



distribute methydone, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

WAYS, MANNER, AND MEANS TO ACCOMPLISH THE CONSPIRACY

The primary purpose of the conspiracy was to make as much money as possible through the distribution of methydone in the Fairfax County, Virginia area of the Eastern District of Virginia, and elsewhere. The ways, manner and means by which this purpose was carried out included the following:

1. It was part of the conspiracy that conspirators played different roles, took upon themselves different tasks, and participated in the affairs of the conspiracy through various criminal acts.
2. It was further part of the conspiracy that conspirators obtained methydone from a supplier located in China.
3. It was further part of the conspiracy that conspirators distributed the methydone, with the goal of making as much money as possible by selling methydone in the Fairfax County, Virginia area.
4. It was further part of the conspiracy that conspirators met at locations around Fairfax County and elsewhere to engage in methydone transactions.
5. It was further part of the conspiracy that conspirators derived money and other benefits from the unlawful activities of the conspiracy.
6. It was further part of the conspiracy that conspirators used telephones, Facebook, and AOL Instant Messenger to facilitate their drug trafficking activities.
7. It was further part of the conspiracy that conspirators remitted money to a supplier in China via wire services.

8. It was further part of the conspiracy that conspirators used various methods to conceal the conspiracy and their unlawful drug distribution activities in order to ensure the continued existence and success of the conspiracy.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the defendant committed overt acts in the Eastern District of Virginia and elsewhere, including, but not limited to, the following:

1. In and around summer 2011, JOSHUA LEONARD MALINOWSKI CLOUGHERTY provided MATTHEW SCOTT BAKER with the contact information for the supplier in China from whom CLOUGHERTY had been purchasing and from whom BAKER subsequently purchased methylene.
2. In and around late 2011, in Fairfax County, within the Eastern District of Virginia, SHELBY SINES NEAL bought approximately two ounces of methylene every other week from MATTHEW SCOTT BAKER on a consignment basis, which NEAL further distributed.
3. In and around 2012, in Fairfax County, within the Eastern District of Virginia, SHELBY SINES NEAL bought approximately four ounces of methylene every other week from MATTHEW SCOTT BAKER on a consignment basis, which NEAL further distributed.
4. On or about January 25, 2012, in Reston, Virginia, within the Eastern District of Virginia, SHELBY SINES NEAL possessed approximately one (1) pound of methylene.
5. In and around early 2012, in Fairfax County, Virginia, within the Eastern District of Virginia, KYLE BENJAMIN GRISWOLD purchased approximately one (1) ounce of methylene from MATTHEW SCOTT BAKER for approximately \$500 in U.S. currency for further distribution.

6. In and around early February 2012, MATTHEW SCOTT BAKER distributed approximately 1,444.88 grams of methylene to Sajad Safdari.

7. On or about February 10, 2012, in Fairfax, Virginia, within the Eastern District of Virginia, MATTHEW SCOTT BAKER distributed approximately 66 grams of methylene to an undercover Fairfax County Police detective ("UC-1") in exchange for approximately \$1,600 in U.S. currency.

8. On or about February 29, 2012, in Fairfax, Virginia, within the Eastern District of Virginia, MATTHEW SCOTT BAKER distributed approximately four (4) ounces of methylene to UC-1 in exchange for approximately \$2,000 in U.S. currency.

9. On or about March 22, 2012, in Chantilly, Virginia, within the Eastern District of Virginia, JOSHUA LEONARD MALINOWSKI CLOUGHERTY distributed approximately four (4) ounces of methylene to UC-1 in exchange for \$2,000 in U.S. currency.

10. On or about April 17, 2012, in Fairfax County, Virginia, within the Eastern District of Virginia, KYLE BENJAMIN GRISWOLD stored approximately eight (8) ounces of methylene at his residence

11. On or about April 17, 2012, in Fairfax County, Virginia, within the Eastern District of Virginia, MATTHEW SCOTT BAKER distributed approximately eight (8) ounces of methylene to UC-1 in exchange for \$3,800 in U.S. currency.

12. On or about February 8, 2012, in Fairfax County, Virginia, within the Eastern District of Virginia, ETHAN PAUL WALKER distributed approximately two (2) grams of methylene to an undercover Fairfax County Police detective ("UC-2") in exchange for approximately \$180 in U.S. currency.

13. On or about February 15, 2012, in Fairfax County, Virginia, within the Eastern District of Virginia, ETHAN PAUL WALKER distributed approximately five (5) grams of methylene and five capsules of mescaline to UC-2 in exchange for approximately \$580 in U.S. currency.

14. On or about March 29, 2012, in Fairfax County, Virginia, within the Eastern District of Virginia, ETHAN PAUL WALKER possessed approximately seven (7) grams of methylene that he intended to distribute to UC-2 in exchange for \$450 in U.S. currency.

15. On or about March 29, 2012, in Fairfax County, Virginia, within the Eastern District of Virginia, ETHAN PAUL WALKER possessed approximately 14 grams of methylene at his residence.

(All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.)

COUNT 2  
(Possessing a Firearm in Furtherance of a Drug Trafficking Crime)  
(Baker)

THE GRAND JURY CHARGES THAT:

On or about May 3, 2012, in Fairfax, Virginia, within the Eastern District of Virginia, defendant, MATTHEW SCOTT BAKER, did knowingly and unlawfully possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to-wit: conspiracy to distribute methylene, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, as set forth in Count One of this Indictment, which descriptions of said drug trafficking crime is realleged and incorporated by reference as if set forth in full herein.

(In violation of Title 18, United States Code, Section 924(c)(1)(A).)

**FORFEITURE NOTICE**

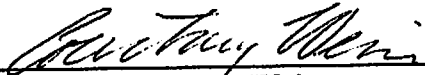
Pursuant to Federal Rule of Criminal Procedure 32.2(a), the defendant is hereby notified that:

1. If any defendant is convicted of committing any of the controlled substance offenses alleged in Count 1 (conspiracy to distribute methyldone, in violation of 21 U.S.C. §§ 841 (a)(1) and 846), the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853, all proceeds obtained from the violation of Count 1, including, but not limited to, a money judgment in the sum of \$1,800,000, to be held joint and severally liable among convicted co-defendants, representing the total proceeds from the drug offenses, as well as any and all property used and intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count 1 of this Indictment.

**APPROVED**  
Pursuant to the E-Filed Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.

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Foreperson

Neil H. MacBride  
United States Attorney

By:   
Courtney L. Weiner  
Special Assistant United States Attorney