

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

DAREN JAMES REID,

Defendant.

Criminal No. 1:21-CR- 0006

STATEMENT OF FACTS

The United States and the defendant, Daren James Reid, agree that the following facts are true and correct, and that had this matter proceeded to trial, the United States would have proven them beyond a reasonable doubt with admissible and credible evidence:

1. From in and about August 2012 to on or about September 9, 2020, in the Eastern District of Virginia and elsewhere, the defendant, Daren James Reid, unlawfully, knowingly, and intentionally distributed, and possessed with intent to distribute, oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. The defendant was personally involved in the distribution of, and possession with intent to distribute of, oxycodone totaling a weight of between 3,000 kilograms and 10,000 kilograms of marijuana (Level 32).

3. The defendant sold oxycodone, in various weights, on numerous dark net markets, including Silk Road, Apollon, and Wall Street under the monikers "Oxyflight" and "Imperial Royalty." The defendant also sold oxycodone using an encrypted email address, under the moniker "Imperial Royalty." On each of the dark net markets, the defendant had a seller's profile that marketed various oxycodone strengths and their prices. The defendant would receive

payment in bitcoin for the oxycodone. The defendant would then mail the oxycodone pills using the United States Postal Service (“USPS”).

4. The defendant sold oxycodone to an undercover law enforcement officer (hereinafter, “UC”) on four occasions, as follows:

- a. In January 2020, the defendant arranged to sell 24 oxycodone 30mg pills under the moniker Imperial Royalty on the Apollon marketplace. The defendant received a \$780 payment in bitcoin. The defendant mailed the pills to Alexandria, Virginia, within the Eastern District of Virginia. The pills were wrapped in a blue napkin, the napkin was inside tin foil, secured by tiger print duct tape, packaged in a black mylar ziplock bag, followed by a yellow padded envelope, before finally being placed in a USPS Priority Mail envelope. The packaging was such as to avoid law enforcement detection of the pills.
- b. In February 2020, the defendant arranged to sell 22 oxycodone 30mg pills under the moniker Imperial Royalty using an encrypted email address. The defendant received a \$700 payment in bitcoin. The defendant mailed the pills to Alexandria, Virginia, within the Eastern District of Virginia. The pills were wrapped in a napkin, secured with black duct tape with multi-colored stripes, then packaged in a black Mylar style zip lock bag, followed by a yellow padded envelope before finally being placed in the USPS Priority Mail envelope. The packaging was such as to avoid law enforcement detection of the pills.
- c. In March 2020, the defendant arranged to sell 25 oxycodone 30mg pills under the moniker Imperial Royalty using an encrypted email address. The defendant received a \$790 payment in bitcoin. The defendant mailed the pills to Alexandria, Virginia, within the Eastern District of Virginia. The pills were

wrapped in a napkin, secured with purple duct tape, then packaged in a black Mylar style zip lock bag, followed by a yellow padded envelope before finally being placed in the USPS Priority Mail envelope. The packaging was such as to avoid law enforcement detection of the pills.

- d. In May 2020, the defendant arranged to sell 25 oxycodone 30mg pills under the moniker Imperial Royalty using an encrypted email address. The defendant received a \$665 payment in bitcoin. The defendant mailed the pills to Alexandria, Virginia, within the Eastern District of Virginia. The pills were wrapped in a napkin, secured with black duct tape with multi-colored stripes, then packaged in a black Mylar style zip lock bag, followed by a yellow padded envelope before finally being placed in the USPS Priority Mail envelope. The packaging was such as to avoid law enforcement detection of the pills.

5. On May 28, 2020, the defendant shipped 30 pills of oxycodone to a buyer located in Illinois. The pills were wrapped and taped with purple tape, then packaged in a black Mylar style zip lock bag, followed by a yellow padded envelope before finally being placed in the USPS Priority Mail envelope. The packaging was such as to avoid law enforcement detection of the pills.

6. The defendant sold oxycodone on the dark web, in at least the following amounts:

<u>Dark Web</u>			
<u>Platform</u>	<u>Moniker</u>	<u>Pill Type</u>	<u>Pills Sold</u>
Apollon	Imperial Royalty	Oxy 80mg	30
Apollon	Imperial Royalty	Oxy 15mg	50
Apollon	Imperial Royalty	Oxy 30mg	30
Apollon	Imperial Royalty	Oxy 60mg	5
Wall Street	Imperial Royalty	Oxy 30mg	903
Silk Road	Oxyflight	Oxy 30mg	11425
Silk Road	Oxyflight	Oxy 30mg	550
Silk Road	Oxyflight	Oxy 30mg	200
Silk Road	Oxyflight	Oxy 15mg	422

Silk Road	Oxyflight	Oxy 60mg	24
Silk Road	Oxyflight	Oxy 80mg	347

7. On September 9, 2020, inside a storage locker in Florida, the defendant possessed with intent to distribute over 1 kilogram of oxycodone, morphine, and other pills.

8. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.


9. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

10. If the defendant breaches the plea agreement, then pursuant to the plea agreement, he waives any rights under Federal Rule of Criminal Procedure 11(f), Federal Rule of Evidence 410, the United States Constitution, and any federal statute or rule in objecting to the admissibility of the statement of facts in any such proceeding.

Respectfully submitted,

Raj Parekh
Acting United States Attorney

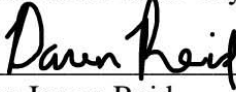
By:



Karolina Klyuchnikova
Special Assistant United States Attorney

Defendant's signature: After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Daren James Reid, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial the United States would have proved the same beyond a reasonable doubt.


Date: Feb. 9, 2021



Daren James Reid
Defendant

Defense counsel signature: I am the defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: Feb. 9, 2021



Ann Rigby, Esq.
Attorney for the Defendant