

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Holding a Criminal Term

Grand Jury Sworn in on September 15, 2023

UNITED STATES OF AMERICA	:	CRIMINAL CASE NO.
	:	
v.	:	MAGISTRATE CASE NO. 24-MJ-121
	:	
KANARD BISHOP,	:	VIOLATIONS:
KHALIL BOYD,	:	18 U.S.C. § 1951
also known as “Kahlil BOYD” and “Lil	:	(Conspiracy to Interfere with Interstate
Bill,”	:	Commerce by Robbery)
EDWARD LEROY BROWN,	:	18 U.S.C. § 1951
also known as “Shiesty,” and	:	(Interference with Interstate Commerce by
	:	Robbery)
Defendants.	:	18 U.S.C. § 2119
	:	(Carjacking)
	:	18 U.S.C. § 924(c)(1)(A)(ii)
	:	(Using, Carrying, Possessing, and
	:	Brandishing a Firearm in Furtherance of a
	:	Crime of Violence)
	:	18 U.S.C. § 2
	:	(Aiding and Abetting)
	:	
	:	FORFEITURE:
	:	18 U.S.C. § 924(d) and § 981(a)(1)(C);
	:	21 U.S.C. § 853(a), (p); and 28 U.S.C. §
	:	2461(c)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Beginning on or about February 14, 2024, and continuing through at least on or about March 28, 2024, within the District of Columbia, the State of Maryland, and elsewhere, **KANARD BISHOP, EDWARD LEROY BROWN**, also known as “Shiesty,” and **KHALIL BOYD**, also known as “Kahlil Boyd” and “Lil Bill,” and co-conspirators not indicted herein, who are known

and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other to commit an offense against the United States, namely, to knowingly and unlawfully obstruct, delay, and affect interstate commerce by robbery in violation of Title 18, United States Code, Section 1951, by agreeing to take United States currency and other items of value (including prescription narcotics and cellular telephones) from retail stores and commercial vehicles by means of actual and threatened force, violence, and fear of injury, immediate and future, to another person, thereby affecting commerce and the movement of articles and commodities in commerce, in violation of Title 18, United States Code, Section 1951(a).

Goal of the Conspiracy

It was the goal of the conspiracy that the conspirators would acquire money and items of value, by way of robbery, belonging to and in the care, custody, control, management, and possession of various retail and commercial establishments and vehicles.

The Manner and Means Used to Achieve the Objectives of the Conspiracy

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

1. It was part of the conspiracy that the defendants would and did play different roles in the conspiracy, took upon themselves different tasks, and participated in the conduct of the conspiracy through various criminal acts.
2. The co-conspirators would work together to arrange for a vehicle to be used to commit the robberies, either by carjacking a vehicle or arranging the use of an associate's vehicle.
3. Then, the conspirators would use either a carjacked vehicle or another vehicle at their disposal to arrive at the location of the commercial establishment or commercial vehicle.
4. During each robbery, the co-conspirators would brandish a firearm and demand property from the employees inside the commercial establishment or commercial vehicle.

5. After each robbery or attempted robbery, the co-conspirators would flee from the commercial establishment or commercial vehicle by driving off in a carjacked vehicle or an associate's vehicle.

Overt Acts in Furtherance of the Conspiracy

In furtherance of the conspiracy, and to affect the objects thereof, the co-conspirators and others, both known and unknown to the Grand Jury, committed, or caused to be committed, the following overt acts in the District of Columbia and elsewhere.

1. On or about March 17, 2024, members of the conspiracy drove to the area of 4316 Southern Avenue SE, Washington, D.C. in a white Acura SUV. While wearing masks and displaying firearms, members of the conspiracy demanded that D.P. hand over the keys to his 2008 Black Mercedes Benz and exit the vehicle. The co-conspirators also robbed both D.P. and his associate of their belongings, which included wallets, cellphones, currency, and jewelry. The co-conspirators then fled in the carjacked 2008 Black Mercedes Benz and the white Acura SUV.

2. On or about March 18, 2024, members of the conspiracy drove to a 7-11 located at 3218 Pennsylvania Avenue SE, Washington, D.C. in the stolen 2008 Black Mercedes Benz. While wearing masks covering their faces, the co-conspirators approached the doors of the 7-11 and peered inside. Upon observing a marked police cruiser nearby, the co-conspirators got back into the stolen black Mercedes and fled the scene.

3. Between March 18, 2024 and March 20, 2024, members of the conspiracy abandoned the stolen 2008 Black Mercedes Benz in the rear of 430 37th Place SE, Washington, D.C.

4. On or about March 20, 2024, members of the conspiracy drove the white Acura to 20 35th Street NE, Washington, D.C. While displaying firearms, members of the conspiracy

demanded J.S.'s vehicle, a 2018 white Dodge Durango with black racing stripes, and J.S.'s belongings. The co-conspirators then fled in the carjacked 2018 white Dodge Durango with black racing stripes and the white Acura SUV.

5. On or about March 20, 2024, members of the conspiracy drove the stolen 2018 white Dodge Durango with black racing stripes to the Denny's Restaurant at 4445 Benning Road NE, Washington D.C. While displaying firearms, members of the conspiracy demanded the employees at Denny's hand over money from the register. When the employees were unable to open the register, one co-conspirator ripped the register off the counter and fled. The co-conspirators then fled in the stolen 2018 white Dodge Durango with black racing stripes.

6. Between March 20, 2024 and March 22, 2024, members of the conspiracy abandoned the stolen 2018 white Dodge Durango with black racing stripes in the area of 5109 Southern Avenue, Capitol Heights, Prince George's County, Maryland.

7. On or about March 27, 2024, members of the conspiracy drove the white Acura SUV to the area of 2000 Brooks Drive, District Heights, Prince George's County, Maryland. While displaying firearms, members of the conspiracy demanded R.W.'s vehicle, a 2022 purple Dodge Challenger, and R.W.'s belongings. The co-conspirators then fled in the carjacked 2022 purple Dodge Challenger and the white Acura SUV.

8. On or about March 27, 2024, members of the conspiracy drove the carjacked 2022 purple Dodge Challenger to the area of 2718 Ely Place SE, Washington, D.C.

9. On or about March 27, 2024, members of the conspiracy drove the white Acura SUV to a used tire shop at 4862 Marlboro Pike, Capitol Heights, Maryland. While wearing masks covering their faces, the co-conspirators entered the used tire store, which was empty. After walking around for a short while, the co-conspirators left the area in the white Acura SUV.

10. On or about March 27, 2024, members of the conspiracy drove the white Acura SUV to the intersection of Burns Street SE and G Street SE, Washington, D.C. and approached two employees of FedEx, a business operating in interstate commerce, as they were working in the FedEx truck. While wearing masks covering their faces, **KANARD BISHOP** and a co-conspirator pointed firearms at two employees both demanding the employees' belongings and taking packages from inside the FedEx truck. **KANARD BISHOP** and the co-conspirator then re-entered the white Acura SUV, which was being driven by a third co-conspirator. The co-conspirators then fled the area.

11. On or about March 27, 2024, members of the conspiracy drove the white Acura SUV to the rear parking lot of 411 Ridge Road SE, Washington, D.C. and discarded the boxes from the stolen FedEx packages in a nearby dumpster.

12. On or about March 28, 2024, **KANARD BISHOP**, **EDWARD LEROY BROWN**, also known as "Shiesty," and **KHALIL BOYD**, also known as "Kahlil Boyd" and "Lil Bill," drove the carjacked 2022 purple Dodge Challenger to a GameStop store located 5706 Silver Hill Road, District Heights, Prince George's County, Maryland. **KANARD BISHOP** and **EDWARD LEROY BROWN**, also known as "Shiesty," attempted to rob the store but were stopped when police intervened. **KHALIL BOYD**, also known as "Kahlil Boyd" and "Lil Bill," drove away in the carjacked 2022 purple Dodge Challenger and into Washington, D.C.

(**Conspiracy to Interfere with Interstate Commerce by Robbery**, in violation of Title 18, United States Code, Section 1951)

COUNT TWO

On or about March 17, 2024, in the District of Columbia and elsewhere, **KANARD BISHOP**, took a motor vehicle, to wit: a 2008 black Mercedes Benz bearing a Virginia license plate, that had been transported, shipped, and received in interstate and foreign commerce, from

and in the presence of D.P., by force, violence, and intimidation, with the intent to cause death and serious bodily harm.

(**Carjacking**, in violation of Title 18, United States Code, Section 2119)

COUNT THREE

On or about March 17, 2024, in the District of Columbia and elsewhere, **KANARD BISHOP**, did unlawfully and knowingly use, carry, and brandish, during and in relation to, and did possess in furtherance of, a crime of violence for which he may be prosecuted in a court of the United States, that is, Carjacking, as charged in Count Two of this Indictment, which is incorporated herein, a firearm.

(**Using, Carrying, Possessing, and Brandishing a Firearm During a Crime of Violence**, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii))

COUNT FOUR

On or about March 20, 2024, in the District of Columbia and elsewhere, **KANARD BISHOP**, took a motor vehicle, to wit: a white 2018 Dodge Durango with black racing stripes bearing a Maryland license plate, that had been transported, shipped, and received in interstate and foreign commerce, from and in the presence of J.S., by force, violence, and intimidation, with the intent to cause death and serious bodily harm.

(**Carjacking**, in violation of Title 18, United States Code, Section 2119)

COUNT FIVE

On or about March 20, 2024, in the District of Columbia and elsewhere, **KANARD BISHOP**, did unlawfully and knowingly use, carry, and brandish, during and in relation to, and did possess in furtherance of, a crime of violence for which he may be prosecuted in a court of the United States, that is, Carjacking, as charged in Count Four of this Indictment, which is incorporated herein, a firearm.

(Using, Carrying, Possessing, and Brandishing a Firearm During a Crime of Violence, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii))

COUNT SIX

On or about March 20, 2024, in the District of Columbia and elsewhere, **KANARD BISHOP**, did unlawfully obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant and a co-conspirator did unlawfully take and obtain property consisting of a Denny's cash register and currency located at the Denny's Restaurant at 4445 Benning Road NE, Washington, D.C., from the presence of employees, and against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, while the employees were engaged in commercial activities as employees of Denny's, a business that was engaged in and that affects interstate commerce.

(Interference with Commerce by Robbery, in violation of Title 18, United States Code, Section 1951)

COUNT SEVEN

On or about March 20, 2024, in the District of Columbia and elsewhere, **KANARD BISHOP**, did unlawfully and knowingly use, carry, and brandish, during and in relation to, and did possess in furtherance of, a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Interstate Commerce by Robbery, as charged in Count Six of this Indictment, which is incorporated herein, a firearm.

(Using, Carrying, Possessing, and Brandishing a Firearm During a Crime of Violence, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii))

COUNT EIGHT

On or about March 20, 2024, in the District of Columbia and elsewhere, **KANARD BISHOP**, took a motor vehicle, to wit: a purple 2022 Dodge Challenger bearing a District of Columbia license plate, that had been transported, shipped, and received in interstate and foreign commerce, from and in the presence of R.W., by force, violence, and intimidation, with the intent to cause death and serious bodily harm.

(**Carjacking**, in violation of Title 18, United States Code, Section 2119)

COUNT NINE

On or about March 20, 2024, in the District of Columbia and elsewhere, **KANARD BISHOP**, did unlawfully and knowingly use, carry, and brandish, during and in relation to, and did possess in furtherance of, a crime of violence for which he may be prosecuted in a court of the United States, that is, Carjacking, as charged in Count Eight of this Indictment, which is incorporated herein, a firearm.

(**Using, Carrying, Possessing, and Brandishing a Firearm During a Crime of Violence**, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii))

COUNT TEN

On or about March 27, 2024, in the District of Columbia and elsewhere, **KANARD BISHOP**, did unlawfully obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that they did unlawfully take and obtain, property consisting of packages from a FedEx truck located at the intersection of Burns Street SE and G Street SE, Washington, D.C., from the presence of employees, and against their will by means of actual and threatened force, violence,

and fear of injury, immediate and future, to their persons, while the employees were engaged in commercial activities as employees of FedEx, a business that was engaged in and that affects interstate commerce.

(Interference with Commerce by Robbery, in violation of Title 18, United States Code, Section 1951)

COUNT ELEVEN

On or about March 27, 2024, in the District of Columbia and elsewhere, **KANARD BISHOP**, did unlawfully and knowingly use, carry, and brandish, during and in relation to, and did possess in furtherance of, a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Interstate Commerce by Robbery, as charged in Count Ten of this Indictment, which is incorporated herein, a firearm.

(Using, Carrying, Possessing, and Brandishing a Firearm During a Crime of Violence, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii))

COUNT TWELVE

On or about March 28, 2024, in the District of Columbia and elsewhere, **KANARD BISHOP, EDWARD LEROY BROWN**, also known as “Shiesty,” and **KHALIL BOYD**, also known as “Kahlil Boyd” and “Lil Bill,” did unlawfully obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain, and attempt to take and obtain, currency from a GameStop store located at 5706 Silver Hill Road, District Heights, Prince George’s County, Maryland, from the presence of employees, and against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons,

while the employees were engaged in commercial activities as employees of GameStop, a business that was engaged in and that affects interstate commerce.

(Interference with Commerce by Robbery and Aiding and Abetting, in violation of Title 18, United States Code, Sections 1951, and 2)

COUNT THIRTEEN

On or about March 28, 2024, in the District of Columbia and elsewhere, **KHALIL BOYD**, also known as “Kahlil Boyd” and “Lil Bill,” took a motor vehicle, to wit: a 2013 Nissan Rogue bearing a Maryland license plate, that had been transported, shipped, and received in interstate and foreign commerce, from and in the presence of M.T., by force, violence, and intimidation, with the intent to cause death and serious bodily harm.

(Carjacking, in violation of Title 18, United States Code, Section 2119)

COUNT FOURTEEN

On or about March 28, 2024, within the District of Columbia and elsewhere, **KHALIL BOYD**, also known as “Kahlil Boyd” and “Lil Bill,” did unlawfully and knowingly use, carry, and brandish, during and in relation to, and did possess in furtherance of, a crime of violence, for which he may be prosecuted in a court of the United States, that is, Carjacking, as charged in Count Thirteen of this Indictment, which is incorporated herein, a firearm.

(Using, Carrying, Possessing, and Brandishing a Firearm During a Crime of Violence, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii))

FORFEITURE ALLEGATION

1. Upon conviction of a violation of Title 18, United States Code, Sections 1951 or 2119 as charged in this Indictment, the defendants shall forfeit to the United States any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of these violations, pursuant to Title 18, United States Code, Section

982(a)(5) and Title 28, United States Code, Section 2461(c). The United States will also seek a forfeiture money judgment against the defendants equal to the value of any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of these violations. constitutes or is derived from proceeds traceable to these offenses.

2. Upon conviction of a violation of Title 18, United States Code, Section 924(c)(1)(A)(ii), as charged in this Indictment, the defendants 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: a black semi-automatic .40 caliber Glock 22 handgun (serial number BVKX619) and ammunition; a dark green and black .40 caliber semi-automatic handgun with a Polymer 80 receiver frame and a Glock slide (serial number BXH281) and ammunition; and a black .40 caliber Glock 23C (serial number DTB357) and ammunition.

3. Upon conviction of any of a violation of Title 18, United States Code, Section 924(c)(1)(A)(ii), as charged in this Indictment, the defendants shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to these offenses, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c). The United States will also seek a forfeiture money judgment against the defendants equal to the value of any property, real or personal, which constitutes or is derived from proceeds traceable to these offenses.

5. If any of the property described above as being 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 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, Sections 981(a)(1)(C), 982(a)(5), 3665, and 924(d)); and Title 28, United States Code, Section 2461(c))

A TRUE BILL:

FOREPERSON.

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