United States, Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), the following specific property:

- (a) Taurus 9mm PT111 G2A, 9mm pistol bearing serial number ACA475492;
- (b) Glock 19X, 9mm pistol bearing serial number BTDV743;
- (c) Glock 17 Gen 5, 9mm pistol bearing serial number BTBG105;
- (d) Glock 26, 9mm pistol bearing serial number BSMB754;
- (e) Glock 43, 9mm pistol bearing serial number AFFN936;
- (f) Glock 26, 9mm pistol bearing serial number BTEX642;
- (g) Glock 27 Gen 3, .40 caliber pistol bearing serial number BTFD468;
- (h) Glock 43, 9mm pistol bearing serial number AEXZ257;
- (i) Taurus G3C, 9mm pistol bearing serial number ACB520645;
- (j) Pioneer Arms Corp Hellpup, 7.62x39 pistol bearing serial number PAC1150019;
- (k) Taurus G3, 9mm pistol bearing serial number ACA456782;
- (l) Glock 17 Gen 5, 9mm pistol bearing serial number BTNB564;
- (m) Springfield Armory XD-9, 9mm pistol bearing serial number BY499104;
- (n) Taurus G3, 9mm pistol bearing serial number ABK980872;
- (o) Ruger 57, 5.7x28mm pistol bearing serial number 641-71586;
- (p) Glock 20SF, 10mm pistol bearing serial number BSRA376;
- (q) Taurus G2C, 9mm pistol bearing serial number 1C050673;
- (r) Ruger 57, 5.7x28 mm pistol bearing serial number 641-75252;
- (s) Glock 31 Gen 3, .357 sig pistol bearing serial number BNWB953;
- (t) Glock 29 Gen 4, 10mm pistol bearing serial number BSRR171;
- (u) Springfield Armory Hellcat, 9mm pistol bearing serial number BYS589829;
- (v) Springfield XDS 45, .45 caliber pistol bearing serial number XS679933;
- (w) Taurus G3, 9mm pistol bearing serial number ACG067178;

- (x) Glock 19X, 9mm pistol bearing serial number BTYW081;
- (y) Glock 23, 9mm pistol bearing serial number VCU219;
- (z) Century Arms Draco, 7.62x39 pistol bearing serial number 21PF-8378;
- (aa) Taurus PT111 G2A, 9mm pistol bearing serial number ACD763836;
- (bb) Taurus G2S, 9mm pistol bearing serial number ACD835962;
- (cc) Glock 48, 9mm pistol bearing serial number BSTW539;
- (dd) Glock 43X, 9mm pistol bearing serial number BUEH697;
- (ee) Century Arms Draco, 7.62x39 pistol bearing serial number SV7P004515;
- (ff) Glock 23, .40 caliber pistol bearing serial number CFH856

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

- (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 that cannot be subdivided without difficulty;

the defendants shall forfeit to the United States any other property of the defendants, up to the value of the property described above, pursuant to Title 21, United States Code, Section 853(p).

(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c)).

A TRUE BILL:

FOREPERSON.

Matthew M. Groves / GPR

Attorney of the United States in
and for the District of Columbia.