

JOHN W. HUBER, United States Attorney (#7226)
AARON W. FLATER, Assistant United States Attorney (#9458)
THADDEUS J. MAY, Assistant United States Attorney (#11317)
Attorneys for the United States of America
111 South Main Street, Suite 1800
Salt Lake City, Utah 84111
Telephone: (801) 325-3251
Cell: (801) 389-0108
Tad.may@usdoj.gov

FILED IN UNITED STATES DISTRICT
COURT, DISTRICT OF UTAH

MAY 16 2019

D. MARK JONES, CLERK
BY _____
DEPUTY CLERK

SEALED

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

OLUWOLE ADEGBORUWA

Defendant.

Case No. *2:19-mj-349-EJF*

FILED UNDER SEAL

COMPLAINT

Count 1: 21 U.S.C. §§ 841(a)(1)
Distribution of a Controlled Substance

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

Count 3: 21 U.S.C. §§ 841(a)(1)
Distribution of a Controlled Substance

Magistrate Judge Evelyn J. Furse

Before the Honorable Evelyn J. Furse, United States Magistrate Judge for the District of Utah, appears the undersigned, who on oath deposes and says:

COUNT 1

21 U.S.C. §§ 841(a)(1)
(Distribution of Oxycodone)

On May 7, 2018, in the Central Division of the District of Utah,

OLUWOLE ADEGBORUWA, the named defendant herein, did knowingly and intentionally distribute a controlled substances, to wit: Oxycodone, a Schedule II controlled substance, within the meaning of 21 U.S.C. § 812; in violation of 21 U.S.C. §841(a)(1), and punishable pursuant to 21 U.S.C. §841(b)(1)(C).

COUNT 2

21 U.S.C. §§ 841(a)(1)
(Distribution of Hydrocodone)

On March 6, 2019, in the Central Division of the District of Utah, OLUWOLE ADEGBORUWA, the named defendant herein, did knowingly and intentionally distribute a controlled substances, to wit: 50 tablets of Hydrocodone, a Schedule II controlled substance, within the meaning of 21 U.S.C. § 812; in violation of 21 U.S.C. §841(a)(1), and punishable pursuant to 21 U.S.C. §841(b)(1)(C).

COUNT 3

21 U.S.C. §§ 841(a)(1)
(Distribution of Oxycodone)

On April 18, 2019, in the Central Division of the District of Utah, OLUWOLE ADEGBORUWA, the named defendant herein, did knowingly and intentionally distribute a controlled substances, to wit: 30 tablets of Oxycodone, a Schedule II controlled substance, within the meaning of 21 U.S.C. § 812; in violation of 21 U.S.C. §841(a)(1), and punishable pursuant to 21 U.S.C. §841(b)(1)(C).

Agent Background

1. Your Complainant/Affiant, Ely Hebert, is a Special Agent with the Drug Enforcement Administration (DEA), currently assigned to the Salt Lake City District Office. I have been employed by the Drug Enforcement Administration (DEA) as a Special Agent since May 2003.

Through the DEA, I have received specialized training in the enforcement of federal narcotics laws. My training and experience has involved, among other things: (1) the debriefing of defendants, witnesses and informants, as well as others who have knowledge of the distribution and transportation of controlled substances and the laundering and concealment of proceeds of drug trafficking; (2) surveillance; (3) analysis of documentary and physical evidence; (4) the hand-to-hand purchase of controlled substances; and (5) the execution of search warrants.

2. Based on my training and experience as a DEA agent, I am familiar with the manner in which narcotics traffickers conduct their drug-related businesses, including: the methods employed by dealers to import and distribute narcotics, their use of telephones in furtherance of their illegal activities and their use of coded language to refer to narcotics, drug proceeds, counter-surveillance, and other aspects of narcotics trafficking. I am also familiar with their use of computers and the "Darkweb" to sell and distribute controlled substances. I have gained knowledge and experience specifically related to "Darkweb" market places, vendors and their distribution activities including the use of crypto-currency such as Bitcoin.

3. The statements in this Complaint are based in part on information provided by law enforcement officers assigned to other law enforcement agencies, other Special Agents and employees of the DEA and on my experience and background as a Special Agent of the DEA, and information received from confidential informants. Since this Complaint is being submitted for the limited purpose of securing a Complaint from the Court, your Affiant has not included each and every fact known to Complainant concerning this investigation.

Probable Cause

This complaint is made on the basis of an investigation consisting of the following:

Initial Investigation

4. On March 5, 2018, a Source of Information (hereinafter referred to as "SOI #1")¹ came to the DEA SLCDO to be interviewed regarding the online purchasing of illicit Narcotics from the Darkweb. DEA SLCDO Task Force Officer (TFO) J. Nattress, Special Agent (SA) E. Hebert, and Intelligence Research Specialist (IRS) C. Salyards conducted the interview. Investigators previously received records from Dutch National Police via Europol and DEA Headquarters of Oxycodone purchases by the SOI from an individual who goes by the name "Kingodua" on the Darkweb marketplace called "HANSA." The records showed six (6) separate Darkweb purchases by the SOI from "Kingodua" from June 30, 2017 through July 17, 2017. The SOI was candid about the SOI's transactions on the Darkweb with "Kingodua" to investigators. The SOI stated that in approximately August of 2016, the SOI had a shoulder surgery that did not go well, followed by another surgery approximately a week later. The SOI stated the first surgery was botched and her doctor gave the SOI prescriptions for Lortab, Morphine, Oxycodone, and Oxycontin all at the same time. The SOI stated the SOI then became addicted to the pain pills and eventually had to go into rehabilitation. The SOI stated the SOI was clean up until June 2017. The SOI stated the SOI then performed a Google search on how to order pain pills on the internet. The SOI stated the search lead to a "Reddit" article which taught step by step how to purchase drugs from the Darkweb using

¹ SOI #1 is a cooperating witness who previously purchased controlled substances from "Kingodua" over the "darkweb". SOI #1 has not been charged in this investigation and was not monetarily compensated by the government for providing information.

bitcoin. The SOI stated the SOI downloaded a TOR browser² and shopped vendors on the “HANSA” Darkweb market. The SOI stated the SOI first ordered two batches of 2-4 Oxycodone 30 MG pills from a vendor named “Mike Mcdermitt,” but the pills seemed fake and ineffective and took a long time to ship.

5. The SOI stated he/she then saw a vendor named “Kingodua” who advertised next day shipping to the SOI’s area of Utah. The SOI admitted purchasing Oxycodone 30 MG tablets from “Kingodua” a total of six (6) times, each time in varied quantities. The SOI stated the packages would in fact arrive the next day if ordered early enough in the day. The SOI stated the first four (4) orders he/she received contained pills that seemed weaker than the Oxycodone pills the SOI was used to. The SOI stated the fifth and sixth batch of pills seemed very potent and the SOI lost consciousness after taking two pills from the sixth order. The SOI stated he/she took the pills from the sixth batch while at a friend’s house and when the SOI lost consciousness, the SOI’s friend (who happened to be a nurse) had to use vigorous sternum rubs to revive her. The SOI stated the friend told the SOI she was completely unresponsive and that the SOI’s face turned blue for several minutes. The SOI stated the vendor “Kingodua” advertised that his/her pills are “non-fent,” meaning they did not contain fentanyl. The SOI believed that to be untrue and believed that the pills were fake and probably did contain fentanyl. The SOI said that in hindsight the pills appeared to be flawed from normal factory pills in that they had some imperfect edges in the inscriptions and the blue coloring seemed splotchy and inconsistent. The SOI stated all the pills had the imprints “M/30” on them.

² TOR, short for The Onion Router, is computer software which relies on a network of volunteer computers to route users’ web traffic through a series of other users’ computers such that the traffic cannot be traced to the original user. This provides anonymity allowing individuals to buy and sell illegal goods and communicate anonymously to avoid detection by law enforcement.

Identification of Target

9. Based on the fact that packages were being sent from Las Vegas, Nevada, investigators examined customer reviews for Kingodua/Alagbada726 and found a customer who had ordered drugs from Kingodua/Alagbada 726 and had listed an unencrypted address as 18 Woodwell Circle, Amesbury, MA 01913. An administrative subpoena was then issued by the DEA to Federal Express (FEDEX) on March 15, 2018, which was returned on March 22, 2018. In the subpoena return for deliveries to 18 Woodwell Circle, Amesbury, MA 01913, were a list of packages sent from Las Vegas, Nevada. There were 21 shipments to a Matthew TAYLOR at 18 Woodwell Circle, Amesbury, MA 01913, from 840 S. Rancho Dr., STE 4-626, Las Vegas, NV 89106, under FEDEX shipper customer number 882949982.

10. On March 27, 2018, an administrative subpoena was issued to FEDEX for all information pertaining to customer number 882949982, including payment information and shipment records relating to deliveries in 2017 and 2018. On April 3rd, 2018, FEDEX responded to the subpoena with the following information:

Name: ADEGBORUWA, Oluwole
Company: Legers Medical Supply and Orth LLC
Address: 7319 Crow Canyon Ave, Las Vegas, NV 89179
Phone Numbers: 702-929-0108 and 702-629-8960
Credit Card Number: 4635890004387956 - Exp date: 12/2021
Email: legersmedical@gmail.com
First Ship Date: 04/17/2017
Last Ship Date: 03/30/2018
Last Pay Date: 03/28/2018
Packages sent in the last 12 months: 726

11. Based on shipping records provided by FEDEX for shipping customer number 882949982, an administrative subpoena was issued to FEDEX on April 4, 2018, for video of the identified customer sending packages. Video surveillance returned to DEA by FEDEX shows

ADEGBORUWA approaching the counter and sending packages on various dates. Investigators, including your affiant, have seen ADEGBORUWA in person during surveillance as well as in photographs of his drivers license and on his social media accounts. The individual in the video obtained from FEDEX clearly matches the description of ADEGBORUWA. The credit card listed under the above listed customer number also came back to ADEGBORUWA. A law enforcement database check found ADEGBORUWA to be living at 7319 Crow Canyon Ave., Las Vegas, NV. Additionally, a search of that same credit card in the USPS databases found it was used to conduct two (2) separate transactions in March 2018.

12. One transaction using that credit card was for an Express Mail parcel to Canada. From that label, Postal Inspector M. Moore was able to conclude ADEGBORUWA was listed as the sender of the parcel and the associated address was 7319 Crow Canyon Ave., Las Vegas, NV, 89179. The phone number listed on the label (702) 929-0108) also returned to ADEGBORUWA. Surveillance provided from the James Brown Post Office in Las Vegas, Nevada shows ADEGBORUWA on March 14, 2018, the same date the package was sent. Research of information originally provided by the Dutch National Police through USPS databases showed the vendor "Kingodua" utilized the James Brown Post Office to send parcels.

13. During the second transaction, on March 30, 2018, an individual using the same credit card entered a Las Vegas post office and mailed seventeen (17) parcels. Sixteen (16) of those parcels contained EasyPost postage; the last, however, was a return mailing to a legitimate women's clothing company. Investigation of the information provided on the sixteen (16) mailings led to the identification of approximately 450 mailings believed to be associated with Kingodua beginning March 26, 2018, through May 2, 2018.

14. Additionally, the return address ADEGBORUWA utilized between March 26, 2018, and March 31, 2018 associated with 125 mailings is "Digi-Prints Nevada LLC, 7300 W Sahara Ave, Las Vegas, NV 89117-2756." A search of the 7300 W. Sahara Ave. address in the USPS Inspection Service database showed that in September 2017, a parcel containing Oxycodone was intercepted en route to 222 2nd St. SE, Number302, Minneapolis, MN 55414, from that return address.

Undercover Purchase #1 by DEA

15. Investigators also learned on the "Darkweb" market place "Dream Market" that "Kingodua" was now utilizing the moniker "Alagbada726" to sell Oxycodone and other controlled pharmaceuticals. It was learned based on his Dream Market activities that Kingodua/Alagbada726 sold at least Oxycodone and Xanax over the Darkweb and payments from customers were made utilizing the crypto-currency Bitcoin (BTC). Based on this information, Your affiant established an undercover (UC) online identity in order to attempt drug purchases with Kingodua/Alagbada726 through Dream Market. Your affiant was then authorized to conduct such a purchase. Based on these approvals, your affiant obtained \$500.00 of official funds and deposited the \$500.00 into a pre-authorized bank account as witnessed by Task Force Officer (TFO) J. Fife.

16. On May 3, 2018, your affiant, witnessed by DI C. Bolman, logged onto Dream Market and obtained the Dream Market BTC address. Your affiant then copied the BTC address from the Dream Market account and pasted it in the recipient box on the Bitcoin account. When your affiant pushed the "Send Max" button, the Bitcoin account total was 0.04893 BTC valued at \$471.91. In order to complete this transaction, a BTC "Miner fee" was also added, which equaled BTC 0.00002 valued at \$0.26, leaving a total for the transaction at BTC 0.048961, or \$472.17. Your

affiant then confirmed the transaction. Your affiant then went back to the Dream Market account which showed the balance in the Dream Market account to now be BTC 0.04893454. Your affiant then went to the vendor site for ADEGBORUWA, who was using the "Alagbada726" account, and placed an order for 10 Oxycodone 30mg pills at a cost of BTC 0.00376, or \$36.40 per tablet. A list of shipping options was provided by ADEGBORUWA and your affiant utilized "USPS Priority Mail 2-3 days" at a cost of BTC 0.001239, or \$12.00. Your affiant then added this to the "cart" on the UC Dream Market account and the total cost for the 10 Oxycodone 30mg pills including the shipping came out to BTC 0.0388, which was approximately \$376.00. Your affiant then input a shipping address and checked the box "Encrypt message" as well as the box "I understand this order is not using escrow and the vendor is being paid when he sends the package." Your affiant then clicked the "Order now" button and received a message stating "Product order confirmed" followed by the note "Alagbada726 has received your order."

17. On May 4, 2018, your affiant logged onto the Dream Market account and observed two (2) messages in the messaging system of the account. The two messages stated the following "The seller has accepted your order" and "The seller has sent your order."

18. On May 7, 2018, your affiant contacted USPI (U.S. Postal Inspector) M. Moore, who conducted database checks with the USPIS (U.S. Postal Inspection Service) and learned a package had arrived in the Central District of Utah, at the post office where a Post Office Box has been established for this investigation. Based on this information, your affiant and USPI Moore met at the identified United States Post Office to retrieve the package. At approximately 11:30 am, USPI Moore and your affiant retrieved a package from the undercover Post Office box which contained the ordered purported Oxycodone. The Oxycodone was contained inside a priority mail envelope

bearing tracking number 9405536897846368675773 with a return address of "HEARING ASSOCIATES OF LV 2580 ANTHEM VILLIAGE DR STE B-05 MOORE NV 89052-5503."

Your affiant and USPI Moore transported the package to the Salt Lake City DEA Office where it was processed and found to contain pills consistent with those of Oxycodone, packaged inside heat sealed plastic and taped inside a CD/DVD case. This packaging is consistent with other packages sent by "Alagbada726."

Intercepted Purchase

19. On March 6, 2019 SA Hebert and United States Postal Inspector (USPI) Moore conducted an interview of a Source of Information (SOI #2)³, who was identified as a customer of ADEGBORUWA in Salt Lake City, Utah. The interview was based on a package that was seized by the United States Postal Inspection Service (USPIS) after it was determined the package came from ADEGBORUWA, who operates out of Las Vegas, Nevada and Los Angeles, CA. The package had been sent to the District of Utah to the address of the SOI#2. The individual told investigators there would be 50 pills of "Norco" in the package, otherwise known as Hydrocodone. The investigators obtained consent to open the package which did contain 50 pills of suspected Hydrocodone, a schedule II controlled substance. This customer informed investigators he had been ordering the pills from "Alagbada726" for approximately 10 months and the pills started off at \$8 per pill and had gone up to \$15 per pill.

Undercover Purchase #2 by USPIS

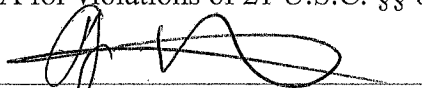
³ SOI #2 is a cooperating witness who previously purchased controlled substances from "darkweb" vendor "Alagbada726". SOI #2 has not been charged in this investigation and was not monetarily compensated by the government for providing information.

20. April 12, 2019, Postal Inspector J. Wissler, acting in an undercover capacity, accessed Wall Street Market, an online darknet marketplace, to conduct an undercover purchase of Oxycodone from the moniker KingOdua. Postal Inspector Wissler utilized the cryptocurrency BTC to purchase the controlled substance. The approximate exchange rate of one BTC on April 12, 2019, was \$5,792.95 U.S. Currency ("USC"). Vendor "KingOdua" offers various pharmaceuticals. Through the course of the investigation "KingOdua" has been identified as using the Hansa Market, Dream Market, and most recently, Wall Street Market. While acting in an undercover capacity, Inspector Wissler purchased a quantity of 30 Oxycodone pills from "KingOdua". The purchase was for 30 pills listed as "1x\$36. Oxy 30mg.A215/K9/M30/V48/ALG265/A51/RP30.Pharm Oxycodone" at a price of \$36.00 per piece. The shipping option selected by Inspector Wissler was "USPS Priority Mail 2-3 days (\$12.00)". It was notated next to the shipping option that the price of shipping would be included in the overall price. A purchase of 30 Oxycodone pills, to include Priority Mail shipping, totaled 0.21564875 BTC, \$1,092.00 USC. The shipping address provided to "KingOdua" was an undercover address controlled by members of the U.S. Postal Inspection Service, *IN THE CENTRAL DISTRICT OF UTAH.*

21. On April 17, 2019, Postal Inspector Wissler notified Postal Inspector Moore the SUBJECT PARCEL had arrived at the undercover address. On April 18, 2019, Postal Inspector Moore took custody of the parcel. That same day, with the assistance of Postal Inspector Jared Dimick, the parcel was opened and the contents were revealed. The SUBJECT PARCEL is described as follows: One USPS Priority Mail envelope bearing USPS tracking number 9405 5368 97846787 9097 18, with a return address of "GTA VIDEO GAMES INC. 529 S LOS

ANGELES ST B LOS ANGELES CA 90013-2728.” It is a white Priority Mail envelope measuring approximately 12.5” x 9.5”, mailed on April 13, 2019, with an origin acceptance scan from Gardena, CA 90247, and en route scan through Los Angeles, weighing approximately 0 lbs 3 oz, with affixed EasyPost postage in the amount of \$5.25. The SUBJECT PARCEL contents are described as follows: one manila padded envelope with the writing “JW 30” in the top left hand corner and “JW 30 P” at the center envelope, one plain white First-Class Mail envelope, and 30 round, light blue in color pills, containing the marking "e8", appearance consistent with oxycodone 30mg pills. The pills were secured within a small vacuum sealed clear wrapping with the writing “30 JW-P”.

Based on the foregoing information, your Affiant respectfully requests that a warrant of arrest be issued for Oluwole ADEGBORUWA for violations of 21 U.S.C. §§ 841(a)(1).


Ely Hébert
Special Agent,
Drug Enforcement Administration

APPROVED:

JOHN W. HUBER
United States Attorney


AARON W. FLATER
THADDEUS J. MAY
Assistant United States Attorneys

SUBSCRIBED AND SWORN TO BEFORE ME this 16th day of May, 2019.


Evelyn Furse
United States Magistrate Judge

JOHN W. HUBER, United States Attorney (#7226)
AARON W. FLATER, Assistant United States Attorney (#9458)
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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,	Case No. <i>2:19-mj-349-EJF</i>
Plaintiff,	<u>FILED UNDER SEAL</u>
vs.	COMPLAINT
OLUWOLE ADEGBORUWA	Count 1: 21 U.S.C. §§ 841(a)(1) Distribution of a Controlled Substance
Defendant.	Count 2: 21 U.S.C. §§ 841(a)(1) Distribution of a Controlled Substance
	Count 3: 21 U.S.C. §§ 841(a)(1) Distribution of a Controlled Substance
	Magistrate Judge Evelyn J. Furse

Before the Honorable Evelyn J. Furse, United States Magistrate Judge for the District of Utah, appears the undersigned, who on oath deposes and says:

COUNT 1
21 U.S.C. §§ 841(a)(1)
(Distribution of Oxycodone)

On May 7, 2018, in the Central Division of the District of Utah,

OLUWOLE ADEGBORUWA, the named defendant herein, did knowingly and intentionally distribute a controlled substances, to wit: Oxycodone, a Schedule II controlled substance, within the meaning of 21 U.S.C. § 812; in violation of 21 U.S.C. §841(a)(1), and punishable pursuant to 21 U.S.C. §841(b)(1)(C).

COUNT 2

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COUNT 3

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On April 18, 2019, in the Central Division of the District of Utah, OLUWOLE ADEGBORUWA, the named defendant herein, did knowingly and intentionally distribute a controlled substances, to wit: 30 tablets of Oxycodone, a Schedule II controlled substance, within the meaning of 21 U.S.C. § 812; in violation of 21 U.S.C. §841(a)(1), and punishable pursuant to 21 U.S.C. §841(b)(1)(C).

Agent Background

1. Your Complainant/Affiant, Ely Hebert, is a Special Agent with the Drug Enforcement Administration (DEA), currently assigned to the Salt Lake City District Office. I have been employed by the Drug Enforcement Administration (DEA) as a Special Agent since May 2003.

Through the DEA, I have received specialized training in the enforcement of federal narcotics laws. My training and experience has involved, among other things: (1) the debriefing of defendants, witnesses and informants, as well as others who have knowledge of the distribution and transportation of controlled substances and the laundering and concealment of proceeds of drug trafficking; (2) surveillance; (3) analysis of documentary and physical evidence; (4) the hand-to-hand purchase of controlled substances; and (5) the execution of search warrants.

2. Based on my training and experience as a DEA agent, I am familiar with the manner in which narcotics traffickers conduct their drug-related businesses, including: the methods employed by dealers to import and distribute narcotics, their use of telephones in furtherance of their illegal activities and their use of coded language to refer to narcotics, drug proceeds, counter-surveillance, and other aspects of narcotics trafficking. I am also familiar with their use of computers and the “Darkweb” to sell and distribute controlled substances. I have gained knowledge and experience specifically related to “Darkweb” market places, vendors and their distribution activities including the use of crypto-currency such as Bitcoin.

3. The statements in this Complaint are based in part on information provided by law enforcement officers assigned to other law enforcement agencies, other Special Agents and employees of the DEA and on my experience and background as a Special Agent of the DEA, and information received from confidential informants. Since this Complaint is being submitted for the limited purpose of securing a Complaint from the Court, your Affiant has not included each and every fact known to Complainant concerning this investigation.

Probable Cause

This complaint is made on the basis of an investigation consisting of the following:

Initial Investigation

4. On March 5, 2018, a Source of Information (hereinafter referred to as "SOI #1")¹ came to the DEA SLCDO to be interviewed regarding the online purchasing of illicit Narcotics from the Darkweb. DEA SLCDO Task Force Officer (TFO) J. Nattress, Special Agent (SA) E. Hebert, and Intelligence Research Specialist (IRS) C. Salyards conducted the interview. Investigators previously received records from Dutch National Police via Europol and DEA Headquarters of Oxycodone purchases by the SOI from an individual who goes by the name "Kingodua" on the Darkweb marketplace called "HANSA." The records showed six (6) separate Darkweb purchases by the SOI from "Kingodua" from June 30, 2017 through July 17, 2017. The SOI was candid about the SOI's transactions on the Darkweb with "Kingodua" to investigators. The SOI stated that in approximately August of 2016, the SOI had a shoulder surgery that did not go well, followed by another surgery approximately a week later. The SOI stated the first surgery was botched and her doctor gave the SOI prescriptions for Lortab, Morphine, Oxycodone, and Oxycontin all at the same time. The SOI stated the SOI then became addicted to the pain pills and eventually had to go into rehabilitation. The SOI stated the SOI was clean up until June 2017. The SOI stated the SOI then performed a Google search on how to order pain pills on the internet. The SOI stated the search lead to a "Reddit" article which taught step by step how to purchase drugs from the Darkweb using

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bitcoin. The SOI stated the SOI downloaded a TOR browser² and shopped vendors on the “HANSA” Darkweb market. The SOI stated the SOI first ordered two batches of 2-4 Oxycodone 30 MG pills from a vendor named “Mike Mcdermitt,” but the pills seemed fake and ineffective and took a long time to ship.

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6. After the sixth order, the SOI stopped purchasing these pills online and again sought treatment for her addiction. The SOI stated the pills were shipped in a USPS shipping envelope and were always wrapped in what the SOI described as blue tinted plastic. In your Affiant's training and experience, this blue tinted plastic is likely Mylar, which is often utilized by drug dealers to disguise and protect the contents of the packages due to its unique barrier properties and strength. The SOI stated the pills would arrive sometimes between two baseball cards to disguise their shape and another time the pills were shipped inside a CD-ROM case. The SOI stated "Kingodua" also used bubble wrap to protect the product during shipping. The SOI stated the two orders of pills purchased from the vendor "Mike McDermitt" were packaged similarly to the pills purchased from "Kingodua," in that they both shipped pills between two baseball cards to conceal the shape of the pills in the packaging.

7. The SOI stated he/she did not keep any of the packaging materials, but recalled that the return address on the packages showed as coming from Las Vegas, Nevada. The SOI stated could not remember an exact address, but remembered seeing the name "Rancho" (possibly Rancho Dr. or Rio Rancho Dr.) on the shipping return address used.

8. The SOI paid \$29.00 per pill he/she ordered from "Kingodua" and racked up \$5,000-\$6,000 in debt purchasing pills online during a short, approximately one month long period. The SOI stated when he/she would place with orders with "Kingodua," the person that responded to the orders used proper grammar and did not use any words out of the ordinary. The SOI stated there was nothing that stood out to in "Kingodua's" messages that would give any further insight on whom or from where this individual was.

Identification of Target

9. Based on the fact that packages were being sent from Las Vegas, Nevada, investigators examined customer reviews for Kingodua/Alagbada726 and found a customer who had ordered drugs from Kingodua/Alagbada 726 and had listed an unencrypted address as 18 Woodwell Circle, Amesbury, MA 01913. An administrative subpoena was then issued by the DEA to Federal Express (FEDEX) on March 15, 2018, which was returned on March 22, 2018. In the subpoena return for deliveries to 18 Woodwell Circle, Amesbury, MA 01913, were a list of packages sent from Las Vegas, Nevada. There were 21 shipments to a Matthew TAYLOR at 18 Woodwell Circle, Amesbury, MA 01913, from 840 S. Rancho Dr., STE 4-626, Las Vegas, NV 89106, under FEDEX shipper customer number 882949982.

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Name: ADEGBORUWA, Oluwole
Company: Legers Medical Supply and Orth LLC
Address: 7319 Crow Canyon Ave, Las Vegas, NV 89179
Phone Numbers: 702-929-0108 and 702-629-8960
Credit Card Number: 4635890004387956 - Exp date: 12/2021
Email: legersmedical@gmail.com
First Ship Date: 04/17/2017
Last Ship Date: 03/30/2018
Last Pay Date: 03/28/2018
Packages sent in the last 12 months: 726

11. Based on shipping records provided by FEDEX for shipping customer number 882949982, an administrative subpoena was issued to FEDEX on April 4, 2018, for video of the identified customer sending packages. Video surveillance returned to DEA by FEDEX shows

ADEGBORUWA approaching the counter and sending packages on various dates. Investigators, including your affiant, have seen ADEGBORUWA in person during surveillance as well as in photographs of his drivers license and on his social media accounts. The individual in the video obtained from FEDEX clearly matches the description of ADEGBORUWA. The credit card listed under the above listed customer number also came back to ADEGBORUWA. A law enforcement database check found ADEGBORUWA to be living at 7319 Crow Canyon Ave., Las Vegas, NV. Additionally, a search of that same credit card in the USPS databases found it was used to conduct two (2) separate transactions in March 2018.

12. One transaction using that credit card was for an Express Mail parcel to Canada. From that label, Postal Inspector M. Moore was able to conclude ADEGBORUWA was listed as the sender of the parcel and the associated address was 7319 Crow Canyon Ave., Las Vegas, NV, 89179. The phone number listed on the label (702) 929-0108 also returned to ADEGBORUWA. Surveillance provided from the James Brown Post Office in Las Vegas, Nevada shows ADEGBORUWA on March 14, 2018, the same date the package was sent. Research of information originally provided by the Dutch National Police through USPS databases showed the vendor "Kingodua" utilized the James Brown Post Office to send parcels.

13. During the second transaction, on March 30, 2018, an individual using the same credit card entered a Las Vegas post office and mailed seventeen (17) parcels. Sixteen (16) of those parcels contained EasyPost postage; the last, however, was a return mailing to a legitimate women's clothing company. Investigation of the information provided on the sixteen (16) mailings led to the identification of approximately 450 mailings believed to be associated with Kingodua beginning March 26, 2018, through May 2, 2018.

14. Additionally, the return address ADEGBORUWA utilized between March 26, 2018, and March 31, 2018 associated with 125 mailings is “Digi-Prints Nevada LLC, 7300 W Sahara Ave, Las Vegas, NV 89117-2756.” A search of the 7300 W. Sahara Ave. address in the USPS Inspection Service database showed that in September 2017, a parcel containing Oxycodone was intercepted en route to 222 2nd St. SE, Number302, Minneapolis, MN 55414, from that return address.

Undercover Purchase #1 by DEA

15. Investigators also learned on the “Darkweb” market place “Dream Market” that “Kingodua” was now utilizing the moniker “Alagbada726” to sell Oxycodone and other controlled pharmaceuticals. It was learned based on his Dream Market activities that Kingodua/Alagbada726 sold at least Oxycodone and Xanax over the Darkweb and payments from customers were made utilizing the crypto-currency Bitcoin (BTC). Based on this information, Your affiant established an undercover (UC) online identity in order to attempt drug purchases with Kingodua/Alagbada726 through Dream Market. Your affiant was then authorized to conduct such a purchase. Based on these approvals, your affiant obtained \$500.00 of official funds and deposited the \$500.00 into a pre-authorized bank account as witnessed by Task Force Officer (TFO) J. Fife.

16. On May 3, 2018, your affiant, witnessed by DI C. Bolman, logged onto Dream Market and obtained the Dream Market BTC address. Your affiant then copied the BTC address from the Dream Market account and pasted it in the recipient box on the Bitcoin account. When your affiant pushed the “Send Max” button, the Bitcoin account total was 0.04893 BTC valued at \$471.91. In order to complete this transaction, a BTC “Miner fee” was also added, which equaled BTC 0.00002 valued at \$0.26, leaving a total for the transaction at BTC 0.048961, or \$472.17. Your

affiant then confirmed the transaction. Your affiant then went back to the Dream Market account which showed the balance in the Dream Market account to now be BTC 0.04893454. Your affiant then went to the vendor site for ADEGBORUWA, who was using the "Alagbada726" account, and placed an order for 10 Oxycodone 30mg pills at a cost of BTC 0.00376, or \$36.40 per tablet. A list of shipping options was provided by ADEGBORUWA and your affiant utilized "USPS Priority Mail 2-3 days" at a cost of BTC 0.001239, or \$12.00. Your affiant then added this to the "cart" on the UC Dream Market account and the total cost for the 10 Oxycodone 30mg pills including the shipping came out to BTC 0.0388, which was approximately \$376.00. Your affiant then input a shipping address and checked the box "Encrypt message" as well as the box "I understand this order is not using escrow and the vendor is being paid when he sends the package." Your affiant then clicked the "Order now" button and received a message stating "Product order confirmed" followed by the note "Alagbada726 has received your order."

17. On May 4, 2018, your affiant logged onto the Dream Market account and observed two (2) messages in the messaging system of the account. The two messages stated the following "The seller has accepted your order" and "The seller has sent your order."

18. On May 7, 2018, your affiant contacted USPI (U.S. Postal Inspector) M. Moore, who conducted database checks with the USPIS (U.S. Postal Inspection Service) and learned a package had arrived in the Central District of Utah, at the post office where a Post Office Box has been established for this investigation. Based on this information, your affiant and USPI Moore met at the identified United States Post Office to retrieve the package. At approximately 11:30 am, USPI Moore and your affiant retrieved a package from the undercover Post Office box which contained the ordered purported Oxycodone. The Oxycodone was contained inside a priority mail envelope

bearing tracking number 9405536897846368675773 with a return address of "HEARING ASSOCIATES OF LV 2580 ANTHEM VILLIAGE DR STE B-05 MOORE NV 89052-5503."

Your affiant and USPI Moore transported the package to the Salt Lake City DEA Office where it was processed and found to contain pills consistent with those of Oxycodone, packaged inside heat sealed plastic and taped inside a CD/DVD case. This packaging is consistent with other packages sent by "Alagbada726."

Intercepted Purchase

19. On March 6, 2019 SA Hebert and United States Postal Inspector (USPI) Moore conducted an interview of a Source of Information (SOI #2)³, who was identified as a customer of ADEGBORUWA in Salt Lake City, Utah. The interview was based on a package that was seized by the United States Postal Inspection Service (USPIS) after it was determined the package came from ADEGBORUWA, who operates out of Las Vegas, Nevada and Los Angeles, CA. The package had been sent to the District of Utah to the address of the SOI#2. The individual told investigators there would be 50 pills of "Norco" in the package, otherwise known as Hydrocodone. The investigators obtained consent to open the package which did contain 50 pills of suspected Hydrocodone, a schedule II controlled substance. This customer informed investigators he had been ordering the pills from "Alagbada726" for approximately 10 months and the pills started off at \$8 per pill and had gone up to \$15 per pill.

Undercover Purchase #2 by USPIS

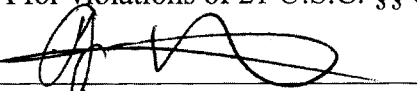
³ SOI #2 is a cooperating witness who previously purchased controlled substances from "darkweb" vendor "Alagbada726". SOI #2 has not been charged in this investigation and was not monetarily compensated by the government for providing information.

20. April 12, 2019, Postal Inspector J. Wissler, acting in an undercover capacity, accessed Wall Street Market, an online darknet marketplace, to conduct an undercover purchase of Oxycodone from the moniker KingOdua. Postal Inspector Wissler utilized the cryptocurrency BTC to purchase the controlled substance. The approximate exchange rate of one BTC on April 12, 2019, was \$5,792.95 U.S. Currency ("USC"). Vendor "KingOdua" offers various pharmaceuticals. Through the course of the investigation "KingOdua" has been identified as using the Hansa Market, Dream Market, and most recently, Wall Street Market. While acting in an undercover capacity, Inspector Wissler purchased a quantity of 30 Oxycodone pills from "KingOdua". The purchase was for 30 pills listed as "1x\$36. Oxy 30mg.A215/K9/M30/V48/ALG265/A51/RP30.Pharm Oxycodone" at a price of \$36.00 per piece. The shipping option selected by Inspector Wissler was "USPS Priority Mail 2-3 days (\$12.00)". It was notated next to the shipping option that the price of shipping would be included in the overall price. A purchase of 30 Oxycodone pills, to include Priority Mail shipping, totaled 0.21564875 BTC, \$1,092.00 USC. The shipping address provided to "KingOdua" was an undercover address controlled by members of the U.S. Postal Inspection Service, IN THE CENTRAL DISTRICT OF UTAH.

21. On April 17, 2019, Postal Inspector Wissler notified Postal Inspector Moore the SUBJECT PARCEL had arrived at the undercover address. On April 18, 2019, Postal Inspector Moore took custody of the parcel. That same day, with the assistance of Postal Inspector Jared Dimick, the parcel was opened and the contents were revealed. The SUBJECT PARCEL is described as follows: One USPS Priority Mail envelope bearing USPS tracking number 9405 5368 97846787 9097 18, with a return address of "GTA VIDEO GAMES INC. 529 S LOS

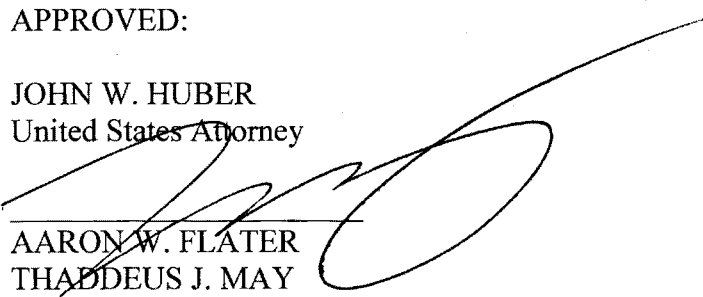
ANGELES ST B LOS ANGELES CA 90013-2728.” It is a white Priority Mail envelope measuring approximately 12.5” x 9.5”, mailed on April 13, 2019, with an origin acceptance scan from Gardena, CA 90247, and en route scan through Los Angeles, weighing approximately 0 lbs 3 oz, with affixed EasyPost postage in the amount of \$5.25. The SUBJECT PARCEL contents are described as follows: one manila padded envelope with the writing “JW 30” in the top left hand corner and “JW 30 P” at the center envelope, one plain white First-Class Mail envelope, and 30 round, light blue in color pills, containing the marking “e8”, appearance consistent with oxycodone 30mg pills. The pills were secured within a small vacuum sealed clear wrapping with the writing “30 JW-P”.

Based on the foregoing information, your Affiant respectfully requests that a warrant of arrest be issued for Oluwole ADEGBORUWA for violations of 21 U.S.C. §§ 841(a)(1).

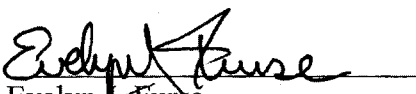

Ely Hebert
Special Agent,
Drug Enforcement Administration

APPROVED:

JOHN W. HUBER
United States Attorney


AARON W. FLATER
THADDEUS J. MAY
Assistant United States Attorneys

SUBSCRIBED AND SWORN TO BEFORE ME this 16th day of May, 2019.


Evelyn I. Furse
United States Magistrate Judge