

**SEALED**

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS <b>FILED</b> <div style="border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;">JUN 23 2020</div> U.S. DISTRICT COURT By _____ Deputy
---

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

**ORIGINAL**

UNITED STATES OF AMERICA  
v  
AARON BREWER

**3-20CR0295-M**

CRIMINAL NO.

**FILED UNDER SEALED**

INDICTMENT

The Grand Jury Charges:

**Introduction**

At all times material to this indictment:

1. The “deep web” is the portion of the Internet not indexed by search engines, such as internal networks belonging to private industry, government agencies, or academic institutions. The “dark web” is a portion of the deep web that has been intentionally hidden and is inaccessible through standard web browsers.
2. To access the dark web, individuals must use specialized software to access content and websites. Within the dark web, criminal marketplaces operate, allowing individuals to buy and sell illegal items, such as drugs, firearms, and other hazardous materials, with greater anonymity than is possible on the traditional Internet (sometimes called the “clear web” or simply the “web”). These online market websites use a variety of encryption technologies to ensure that communications and transactions are shielded from interception

and monitoring. The sites operate similarly to clear web commercial websites such as Amazon or eBay, but offer illicit goods and services.

3. “Vendors” are the dark web’s sellers of goods and services, often of an illicit nature, and they do so through the creation and operation of “vendor accounts” on dark web marketplaces (DWMs). Customers, meanwhile, operate “customer accounts.” Vendor and customer accounts are not identified by numbers, but rather monikers or “handles,” much like the username a person would use on a clear web site.

4. If a moniker on a particular marketplace has not already been registered by another user, vendors and customers can use the same moniker across multiple marketplaces, and based on seller and customer reviews, can become well known as “trusted” vendors or customers. It is possible for the same person to operate multiple customer accounts and multiple vendor accounts at the same time.

5. Utilizing the dark web, **Aaron Brewer**, the defendant, created vendor accounts on DWMs, in order to sell cocaine, heroin, and other controlled substances, in the Northern District of Texas and elsewhere.

6. These DWMs served to facilitate the illegal commerce conducted on the site, by concealing the identities and locations of the customers and **Brewer**.

7. Beginning in or around June of 2019, **Brewer** distributed cocaine, heroin, and other controlled substances on DWMs to various customers across the United States. Customers who ordered cocaine, heroin, and other controlled substances on DWMs from **Brewer** paid for their purchases by transferring cryptocurrency, usually bitcoin, from their DWM customer accounts to one of **Brewer’s** vendor accounts. **Brewer** would then ship cocaine,

heroin, and other controlled substances directly to an address provided by the customers (often times alias), through interstate commerce utilizing the U.S. Mail and other shipping services.

Count One

Conspiracy to Possess With Intent to Distribute a Controlled Substance  
(Violation of 21 U.S.C. § 846)

8. The Grand Jury realleges and incorporates by reference the allegations contained in paragraphs one through seven of this indictment, as if fully set forth herein.

9. Beginning in or around June 2019, and continuing thereafter, until in or around April 2020, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Aaron Brewer**, did knowingly and intentionally combine, conspire, confederate, and agree with others both known and unknown to the Grand Jury to commit the following offenses against the United States:

a. to distribute and possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B);

b. to distribute and possess with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

All in violation of 21 U.S.C. § 846.

Count Two

Distribution of a Controlled Substance  
(Violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B))

10. The Grand Jury realleges and incorporates by reference the allegation contained in paragraphs one through nine of this indictment, as if fully set forth herein.

11. On or about March 28, 2020, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Aaron Brewer**, did knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule I controlled substance.

In violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B).

Forfeiture Notice  
(21 U.S.C. § 853(a))

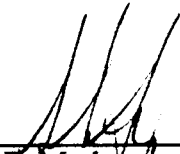
12. Upon conviction for any of the offenses alleged in Counts One and Two of this indictment and pursuant to 21 U.S.C. § 853(a), the defendant, **Aaron Brewer**, shall forfeit to the United States of America any property constituting or derived from proceeds obtained, directly or indirectly, as a result of the respective offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the respective offense.

13. If any property subject to forfeiture, as a result of the offenses alleged in Counts One and Two of this Indictment, for which the defendant is convicted, cannot be located upon exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which can't be divided without difficulty, it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant, up to the value of the property subject to forfeiture.

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

ERIN NEALY COX  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
Sid P. Mody  
Assistant United States Attorney  
State Bar No. 24072791  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699  
Email: [siddharth.mody@usdoj.gov](mailto:siddharth.mody@usdoj.gov)

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

---

THE UNITED STATES OF AMERICA

v

AARON BREWER

---

INDICTMENT

21 U.S.C. § 846

Conspiracy to Possess With Intent to Distribute a Controlled Substance  
(Count 1)

21 U.S.C. § 841(a)(1) and (b)(1)(B))  
Distribution of a Controlled Substance  
(Count 2)

21 U.S.C. § 853(a)  
Forfeiture Notice

2 Counts

---

A true bill rendered



---

DALLAS

FOREPERSON

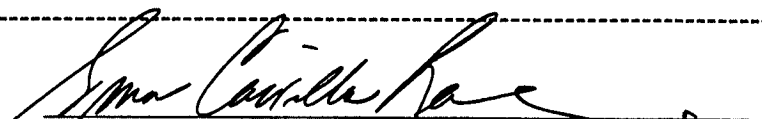
---

Filed in open court this 23<sup>rd</sup> day of June, 2020.

---

Warrant to be Issued

---

  
UNITED STATES MAGISTRATE JUDGE  
No Criminal Matter Pending