

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

**SEP - 7 2023**

**U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 BRANDON ADAMS, )  
 )  
 Defendant. )

**4:23-cr-00481 MTS**

**INFORMATION**

The United States Attorney charges that:

**BACKGROUND**

At all times material to this Indictment:

1. The “dark web,” or “Darknet,” is a portion of the “deep web” of the Internet, where individuals must use an anonymizing software or application 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”). “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. Customers, meanwhile, operate “customer accounts.” Vendor and customer accounts are not identified by numbers, but rather monikers or “handles,” much like the username one would use on a clear web site. 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 also

possible for the same person to operate multiple customer accounts and multiple vendor accounts at the same time.

2. Wickr Me is a messaging application that can be installed onto a cellular device, computer, or other electronic device. The application allows for the exchange of end-to-end encrypted and content-expiring messages, including text, photo, and video. The application does not require users to provide anything other than a username and password upon registration, and therefore, communications can occur anonymously. Messages sent and received through Wickr Me are encrypted locally on the user's device and each message requires a separate key to unlock, and therefore decipher, the content.

3. Cryptocurrency, a type of virtual currency, is a decentralized, peer-to-peer, network-based medium of value or exchange that may be used as a substitute for fiat currency to buy goods or services or exchanged for fiat currency or other cryptocurrencies. Examples of cryptocurrency are Bitcoin, Litecoin, and Ether. Cryptocurrency can exist digitally on the Internet, in an electronic storage device, or in cloud-based servers. Although not usually stored in any physical form, public and private keys used to transfer cryptocurrency from one person or place to another can be printed or written on a piece of paper or other tangible object. Cryptocurrency can be exchanged directly person to person, through a cryptocurrency exchange, or through other intermediaries. Generally, cryptocurrency is not issued by any government, bank, or company; it is instead generated and controlled through computer software operating on a decentralized peer-to-peer network. Most cryptocurrencies have a "blockchain," which is a distributed public ledger, run by the decentralized network, containing an immutable and historical record of every transaction. Cryptocurrency is not illegal in the United States.

4. Cryptocurrency is stored in a virtual account called a wallet. Wallets are software programs that interface with blockchains and generate and/or store public and private keys used to send and receive cryptocurrency. A public key or address is akin to a bank account number, and a private key is akin to a PIN number or password that allows a user the ability to access and transfer value associated with the public address or key. To conduct transactions on a blockchain, an individual must use the public address (or “public key”) and the private address (or “private key”). A public address is represented as a case-sensitive string of letters and numbers, 26–35 characters long. Each public address is controlled and/or accessed through the use of a unique corresponding private key—the cryptographic equivalent of a password or PIN—needed to access the address. Only the holder of an address’s private key can authorize any transfers of cryptocurrency from that address to another cryptocurrency address.

5. Bitcoin (“BTC”) is a type of cryptocurrency.<sup>1</sup> Payments or transfers of value made with bitcoin are recorded in the Bitcoin blockchain and thus are not maintained by any single administrator or entity. Individuals can acquire bitcoin through exchanges (i.e., online companies which allow individuals to purchase or sell cryptocurrencies in exchange for fiat currencies or other cryptocurrencies), bitcoin ATMs, or directly from other people. It is also possible to earn bitcoin by verifying other users’ transactions, a process known as “mining.” Even though the public addresses of those engaging in cryptocurrency transactions are recorded on a blockchain, the identities of the individuals or entities behind the public addresses are not recorded on these public ledgers. If, however, an individual or entity is linked to a public address, it may be possible to

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<sup>1</sup> Since Bitcoin is both a currency and a protocol, capitalization differs. Uppercase Bitcoin will denote protocol, software, and community whereas lowercase bitcoin will denote units of the currency.

determine what transactions were conducted by that individual or entity. Bitcoin transactions are therefore sometimes described as “pseudonymous,” meaning that they are partially anonymous. And while it’s not completely anonymous, bitcoin allows users to transfer funds more anonymously than would be possible through traditional banking and financial systems. To transfer bitcoin to another address, the payor transmits a transaction announcement, cryptographically signed with the payor's private key, across the peer-to-peer Bitcoin network. The Bitcoin address of the receiving party and the sender's private key are the only pieces of information needed to complete the transaction. These two keys by themselves rarely reflect any identifying information. As a result, little-to-no personally identifiable information about the payor or payee is transmitted in a Bitcoin transaction itself. Once the payor's transaction announcement is verified, the transaction is added to the blockchain, a decentralized public ledger that records all Bitcoin transactions. The blockchain logs every Bitcoin address that has ever received a bitcoin and maintains records of every transaction for each Bitcoin address.

6. Virtual currency administrators and exchangers, including an individual exchanger operating as a business, are considered money services businesses. Bitcoin “exchangers” and “exchanges” are individuals or companies that exchange bitcoin for other currencies, including U.S. dollars. To acquire bitcoin, a typical user will purchase them from a Bitcoin “exchanger.” Bitcoin exchangers generally accept payments of fiat currency (currency that derives its value from government regulation or law), or other convertible virtual currencies. When a user wishes to purchase bitcoin from an exchanger, the user will typically send payment in the form of fiat currency, often via bank wire or ACH, or other convertible virtual currency to an exchanger, for the corresponding quantity of bitcoin, based on a fluctuating exchange rate. The exchanger, usually

for a commission, will then either sell the user bitcoin from the exchange's reserves or will attempt to broker the purchase with another user who is trying to sell bitcoin. The purchased bitcoin are then transferred to the purchaser's Bitcoin address, allowing the user to conduct transactions with other Bitcoin users via the Internet.

7. Under the Federal Food, Drug, and Cosmetic Act (FDCA), Title 21, United States Code, Sections 301 et seq., the term “drug” includes any article intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease in man or animals, or an article (other than food) intended to affect the structure or function of the body of man or other animals. 21 USC § 321(g)(1).

8. Alprazolam is a benzodiazepine used to treat anxiety disorders. Alprazolam is assigned to Schedule IV of the Controlled Substances Act and is available only by prescription. Pfizer Pharmaceuticals markets its pills containing alprazolam under the brand name Xanax. Several companies sell generic versions of Xanax. These generic versions are stamped with identifying numbers such as, “B707” supplied by Breckenridge Pharmaceutical, Inc., “2090” supplied by Qualitest Pharmaceutical, Inc., and “S903” supplied by Dava Pharmaceutical, Inc. Bromazolam and clonazolam are both benzodiazepine derivatives that are not scheduled substances. Neither are ingredients in Xanax. All of the substances mentioned in the above paragraph meet the statutory definition of drug.

9. The introduction or delivery for introduction into interstate commerce of any misbranded drug is prohibited. 21 USC § 321(a). Misbranding encompasses dispensing without a valid prescription a drug intended for use by man which, because of its toxicity or potential harmful effect, was not safe for use except under supervision of a licensed practitioner or where

its FDA-approved application limited it to prescription use. 21 USC § 353 (b)(1). Misbranding also occurs when the drug was manufactured, prepared, propagated, compounded, or processed in an establishment not registered with the Secretary of Health and Human Services. 21 USC § 352(o).

**COUNT I**

10. Beginning in October 2019 and continuing until May 2021, in the Eastern District of Missouri, Central District of Florida, Southern District of Ohio, Western District of New York and elsewhere,

**BRANDON ADAMS,**

the defendant herein, did knowingly and unlawfully combine, conspire, agree, and confederate together with L.L., C.B., E.E., M.P., J.C., M.V., and G.F. and other persons, both known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled substance and amphetamine (Adderall), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), including through delivering, distributing or dispensing of said controlled substances by means of the Internet, in violation of Title 21, United States Code, Section 841(h)(1).

All in violation of Title 21, United States Code, Section 846 and punishable under Title 21, United States Code, Section 841(b)(2).

**COUNT II**

The United States Attorney further charges that:

11. The allegations contained in paragraphs 1 through 9 are realleged as if set forth fully.

12. Beginning in October 2019 and continuing until May 2021, in the Eastern District of Missouri, Central District of Florida, Southern District of Ohio, Western District of New York and elsewhere,

**BRANDON ADAMS,**

the defendant herein, did knowingly, and unlawfully combine, conspire, agree, and confederate together with L.L., C.B., E.E., G.F., J.C., M.P. and M.V. and with persons, both known and unknown to this Grand Jury, with the intent to defraud and mislead,

- a) misbranded, in violation of Title 21, United States Code, Section 331(b);
- b) caused the introduction of misbranded drugs into interstate commerce, in violation of Title 21, United States Code, Sections 331(a); and
- c) sold a counterfeit drug, in violation of Title 21, United States Code, Section 331(i)(3).

MANNER AND MEANS OF THE CONSPIRACY

13. It was part of the conspiracy that BRANDON ADAMS operated as a vendor of counterfeit pharmaceuticals on the Darknet using the moniker “BenzoBoys.” ADAMS primarily sold counterfeit and generic equivalents of Xanax, both with alprazolam and with bromazolam or clonazepam.

14. It was further part of the conspiracy that ADAMS obtained a pill press machine capable of forming pills from dry components with a production rate of 16,200 pills per hour. ADAMS also obtained imprint stamps that are substantially indistinguishable from marks used by pharmaceutical companies selling generic forms of Xanax as referenced above. These imprints, combined with the appropriate color, shape, and size of pill, mimicked legitimate product so as to

deceive, cause confusion or mistake.

15. It was further part of the drug-trafficking conspiracy that, between January 27, 2020, and March 6, 2021, ADAMS purchased approximately 700 pounds of pill binder from an online website and arranged for the pill binder to be delivered to ADAMS' apartment in Sullivan, Missouri, on some occasions, and to C.B.'s residence in Gerald, Missouri, on other occasions. In total, more than 500 pounds of pill binder was received by C.B.. Thereafter, ADAMS and C.B. transferred the pill binder to defendant ADAMS' cabin in Sullivan, Missouri, where the pill press machine was located.

16. It was further part of the conspiracy that ADAMS obtained alprazolam, bromazolam, and clonazolam (active ingredients) by mail from sources in China.

17. It was further part of the conspiracy that ADAMS, L.L. and C.B., at various times used pill binder, active ingredients, and the pill press to make counterfeit and misbranded pills to fulfill online orders being made through "BenzoBoys." The conspirators used imprint stamps with the pill press that are substantially indistinguishable from marks assigned by the National Drug Code to pharmaceutical companies selling generic forms of Xanax.

18. Usually ADAMS communicated with customers through Wickr Me. Customers placed orders through Wickr Me and usually made payment to defendant by Bitcoin cryptocurrency. Having received payment, ADAMS would deliver his processed pills either by mail or by dropping them at a previously determined "dead drop" sites to be later collected by the customer. E.E. would at times deliver the packages to various post offices for mailing at ADAMS' direction. In total ADAMS sold millions of pills.

19. It was further part of the conspiracy that, between May 2019 and July 2021,



ADAMS, using the moniker “BenzoBoys” sold bulk quantities of misbranded pills to G.F., who resides in the State of Florida.

20. It was further part of the conspiracy that, between November 2019 and June 2021, ADAMS, using the moniker “BenzoBoys” sold bulk quantities of misbranded pills to defendant J.C., who resides in the State of New York.

21. It was further part of the drug-trafficking conspiracy that, between October 2019 and July 8, 2021, ADAMS, using the moniker “BenzoBoys” sold bulk quantities of misbranded pills to defendant M.P., who resides in the State of Ohio.

22. It was further part of the drug-trafficking conspiracy that, between 2020 and June 2021 ADAMS, using the moniker “BenzoBoys” sold bulk quantities of misbranded pills to M.V., who resides in the State of Washington.

**OVERT ACTS**

23. **G.F.**

a. On or about October 23, 2020, “Alphamanbearpig” messaged defendant via Dread with G.F.’s address order 30,000 counterfeit and misbranded pills.

b. On or about October 24, 2020, “Alphamanbearpig” sent monero in the amount of approximately \$9,000 as payment for counterfeit and misbranded drugs.

c. On November 3, 2020, defendant mailed two Priority Mail packages containing counterfeit and misbranded drugs to the address previously provided by “Alphamanbearpig.”

d. On November 6, 2020, defendant mailed a Priority Mail package containing counterfeit and misbranded drugs to the address previously provided by “Alphamanbearpig.”

e. On November 6, 7, and 9, 2020, G.F. received the packages sent to him by defendant on November 3 and 6, 2020.

f. On or about November 20, 2020, “Alphamanbearpig” messaged defendant via Dread with G.F.’s address ordering 30,000 counterfeit and misbranded pills.

g. On or about November 20, 2020, “Alphamanbearpig” sent monero in the amount of approximately \$9,000 as payment for counterfeit and misbranded drugs.

h. On November 23, 2020, defendant mailed two Priority Mail packages containing counterfeit and misbranded drugs to the address previously provided by “Alphamanbearpig.”

i. On November 28, 2020, G.F. received the packages sent to him by defendant on November 3 and 6, 2020.

j. On or about April 17, 2021, “Alphamanbearpig” sent monero in the amount of approximately \$9,000 as payment for counterfeit and misbranded drugs.

k. On or about April 18, 2021, “Alphamanbearpig” messaged defendant via Dread with G.F.’s address with an order for 30,000 counterfeit and misbranded pills.

l. On April 27, 2021, defendant mailed two Priority Mail packages containing counterfeit and misbranded drugs to the address previously provided by “Alphamanbearpig.”

m. On April 29, 2021, defendant mailed a Priority Mail package containing counterfeit and misbranded drugs to the address previously provided by “Alphamanbearpig.”

n. On April 30, 2021, G.F. received the packages sent to him by defendant on April 27, 2021.

o. On May 3, 2021, G.F. received the package sent to him by defendant on

April 29, 2021.

p. On July 15, 2021, “Alphamanbearpig” responded “ayy thnx. I’ll see when my drop is available” after receiving a Wickr Me message from “BenzoBoys,” (operated by law enforcement) that “I’ve got a 30k pack I’m going to drop you.”

q. On or about July 20, 2021, G.F. accepted the package believed to contain counterfeit and misbranded drugs.

r. On or about July 20, 2021, at approximately 3:09pm, after accepting the package, G.F. took a photograph of the package.

s. On or about July 20, 2021, at approximately 3:30pm, “Alphamanbearpig” sent a message via Wickr Me to the “BenzoBoys” saying “I just know ti[sic] landed and what it looks like :)”

t. On or about July 21, 2021, “Alphamanbearpig” sent a message via Wickr Me to the “BenzoBoys” that he believed his “drop got burnt, delivered and haven’t heard from my the drop.”

24. **J.C.**

a. On or about August 11, 2020, “Fortunecookiez” messaged defendant via Wickr Me and provided a Bitcoin transaction hash confirming a transfer of approximately \$17,000.00 as payment for counterfeit and misbranded drugs along with instructions to mail the counterfeit and misbranded drugs to J.C. at 10 Alpine St. #25, Rochester, NY.

b. On or about August 13, 2020, defendant mailed two Priority Mail packages containing counterfeit and misbranded drugs to the address previously provided by “Fortunecookiez.”

c. On or about August 17, 2020, J.C. received the packages sent to him by defendant on August 13, 2020.

d. On or about October 24, 2020, approximately \$16,000.00 in bitcoin was sent to defendant from the same bitcoin wallet address used by “Fortunecookiez” on or about August 17, 2020 as payment for counterfeit and misbranded drugs.

e. On or about October 27, 2020, “Fortunecookiez” messaged defendant via Wickr Me and provided an address for J.C. at 10 Alpine St., #25, Rochester, NY.

f. On or about November 3, 2020, defendant mailed two Priority Mail packages containing counterfeit and misbranded drugs to the address previously provided by “Fortunecookiez.”

g. On November 6 and 7, 2020, J.C. received the packages sent to him by defendant on November 3, 2020.

h. On or about January 25, 2021, “Fortunecookiez” sent messages to “BenzoBoys” via Wickr Me stating, “lets do 80k white and like 120k blue 70k can like be yellows mailed” and “or i’ll try to get enough money for another kilo to get 90k greens before its CNY.”

i. On or about June 21, 2021, “Fortunecookiez” received Wickr Me messages from “BenzoBoys” stating, “i know it’s late but I should have the rest of your order ready for pickup. does saturday work?” and “ok if Saturday works for you let me know a time you’re aiming for. we can get it narrowed down in a few days.”

j. On or about June 21, 2021, “Fortunecookiez” sent messages to “BenzoBoys” via Wickr Me stating, “what city am I from. just not used to the small texts. wanna be sure im talking to the og.” “BenzoBoys” responded, “Rochester.” “Fortunecookiez” then

continued to communicate with “BenzoBoys.”

25. M.P.

a. On or about August 25, 2020, M.P. ordered 100,000 counterfeit and misbranded drugs from defendant, requesting that they be sent to an address in the 4300 block of Curundu Avenue, Dayton, Ohio 45416.

b. On or about August 25, 2020, M.P. sent 2.73009977 bitcoin (equivalent to approximately \$30,887) to defendant as payment for counterfeit and misbranded drugs ordered that day.

c. On or about August 31, 2020, defendant mailed three Priority Mail packages containing counterfeit and misbranded drugs to the address provided by M.P.

d. On or about September 3 and 4, 2020, M.P. received the packages containing counterfeit and misbranded drugs sent by defendant on August 31, 2020.

e. On or about September 3, 2020, defendant mailed three Priority Mail packages containing counterfeit and misbranded drugs to the address previously provided by M.P.

f. On or about September 8, 2020, M.P. received the packages containing counterfeit and misbranded drugs sent by defendant on September 3, 2020.

g. On or about September 10, 2020, defendant mailed three Priority Mail packages containing counterfeit and misbranded drugs to the address previously provided by M.P.

h. On or about September 14, 2020, M.P. received the packages containing counterfeit and misbranded drugs sent by defendant on September 10, 2020.

i. On or about September 21, 2020, defendant mailed a Priority Mail package containing counterfeit and misbranded drugs to the address previously provided by M.P.

j. On or about September 24, 2020, M.P. received the package containing counterfeit and misbranded drugs sent by defendant on September 21, 2020.

k. On or about May 22, 2021, M.P. provided an address in the 4300 block of Curundu Avenue, Dayton, Ohio 45416 to defendant with the request that packages containing counterfeit and misbranded drugs be sent to that address.

l. On or about June 8, 2021, M.P., communicating via Wickr Me, ordered 200,000 counterfeit and misbranded drugs for the price of \$60,000 from the Wickr Me account “BenzoBoys.”

m. On or about June 27, 2021, M.P. directed D.C. to a location in the Meramec State Park, provided to M.P. via Wickr Me, at which D.C. could pick up the order of 200,000 counterfeit and misbranded drugs.

26. M.V.

a. On or about January 1, 2020, M.V., using the moniker “Packlord206” on Wickr Me, ordered 10,000 pills of counterfeit and misbranded drugs from defendant and requested that they be shipped to M.V.’s alias “Vlad Klovov” at an address in Seattle, Washington.

b. On or about January 1, 2020, M.V. sent 0.49328457 bitcoin, valued at the time at approximately \$3,539.65, to defendant as payment for counterfeit and misbranded drugs ordered that day.

c. On or about January 2, 2020, defendant mailed a Priority Mail Express package containing counterfeit and misbranded drugs from a post office in the Eastern District of Missouri to M.V.

d. On or about January 3, 2020, M.V. received a package containing

counterfeit and misbranded drugs sent by defendant.

e. On or about May 27, 2020, M.V., using the moniker “Packlord206” on Wickr Me, ordered 60,000 counterfeit and misbranded drugs from defendant and asked that they be shipped to M.V.’s alias “Vlad Klovov” and “Ivan Verbowski” at addresses in Seattle, Washington.

f. On or about May 28, 2020, M.V. sent 1.63310722 bitcoin, valued at the time at approximately \$15,016.78, to defendant as payment for counterfeit and misbranded drugs.

g. On or about June 5, 2020, M.V., using the moniker “Packlord206” on Wickr Me, ordered 60,000 counterfeit and misbranded drugs from defendant and asked that they be shipped to M.V.’s alias “Vlad Klovov” and “Ivan Verbowski” at addresses in Seattle, Washington.

h. On or about June 5, 2020, M.V. sent 1.56328501 bitcoin, valued at the time at approximately \$15,150.70, to defendant as payment for counterfeit and misbranded drugs ordered that day.

i. On or about June 12, 2020, M.V. sent 0.52803154 bitcoin, valued at the time at approximately \$4,993.64, to defendant as payment for counterfeit and misbranded drugs.

j. On or about June 13, 2020, defendant mailed three Priority Mail packages containing counterfeit and misbranded drugs from a post office in the Eastern District of Missouri to M.V. in Seattle, Washington.

k. On or about June 16, 2020, M.V. received three packages containing counterfeit and misbranded drugs sent by defendant.

l. On or about June 19, 2020, defendant mailed two Priority Mail packages containing counterfeit and misbranded drugs from a post office in the Eastern District of Missouri

to M.V. in Seattle, Washington.

m. On or about June 22, 2020, M.V. received two packages mailed on or about June 19, 2020, containing counterfeit and misbranded drugs sent by defendant.

All in violation of Title 18, United States Code, Section 371.

**COUNT III**

The United States Attorney further charges that:

27. The allegations contained in paragraphs 1 through 26 are realleged as if set forth fully.

28. Beginning in October 2019 and continuing until May 2021, in the Eastern District of Missouri and elsewhere,

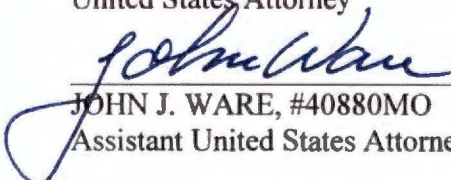
**BRANDON ADAMS,**

the defendant herein, did knowingly cause the sale and dispensing of counterfeit drugs, specifically by soliciting and completing the purchase and delivery of pills containing unscheduled chemical substances, including bromazolam and clonazolam, where such pills were manufactured with marks, imprints and other distinguishing features so as to make them appear to be pills legitimately manufactured by pharmaceutical companies.

In violation of Title 21, United States Code, Section 331(i)(3), and punishable under Title 21, United States Code, Section 333(b)(C)(8).

Respectfully submitted,

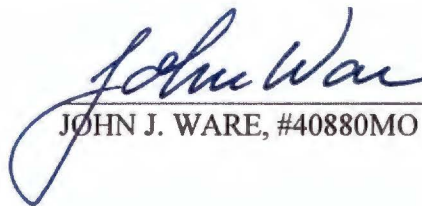
SAYLER A. FLEMING  
United States Attorney

  
JOHN J. WARE, #40880MO  
Assistant United States Attorney



UNITED STATES OF AMERICA )  
EASTERN DIVISION )  
EASTERN DISTRICT OF MISSOURI )

I, John J. Ware, Assistant United States Attorney for the Eastern District of Missouri, being  
duly sworn, do say that the foregoing information is true as I verily believe.

  
\_\_\_\_\_  
JOHN J. WARE, #40880MO

Subscribed and sworn to before me this 28th day of July, 2023.



\_\_\_\_\_  
Gregory J. Linhares  
CLERK, U.S. DISTRICT COURT

By: \_\_\_\_\_ /s/ JKL  
DEPUTY CLERK

