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U.S. DISTRICT COURT
SOUTHERN DIST OHIO
CITY OF CINCINNATI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

CASE NO.

1:19CR136

Plaintiff,

INDICTMENT JUDGE BLACK

v.

KHLARI SIROTKIN (1)
a/k/a "Khlari Sirota," "Khlari Eleazor
Isbell SIROTKIN," "Klizo," "Sirota,"
"Kliz," "Killa B," "Slanggang," and
"@SlangGangRick,"

18 U.S.C. § 2
18 U.S.C. § 1956(h)
18 U.S.C. § 982(a)(1)
18 U.S.C. § 982(b)(1)
21 U.S.C. § 321 (g)(2)
21 U.S.C. § 331(i)(3)
21 U.S.C. § 333(b)(8)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)
21 U.S.C. § 841(b)(1)(B)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 846
21 U.S.C. § 853(a) and (p)

KELLY STEPHENS (2)
a/k/a "Kelly E Stephens," "Kelly
Shea," "Kelly Comatose," "Killa
Kells," "Kel," "Slanggang,"
"@SlangGangRick," and
"oxxxymoron,"

SEAN DEAVER (3)
a/k/a "Sean Deavers," "Sean Patrick
Deaver," "Fatz," "Fats," "Phatz,"
"Interstatefatz," "PillCosby," and
"Pill-Cosby,"

Notice of Forfeiture

ABBY JONES (4)
a/k/a "PillCosby," "Pill-Cosby," and
"Abby Phatz,"

SASHA SIROTKIN (5) a/k/a "Sasha
Sirota,"

Defendants.

THE GRAND JURY CHARGES THAT:

INTRODUCTORY ALLEGATIONS

At all times material to this Indictment, beginning in 2018 and continuing until the present there has been a joint investigation commenced by: the Federal Bureau of Investigation (FBI), the

Food and Drug Administration (FDA), the United States Postal Inspection Service (USPIS), the Drug Enforcement Administration (DEA), the Homeland Security Investigation (HSI), Ohio Bureau of Criminal Investigation (BCI), and the Cincinnati Police Department (CPD), regarding **KHLARI SIROTKIN** a/k/a “**Khleri Sirota**,” “**Khleri Eleazor Isbell SIROTKIN**,” “**Klizo**,” “**Sirota**,” “**Kliz**,” “**Killa B**,” “**Slanggang**,” and “**@SlangGangRick**,” **KELLY STEPHENS** a/k/a “**Kelly E Stephens**,” “**Kelly Shea**,” “**Kelly Comatose**,” “**Killa Kells**,” “**Kel**,” “**Slanggang**,” “**@SlangGangRick**,” and “**oxxymoron**,” **SEAN DEEVER** a/k/a “**Sean Deavers**,” “**Sean Patrick Deaver**,” “**Fatz**,” “**Fats**,” “**Phatz**,” “**Interstatefatz**,” “**PillCosby**,” and “**Pill-Cosby**,” **ABBY JONES** a/k/a “**PillCosby**,” “**Pill-Cosby**,” and “**Abby Phatz**,” **SASHA SIROTKIN** a/k/a “**Sasha Sirota**” and others (hereinafter, collectively, the “*PillCosby-Slanggang Drug Trafficking Organization*” or the “*PC-SG DTO*”).

At all times material to this Indictment, the following persons participated in the dark web narcotics trafficking and money laundering activities discussed herein:

- (1) **KHLARI SIROTKIN** a/k/a “**Khleri Sirota**,” “**Khleri Eleazor Isbell SIROTKIN**,” “**Klizo**,” “**Sirota**,” “**Kliz**,” “**Killa B**,” “**Slanggang**,” and “**@SlangGangRick**”, among other things:
 - a. serves as a key leader within the *PC-SG DTO*;
 - b. guides others (e.g., **KELLY STEPHENS**), on how to operate the *PC-SG DTO* vendor accounts;
 - c. is responsible for the handling of cryptocurrency obtained from *PC-SG DTO* online drug sales with **SEAN DEEVER**;
 - d. “mixes” [in order to obfuscate] “coins” (cryptocurrencies) prior to purchasing “labels” (shipping labels) for the *PC-SG DTO* and
 - e. acquires and liquidates cryptocurrencies for the *PC-SG DTO*.

(2) **KELLY STEPHENS** a/k/a “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “*Slanggang*,” “*@SlangGangRick*,” and “*oxxxymoron*”, among other things:

- a. performs key roles for the *PC-SG DTO*;
- b. assists **KHLARI SIROTKIN** in operation of the *Slanggang* vendor account and *Slanggangcentral* Wickr room, using technical knowledge to operate the online account and handling customer service issues as they may arise; and
- c. is a close associate to **KHLARI SIROTKIN** and is an equal partner in the operation of *Slanggangcentral*.

(3) **SEAN DEAVER** a/k/a “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “*PillCosby*,” and “*Pill-Cosby*”, among other things:

- a. is a key leader within the *PC-SG DTO*;
- b. is one of the main long-term drug sources of supply for the *PC-SG DTO*;
- c. with **ABBY JONES** actively operates the *Pill-Cosby* vendor account and supplies drugs to the entire *PC-SG DTO*; and
- d. manages the cryptocurrencies acquired from the *Pill-Cosby* vendor account and converts this asset into fiat currency.

(4) As to **ABBY JONES** a/k/a “*PillCosby*,” “*Pill-Cosby*,” and “**Abby Phatz**”, other things:

- a. assists **SEAN DEAVER** in the operation of *PC-SG DTO* vendor accounts;
- b. is the primary manager for acquiring shipping labels used by the *PC-SG DTO* to mail drug parcels through the United States Postal System (USPS); and
- c. actively communicates with **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEAVER, ABBY JONES, and SASHA SIROTKIN** regarding *PC-SG DTO* shipping labels, online management of the *PC-SG DTO* vendor accounts, and the packaging and shipping of *PC-SG DTO* drug products.

(5) As to **SASHA SIROTKIN** a/k/a “**Sasha Sirota**”, among other things:

- a. provides a facility for the packaging and distribution of drug products by the *PC-SG DTO* in North Hollywood, California; and

- b. provides funds for the purchase of postage used for the distribution of *PC-SG DTO* drug products.
- c. provides funds to **KHLARI SIROTKIN** for the purpose of sustaining the *PC-SG DTO*.

At all times relevant to this Indictment, the following are applicable terms and definitions:

a. The “dark web” is a portion of the Internet, where individuals must use an anonymizing 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.

b. “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.

c. The “Tor network,” or simply “Tor” (an abbreviation for “The Onion Router”), is a special network of computers on the Internet, distributed around the world, designed to conceal the true Internet Protocol (“IP”) addresses of the computers accessing the network, and, thereby, the locations and identities of the network’s users. Tor also enables websites to operate on the network in a way that conceals the true IP addresses of the computer servers hosting the websites, which are referred to as “hidden services” on the Tor network. Such hidden services operating on Tor have complex web addresses, generated by a computer algorithm, ending in “.onion” and can only be accessed through specific web browser software, including a browser known as “Tor Browser,” designed to access the Tor network. Tor is available on cellphones using the Android and Apple operating systems by installing an application that puts a Tor-enabled internet browser

on a user's cellphone, which then routes the phone's IP address through different servers all over the world, making it extremely difficult to track.

d. 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 (described below) 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.¹ Cryptocurrency is not illegal in the United States.

e. Bitcoin² ("BTC") is a type of cryptocurrency. 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. As mentioned above, 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.

¹ Some cryptocurrencies operate on blockchains that are not public and operate in such a way to obfuscate transactions, making it difficult to trace or attribute transactions.

² Since Bitcoin is both a cryptocurrency and a protocol, capitalization differs. Accepted practice is to use "Bitcoin" (singular with an uppercase letter B) to label the protocol, software, and community, and "bitcoin" (with a lowercase letter b) to label units of the cryptocurrency. That practice is adopted here.

Individuals can also acquire cryptocurrencies by “mining.” An individual can “mine” bitcoins by using his or her computing power to solve a complicated algorithm and verify and record payments on the blockchain. Individuals are rewarded for this task by receiving newly created units of a cryptocurrency. Individuals can send and receive cryptocurrencies online using many types of electronic devices, including laptop computers and smart phones. 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 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.

f. Although cryptocurrencies, such as bitcoin, have legitimate uses, cryptocurrency is also used by individuals and organizations for criminal purposes such as money laundering, and is an oft-used means of payment for illegal goods and services on hidden services websites operating on the Tor network. By maintaining multiple wallets, those who use cryptocurrency for illicit purposes can attempt to thwart law enforcement’s efforts to track purchases within the dark web marketplaces. As of October 31, 2019, one bitcoin is worth approximately \$9,160, though the value of bitcoin is generally much more volatile than that of fiat currencies.

g. Cryptocurrency can be stored in digital “wallets.” A wallet essentially stores the access code that allows an individual to conduct cryptocurrency transactions on the public ledger. To conduct transactions on the public ledger, an individual must use a public address (or “public key”) and a private address (or “private key”). The public address can be analogized to a traditional

bank account number, while the private key is like the password or PIN used to access that bank account.

h. Exchangers and users of cryptocurrencies store and transact their cryptocurrency in a number of ways, to include software, hardware, and paper (or physical form) forms. Software wallets can be housed in a variety of forms, including on a tangible, external device (“hardware wallet”), downloaded on a PC or laptop (“desktop wallet”), with an Internet-based cloud storage provider (“online wallet”), as a mobile application on a smartphone or tablet (“mobile wallet”), printed public and private keys (“paper wallet”), and as an online account associated with a cryptocurrency exchange. Because these desktop, mobile, and online wallets are electronic in nature, they are located on mobile devices (e.g., smart phones or tablets) or at websites that users can access via a computer, smart phone, or any device that can search the Internet. Hardware wallets are located on some type of external or removable media device, such as a USB thumb drive or other commercially available device designed to store cryptocurrency (e.g. Trezor, Keepkey, or Nano Ledger). In addition, paper wallets contain an address and a QR code³ with the public and private key embedded in the code. Paper wallet keys are not stored digitally. Wallets can also be backed up into, for example, paper printouts, USB drives, or CDs, and accessed through a “recovery seed” (random words strung together in a phrase) or a complex password. Additional security safeguards for cryptocurrency wallets can include two-factor authorization (such as a password and a phrase). The investigative team also knows that individuals possessing cryptocurrencies often have safeguards in place to ensure that their cryptocurrencies become further secured in the event that their assets become potentially vulnerable to seizure and/or unauthorized transfer.

³ A QR code is a matrix barcode that is a machine-readable optical label.

i. Bitcoin “exchangers” and “exchanges” are individuals or companies that exchange bitcoin for other currencies, including U.S. dollars. According to Department of Treasury, Financial Crimes Enforcement Network (“FinCEN”) Guidance issued on March 18, 2013, virtual currency administrators and exchangers, including an individual exchanger operating as a business, are considered money services businesses.⁴ Such exchanges and exchangers are required to register with FinCEN and have proper state licenses (if required under applicable state law). Registered money transmitters are required by law to follow Bank Secrecy Act anti-money laundering (“AML”) regulations, “Know Your Customer” (“KYC”) protocols, and other verification procedures similar to those employed by traditional financial institutions. For example, FinCEN-registered cryptocurrency exchangers often require customers who want to open or maintain accounts on their exchange to provide their name, address, phone number, and the full bank account and routing numbers that the customer links to an exchange account. As a result, there is significant market demand for illicit cryptocurrency-for-fiat currency exchangers, who lack AML or KYC protocols and often also advertise their ability to offer customers stealth and anonymity. These illicit exchangers routinely exchange fiat currency for cryptocurrencies by meeting customers in person or by shipping cash through the mail. Due to the illicit nature of these transactions and their customers’ desire for anonymity, such exchangers are frequently able to charge a higher exchange fee, often as high as 9–10% (in contrast to registered and BSA-compliant exchangers, who may charge fees as low as 1–2%).

j. Some companies offer cryptocurrency wallet services which allow users to download a digital wallet application onto their smart phone or other digital device. A user

⁴ See “Application of FinCEN’s Regulations to Person Administering, Exchanging, or Using Virtual Currencies,” available at <https://www.fincen.gov/resources/statutes-regulations/guidance/application-fincens-regulations-persons-administering>.

typically accesses the wallet application by inputting a user-generated PIN code or password. Users can store, receive, and transfer cryptocurrencies via the application; however, many of these companies do not store or otherwise have access to their users' funds or the private keys that are necessary to access users' wallet applications. Rather, the private keys are stored on the device on which the wallet application is installed (or any digital or physical backup private key that the user creates). As a result, these companies generally cannot assist in seizing or otherwise restraining their users' cryptocurrency. Nevertheless, law enforcement could seize cryptocurrency from the user's wallet directly, such as by accessing the user's smart phone, accessing the wallet application, and transferring the cryptocurrency therein to a law enforcement-controlled wallet. Alternatively, where law enforcement has obtained the recovery seed for a "wallet" (as defined above), law enforcement may be able to use the recovery seed phrase to recover or reconstitute the wallet on a different digital device and subsequently transfer cryptocurrencies held within the new wallet to a law enforcement-controlled wallet.

COUNT 1
(NARCOTICS CONSPIRACY)

A. THE CONSPIRACY

Beginning on or about October, 2013 and continuing to and until the date of this Indictment, within the Southern District of Ohio and elsewhere, **KHLARI SIROTKIN a/k/a "Khlari Sirota," "Khlari Eleazor Isbell SIROTKIN," "Klizo," "Sirota," "Kliz," "Killa B," "Slanggang," and "@SlangGangRick;"** **KELLY STEPHENS a/k/a "Kelly E Stephens," "Kelly Shea," "Kelly Comatose," "Killa Kells," "Kel," "Slanggang," "@SlangGangRick," and "oxxymoron;"** **SEAN DEEVER a/k/a "Sean Deavers," "Sean Patrick Deaver," "Fatz," "Fats," "Phatz," "Interstatefatz," "PillCosby," and "Pill-Cosby;"** **ABBY JONES a/k/a "PillCosby," "Pill-Cosby," and "Abby Phatz;"** and **SASHA SIROTKIN a/k/a "Sasha Sirota,"**

the defendants herein, and others, did knowingly, willfully, intentionally, and unlawfully combine, conspire, confederate, and agree, and have a tacit understanding with each other, to commit offenses against the United States, to wit: to knowingly, willfully, intentionally and unlawfully possess with intent to distribute and to distribute four hundred (400) grams or more of mixtures or substances containing detectable amounts of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (hereinafter “fentanyl” at all times in this Indictment), a Schedule II Controlled Substance, to possess with intent to distribute and to distribute one hundred (100) grams or more of mixtures or substances containing detectable amounts of Heroin, a Schedule I Controlled Substance, to possess with intent to distribute and to distribute fifty (50) grams or more of mixtures or substances containing detectable amounts of Methamphetamine, a Schedule II Controlled Substance, and to possess with intent to distribute and to distribute five hundred (500) grams or more of mixtures or substances containing detectable amounts of Cocaine, a Schedule II Controlled Substance, all in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), (b)(1)(B) and (b)(1)(C).

B. GOALS OF THE CONSPIRACY

The *PC-SG* conspiracy functioned as a DTO. It was a goal of the conspiracy that, in order to obtain as much money and other things of value as possible, certain of the defendants and co-conspirators acquired fentanyl, heroin, and other illegal drugs, for the purpose of distribution throughout the United States, including to the Southern District of Ohio.

It was also a goal of the conspiracy that, in order to obtain money and other things of value for themselves, certain of the defendants and co-conspirators provided storage for, and thus aided in the manufacture and distribution of fentanyl mixtures, heroin mixtures, cocaine mixtures, methamphetamine mixtures and other illegal drugs; stored illicit proceeds gained from sales of such mixtures and other drugs; and engaged in financial transactions involving virtual currencies,

which had the effect of promoting, and did promote, the drug trafficking activities in this Indictment, in the Southern District of Ohio and elsewhere.

It was a goal of the conspiracy that, in order to obtain as much money and other things of value as possible, certain of the defendants and co-conspirators distributed those illegal drugs to, among other places, the Southern District of Ohio.

C. WAYS, MANNER, AND MEANS TO ACCOMPLISH THE CONSPIRACY

The ways, manner and means by which the co-conspirators operated their illegal drug trafficking organization, include, *but are not limited to* the following:

It was part of the conspiracy that certain defendants would, and did, play different roles in the conspiracy, perform different tasks and participate in the conduct of the organization through various criminal acts. The defendants made themselves and their services available at various times throughout the life of the conspiracy and participated in certain drug trafficking ventures as required to promote and protect the illegal drug distribution operation. The roles assumed by some defendants were interchangeable at various times throughout the conspiracy. Some of the roles assumed and carried out by the defendants included, among others, leader, supplier of drugs, packager, holder, intermediary, helper, stash house operator, facilitator, launderer of drug proceeds, and transporter/courier.

It was further part of the conspiracy that the defendants and co-conspirators used computers, cellular telephones, other electronic devices, and also motor vehicles to facilitate their illegal drug business.

It was further part of the conspiracy that fentanyl, heroin, cocaine, methamphetamine and other illegal drugs were obtained by the co-conspirators and advertised for sale on dark web

marketplaces through vendor accounts and other social media methods established by the co-conspirators for the sole purpose of facilitating their illegal drug business.

It was further part of the conspiracy that the co-conspirators transacted sales of their illegal narcotics using cryptocurrency (Bitcoin), and as necessary converted as much of that currency to fiat currency needed to maintain their lifestyles and to obtain goods and services, while the rest has been kept stored in digital wallets.

It was further part of the conspiracy that beginning in approximately October 2013, **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEEVER, ABBY JONES, and SASHA SIROTKIN** conspired together to operate the *PC-SG DTO*, which is an online poly-drug trafficking organization responsible for the manufacturing and distribution of controlled substances to individuals throughout the United States. During this span, **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEEVER, ABBY JONES, and SASHA SIROTKIN** (operating as the *PC-SG DTO*) based their operations from Las Vegas (Nevada), Los Angeles (California), Durango (Colorado), and Denver (Colorado). This multi-city-based DTO operated online via various dark web marketplaces and a Wickr chat room. The two marketplace vendor accounts operated were *PillCosby*⁵ and *Slanggang*, while the Wickr chat room operated was *Slanggangcentral*.⁶

It was further part of the conspiracy that **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEEVER, ABBY JONES, and SASHA SIROTKIN** conspired to distribute fentanyl, methamphetamine, heroin, and cocaine, among many other types of controlled substances, by

⁵ Slightly different versions of this name were used, such as, "*PillCosby*" and "*Pill-Cosby*."

⁶ Wickr is explained in more detail herein.

advertising for sale their products on the Dream, Wall Street, Silk Road 3.1, Nightmare, and Empire dark web marketplaces and from Wickr to customers all over the United States.

It was further part of the conspiracy that the *PC-SG DTO* advertised, manufactured, and distributed counterfeit drugs while intentionally mislabeling pills as oxycodone when they contained fentanyl. **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEEVER, ABBY JONES, and SASHA SIROTKIN** communicated with one another about packaging the drugs, ordering and purchasing shipping labels for drug packages, shipments of the drugs, responding to customer service issues for the organization, obfuscating cryptocurrency for the purpose of evading law enforcement detection, and transacting with various cryptocurrency, among many other duties.

It was further part of the conspiracy that **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEEVER, ABBY JONES, and SASHA SIROTKIN** work in concert with one another to operate both dark web vendor accounts, *PillCosby* and *Slanggang*, and *Slanggangcentral* Wickr room. Though the *PC-SG DTO* operates numerous online retail sites, **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEEVER, ABBY JONES, and SASHA SIROTKIN** are one-in-the-same organization, distributing the same drug product, displaying similar pricing model, sharing shipping resources, comingling their ill-gotten proceeds from cryptocurrencies, sharing account access, and converting their criminal proceeds in cryptocurrencies into United States Currency.

It was further part of the conspiracy that **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEEVER, ABBY JONES, and SASHA SIROTKIN** (as the *PC-SG DTO*) specialized in the manufacturing and distribution of pressed oxy[codone] pills, which proved to contain

detectable amounts of fentanyl. The *PC-SG DTO* advertised and distributed 30 milligram (mg) pressed oxy[codone] (A215) tablets⁷ and M 30 oxy[codone] tablets, both containing fentanyl.

D. OVERT ACTS

In furtherance of the conspiracy and in order to accomplish its objectives, the defendants, **KHLARI SIROTKIN** aka “**Khlari Sirota**,” “**Khlari Eleazor Isbell SIROTKIN**,” “**Klizo**,” “**Sirota**,” “**Kliz**,” “**Killa B**,” “**Slanggang**,” and “**@SlangGangRick**,” **KELLY STEPHENS** aka “**Kelly E Stephens**,” “**Kelly Shea**,” “**Kelly Comatose**,” “**Killa Kells**,” “**Kel**,” “**Slanggang**,” “**@SlangGangRick**” and “**oxxxymoron**,” **SEAN DEAVER** aka “**Sean Deavers**,” “**Sean Patrick Deaver**,” “**Fatz**,” “**Fats**,” “**Phatz**,” “**Interstatefatz**,” “**PillCosby**,” and “**Pill-Cosby**,” **ABBY JONES** aka “**PillCosby**,” “**Pill-Cosby**,” and “**Abby Phatz**,” and **SASHA SIROTKIN** aka “**Sasha Sirota**” committed acts and engaged in conduct which facilitated the objectives of the conspiracy, *including but not limited to the following*:

Establishment of Cryptocurrency Accounts

Members of the *PC-SG DTO* established accounts at various cryptocurrency exchanges located in the United States and elsewhere to aid in their concealment of criminal proceeds and to conduct drug transactions using cryptocurrency. **SASHA SIROTKIN** was the first of the defendants to establish a Coinbase account in October 2013 followed thereafter by **KHLARI SIROTKIN**, **ABBY JONES**, and **SEAN DEAVER**. The defendants used their Coinbase accounts, along with other accounts at similar institutions, to convert criminal proceeds into United States Currency or into various forms of cryptocurrency. Further, the defendants used these financial exchanges to co-mingle criminal proceeds derived from distributing drugs online.

⁷ According to the Hamilton County Ohio Laboratory, the approximate average weight of one of PC-SG DTO’s A 215 pressed oxycodone (established to be fentanyl) tablet equals approximately 0.109 grams.

Establishment of the *Pill-Cosby* and *Slanggang* Dream Marketplace Accounts

Dream Market was a dark web market in operation from approximately November 2013 continuing through approximately April 2019. In approximately October 2019, Dream had approximately 152,596 listings for illegal items, such as drugs, fraud, counterfeit items, and software and malware. Prospective vendors had to register with Dream and pay a fee to advertise their illicit goods. In April 2019, the administrators of Dream shut down the marketplace.

According to the Dream website, the moniker, "*Pill-Cosby*" registered as a vendor on August 9, 2017. *Pill-Cosby* listed the following illegal drugs on their "listings" page: 30mg Oxy[codone] (A215) for \$13.00 per pill, 25X [25 pills] Pressed Oxy[codone] (A215) for \$250.00, 50X [50 pills] Pressed Oxy[codone] 30mg (A215) for \$450.00, 100X [100 pills] Pressed Oxy[codone] (A215) for \$800, 1000X (1000 pills) Pressed Oxy[codone] (A215) for \$7,000.00, 50 30mg Oxy[codone] for \$31.50 each, 100 30mg Oxy[codone] for \$30 each. As of March 30, 2019, *Pill-Cosby* had 5,400 confirmed marketplace transactions with a 4.86/5.00 vendor profile rating. *Pill-Cosby* stated in their terms and conditions a minimum order constituted at least five (5) pills.

According to the Dream website, the moniker, "*Slanggang*" registered as a vendor on December 6, 2018. *Slanggang* had similar drug listings as *Pill-Cosby* had on Dream. As of June 2, 2019, *Slanggang* had 1,150 confirmed marketplace transactions with a 4.87/5.00 vendor profile rating. *Slanggang* stated in their terms and conditions a minimum order constituted at least ten (10) pills.

Establishment of the *Pill-Cosby* and *Slanggang* Empire Marketplace Accounts

The Empire marketplace has been in operation since early 2018. Empire is one of the current largest marketplaces in operation. In approximately October 2019, Empire had approximately 57,000 listings for illegal items, such as drugs, fraud, counterfeit items, and

software and malware. Prospective vendors had to register with Empire and pay a fee to advertise their illicit goods.

According to the Empire website, the moniker, “*Pill-Cosby*” registered as a vendor on April 22, 2019. *Pill-Cosby* listed the following illegal drugs on their “listings” page: 30mg Oxy[codone] (A215), 500+ [500 pills] (A215), Top Shelf Crystal Meth. As of October 8, 2019, *Pill-Cosby* had 684 confirmed marketplace transactions with a 99.84% positive feedback rating. *Pill-Cosby* stated in their terms and conditions a minimum order constituted at least five (5) pills regarding listing #1 (660 transactions). Listing #2 required a minimum order of 500 pills (20 transactions).

According to the Empire website, the moniker, “*Slanggang*” registered as a vendor on June 23, 2019. *Slanggang* listed the following illegal drugs on their “listings” page: 30mg Oxy[codone] for \$13 per pill, 11X [11 pills] for \$11.50 per pill, 500X [500 pills] for \$9 per pill. As of October 8, 2019, *Slanggang* had 1,053 confirmed marketplace transactions with a 99.45% positive feedback rating. *Slanggang* stated in their terms and conditions a minimum order constituted at least ten (10) pills.

Establishment of *Slanggangcentral* Wickr Room

Wickr is a well-known mobile instant messenger application that employs encrypted technology and content messages, including photos, videos, and file attachments, that expire after a pre-set time. In April 2019, *Slanggang* posted on their Empire “About” page, an alternate form of contact, “Wickr: @slanggangrick.” In approximately April 2019, an undercover employee (“UCE”) contacted @slanggangrick via Wickr. Following the contact, @slanggangrick added the UCE to the *Slanggangcentral* Wickr room. Additionally, @slanggangrick also provided another Wickr handle for communication, slanggang@protonmail.com.

A Wickr room is a feature within the Wickr platform that enables large groups of users to communicate with one another led by an administrator. In this instance, @slanggangrick created a Wickr room as an administrator; as such, @slanggangrick had leadership and control of user access to the room. Since May 2019, there have been at a minimum, 85 different Wickr customers participating in *Slanggangcentral* Wickr room for the purpose of purchasing and selling drugs from the *PC-SG DTO*. The *PC-SG DTO* established drug prices, terms of sale, shipping methods, discussion topics, and all forms of negotiations within the room. @slanggangrick posted wallet addresses routinely for customers to send cryptocurrency to in order to conduct a drug transactions. @slanggangrick polices the room and admonishes users for violating rules. @slanggangrick will remove users from the room if they violate the rules. For example, @slanggangrick forbids soliciting and for no more than five (5) posts per day per user. @slanggangrick will make posts in the Wickr room reinforcing customer requirements for ordering fentanyl pills. For example, on October 1, 2019, @slanggangrick stated they transact 30-50 orders daily between Empire and Wickr. Further, @slanggangrick stated there is a 10-pill minimum per order, as indicated below. Thus, @slanggangrick sold approximately 33,900 grams (33.9 kilos) of fentanyl between May 1, 2019 to September 30, 2019, which was calculated by multiplying a 10-pill minimum order by 30 orders daily minus weekends.

slanggangrick



hey folks last call for orders for today

2:19 pm (40) ✓

Announcement: the new min order is 10 pills. I know most all of you order larger then that but some times theres a few under and between empire and here im doing like 30-50 a day some times and so I need them to stay above a at least 10 to make it worth while an not bog down larger orders with micro orders like crazy. this is mostly a Empire issue but the rule applies here now as well

2:23 pm (40) ✓

Counterfeit Drugs Sold by PC-SG DTO

The *PC-SG DTO* manufactures and distributes “30mg pressed oxy[codone] (A 215) tablets and M 30 oxy[codone] tablets, which contain fentanyl. The *PC-SG DTO*’s “A 215” and “M 30” tablets have been found to be counterfeit and misbranded. A tablet imprint of “A 215” and “M 30” are associated with a 30 mg oxycodone HCL tablet sold by Actavis and Mallinckrodt Pharmaceuticals, respectively, and that oxycodone HCL is a Schedule II controlled substance.

October 2017 Creation of an iOS WhatsApp Group Instant Message Group

An iOS WhatsApp group message was created on or about October 27, 2017, and operated until on or about October 24, 2018, with 264 shared messages. The assigned users in this group were **KELLY STEPHENS** using (702) 349-7049, **ABBY JONES** using (702) 701-2532, **SEAN DEEVER** using (702) 960-6359, and **KHLARI SIROTKIN** using (702) 901-1148. During this group chat, **ABBY JONES** told **KHLARI SIROTKIN** that the “store” (dark web marketplace vendor account) was “set up.”

January 2018 Creation of an iOS WhatsApp Group Instant Message Group

An iOS WhatsApp group message was created on or about January 10, 2018, and operated until, on or about June 30, 2018, with 381 shared messages. The assigned users in this group were, **KELLY STEPHENS** using (702) 349-7049 and **ABBY JONES** using (702) 701-2532. During this group chat, **KELLY STEPHENS** told **ABBY JONES** that she is doing the “list,” referring to the online customer orders for drugs. **KELLY STEPHENS** followed by stating she was taking over the “orders” from **KHLARI SIROTKIN**. **ABBY JONES** stated she is waiting to do the “labels,” referring to shipping labels for the drug packages, until they receive the “inventory,” referring to drugs. **KELLY STEPHENS** further stated **KHLARI SIROTKIN** put money on her card and she intended to provide it to “Phatz,” referring to **SEAN DEEVER**. **ABBY JONES**

replied to contact **SEAN DEEVER** at (702) 960-6359, but that **SEAN DEEVER** “likes to talk on what’s app or in code.”

January 2018 Creation of the “Mofuckas” WhatsApp iOS Instant Messaging Group

An iOS WhatsApp group message was created on or about January 13, 2018, and operated until on or about April 3, 2018, with 36 shared messages, with the name of “Mofuckas.” The assigned users in this group were **KELLY STEPHENS** using (702) 349-7049, **ABBY JONES** using (702) 701-2532, and **SEAN DEEVER** using (702) 960-6359. During the session, **KELLY STEPHENS** stated she sent the “list,” referring to the online dark web marketplace customer ordering list. **SEAN DEEVER** in response stated, “All good...there is no product,” referring to drugs, and the orders will not be able to filled until Monday. **ABBY JONES** texted, “So we just need the quantity of the 30’s [Oxycodone 30mg] for those lists.” **SEAN DEEVER** later texted, “I’m pretty sure, so add the quantities ASAP on the oxy 30’s... for instance, if someone orders 50 oxy 30’s the list should say 50 R’s (R for Roxxy) if they order 50 M 30’s (which are more expensive) the list should say 50 M’s.

February 2018 Creation of an iOS WhatsApp Group Instant Message Group

An iOS WhatsApp group message was created on or about February 7, 2018, and operated until on or about October 12, 2018, with 2,226 shared messages. The assigned users in this group were **KELLY STEPHENS** using (702) 349-7049 and **KHLARI SIROTKIN** using (702) 569-9982. During the session, **KELLY STEPHENS** asked if another “account” could be established, referring to another dark web vendor account. **KELLY STEPHENS** later stated that “we” should use the “PC” account, which referred to the Pill-Cosby account. **KHLARI SIROTKIN** shared **SEAN DEEVER**’s Wells Fargo account, checking account number ending in 6941, for **KELLY STEPHENS** to send money to, in which **KELLY STEPHENS** stated she deposited “it.” Several

months later, in June 2018, **KHLARI SIROTKIN** told **KELLY STEPHENS** that the “only active ingredient is the fent[any].” **KELLY STEPHENS** later replied, “Why? I thought it doesn’t matter about the cops?” “They cant’s see my texts.”

February 2018 Creation of the “Mofuckas” WhatsApp iOS Instant Messaging Group

An iOS WhatsApp group message was created on or about February 9, 2018, and operated until on or about May 1, 2018, with 340 shared messages, with the name of “Mofuckas.” The assigned users in this group were **KELLY STEPHENS** using (702) 349-7049, **ABBY JONES** using (702) 701-2532, **SEAN DEAVER** using (702) 960-6359, and **KHLARI SIROTKIN** using (702) 569-9982. During the session, **KHLARI SIROTKIN** told the group “stamps” are finished, which referred to the shipping labels for the drug packages. **KHLARI SIROTKIN** later told the group that the “mixing” of “coins” is complete, which referred to the obfuscation of their cryptocurrencies. All four members of the chat discuss customer orders. For example, on March 1, 2018, **SEAN DEAVER** shared a customer order, “2 caps 10 caps Josh D. XXX xxxxxx Freemansburg, PA 1801.”

August 2018 Creation of an iOS WhatsApp Group Instant Message Group

An iOS iMessage chat was created on or about August 18, 2018, and operated until on or about August 23, 2019, with 5,755 shared messages. The assigned users in this group were **KHLARI SIROTKIN** using (310) 493-0342 and **SASHA SIROTKIN** using sashasirota@icloud.com. During the session, **KHLARI SIROTKIN** asked **SASHA SIROTKIN** for more money because he had “so many orders” and he is unable to “ship” them referring to customer orders for drugs from the PC-SG DTO online accounts. **KHLARI SIROTKIN** asked **SASHA SIROTKIN** to pay him via PayPal.

April 2019 Creation of an iOS WhatsApp Group Instant Message Group

An iOS WhatsApp group message was created on or about April 23, 2019, and operated until on or about July 25, 2019, with 3,997 shared messages. The assigned users in this group were, **KELLY STEPHENS** using (702) 349-7049 and **KHLARI SIROTKIN** using (310) 493-0342. During the session, **KHLARI SIROTKIN** and **KELLY STEPHENS** discuss fulfilling drug orders for customers. **KHLARI SIROTKIN** stated that “we’ll” go over to “Nightmare” and get the ones that are on there real quick and then we’ll go over to Empire,” which refers to the Nightmare and Empire dark web markets while “ones” refer to customer orders. **KHLARI SIROTKIN** stated on June 12, 2019, that he is making \$20,000 monthly and that he has “8k 30’s = \$80,000,” which refers to 8,000 30 mg tablets of fentanyl. In this same message **KHLARI SIROTKIN** further stated, “I got another brick that’ll make me another \$300,000 + that doesn’t even include my grow.” In this instance, a “brick” refers to a kilogram while the “grow” refers to **KHLARI SIROTKIN**’s recent purchase of a marijuana farm in Pueblo, Colorado. On June 17, 2019, **KELLY STEPHENS** asked **KHLARI SIROTKIN** which email to use for logging in to the site. **KHLARI SIROTKIN** replied, slanggang@protonmail.com, which is the same email used on *slanggangcentral* and by investigators to conduct undercover drug transactions with *Slanggang*. On June 18, 2019, **KHLARI SIROTKIN** stated, “I’m supposed to pay 25k to fatz,” which is an alias for **SEAN DEEVER**.

The Use of Amazon.com

The *PC-SG DTO* used Amazon.com to purchase drug paraphernalia and components for their clandestine laboratory used in the manufacturing and distribution of counterfeit drugs containing fentanyl. For example, in October 2017, an Amazon account associated with rossymommy@yahoo.com, an email account used by **SEAN DEEVER** and **ABBY JONES**,

was used to purchase numerous items associated with counterfeit drug manufacturing, packaging, and distribution, such as shipping labels, 2-way humidity control, and heat-sealing machine. These items were sent to “Abby Jones, 6774 Trammel Ct., Las Vegas, NV,” an address associated with **SEAN DEAVER** and **ABBY JONES**. The payment method used for these items was **KHLARI SIROTKIN**’s credit card ending in 0763. As another example, November 2018, an Amazon account associated with djcadzow@gmail.com, an email account associated with Demetra Isbell, **KHLARI SIROTKIN**’s mother was used to purchase numerous items associated with counterfeit drug manufacturing, packaging, distribution, and the concealment of cryptocurrency. A ledger cryptocurrency hard wallet was purchased and shipped to “Kelly Stephens, 200 Hoover Ave., Unit 1207, Las Vegas, NV,” which was an address associated with **KELLY STEPHENS** and **KHLARI SIROTKIN**. The payment method for this purchase was **KHLARI SIROTKIN**’s credit card ending in 0763. Additionally, in June and August of 2019, an Amazon account associated with KLIZOSIROTA@GMAIL.COM, which was an email account used by **KHLARI SIROTKIN**, was used to purchase numerous items associated with counterfeit drug manufacturing, packaging, and distribution. Approximately 500 mylar bags of varying sizes, 200 self-sealing bubble mailers, 1,200 printable shipping labels, and approximately 4.5 lbs of lactose monohydrate, an ingredient commonly used as a filler in the manufacture of tablets, were purchased and shipped to “Khlari Sirotkin, 5756 Craner Ave North Hollywood, CA”, which is an address associated with **SASHA SIROTKIN** and **KHLARI SIROTKIN**. The payment method for this purchase was **KHLARI SIROTKIN**’s credit cards ending in 9820 and 2562.

The Use of PayPal

The *PC-SG DTO* used PayPal to purchase drug paraphernalia and components for their clandestine laboratory, conceal proceeds derived from drug trafficking, and to fund the operation

of the DTO. For example, between January and May 2017, **KHLARI SIROTKIN** used his PayPal account ending in 4715 to purchase a 6mm Stamp Die Mold Die Punching for Tablet Press Machine, A215 Stamp Die Mold Die Punching for tablet Press Machine, and Handheld Manual Tablet Press Pill Maker from eBay, MeerKite Inc., and 义乌市宸季电子商务商行, respectively.

Further, two deposits for \$165.00 and \$1,000.00 on April 14, 2019 and April 16, 2019 were sent from **SASHA SIROTKIN**'s PayPal account to **KHLARI SIROTKIN**'s PayPal account for the purpose of day-to-day operations of the *PC-SG DTO*.

Controlled Purchases of Narcotics from the *PC-SG DTO*

On or about April 30, 2018, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 3 grams of heroin to an FBI Undercover Employee (UCE) in exchange for 0.02357 BTC (\$219.70), which was delivered to the Southern District of Ohio.

On or about June 29, 2018, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 50 pressed fentanyl tablets to an FBI UCE in exchange for 0.071 BTC (\$446.00), which was delivered to the Southern District of Ohio.

On or about September 22, 2018, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 3 grams of heroin to an FBI UCE in exchange for 0.0342 BTC (\$219.70), which was delivered to the Southern District of Ohio.

On or about October 6, 2018, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 3 grams of heroin to an FBI UCE in exchange for 0.0508 BTC (\$328.90), which was delivered to the Southern District of Ohio.

On or about October 26, 2018, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 3 grams of heroin to an FBI UCE in exchange for 0.03419 BTC (\$219.70), which was delivered to the Southern District of Ohio.

On or about November 13, 2018, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 25 pressed fentanyl tablets to an FBI UCE in exchange for 0.0451 BTC (\$290.00), which was delivered to the Southern District of Ohio.

On or about November 20, 2018, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 15 pressed fentanyl tablets to an FBI UCE in exchange for 0.0335 BTC (\$210.80), which was delivered to the Southern District of Ohio.

On or about December 11, 2018, *PC-SG DTO*, using the *Slanggang* vendor account on Dream dark web marketplace, provided at least 15 pressed fentanyl tablets to an FDA UCE in exchange for 0.0596000 (\$233.00), which was delivered to the Southern District of Illinois.

On or about April 13, 2019, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Wall Street dark web marketplace, provided at least 50 pressed fentanyl tablets to an FDA UCE in exchange for 0.10138728 (\$530.00), which was delivered to the Southern District of Illinois.

On or about May 10, 2019, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 37 grams of methamphetamine and 10 pressed fentanyl tablets to an FBI UCE in exchange for 0.1817 (\$955), which was delivered to the Southern District of Ohio.

On or about May 23, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 50 pressed fentanyl tablets to an FBI UCE in exchange for 0.13300 BTC (\$780), which was delivered to the Southern District of Ohio.

On or about June 27, 2019, *PC-SG DTO*, using the *Slanggang* vendor account on Empire, provided at least 103 pressed fentanyl tablets to an FDA UCE in exchange for 0.11251560 bitcoin (\$1,250.00), which was delivered to the Southern District of Ohio.

On or about July 1, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least five (5) grams of cocaine to an FBI UCE in exchange for 0.03375 BTC (\$430), which was delivered to the Southern District of Ohio.

On or about July 25, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 50 pressed fentanyl tablets to an FDA UCE in exchange for 0.01659500 (\$635.00), which was delivered to the Southern District of Ohio.

On or about July 25, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 50 pressed fentanyl tablets to an FBI UCE in exchange for 0.05905500 BTC (\$635.00), which was delivered to the District of Kansas.

On or about July 30, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 50 pressed fentanyl tablets to an FBI UCE in exchange for 0.07285 BTC (\$730), which was delivered to the Southern District of Ohio.

On or about August 8, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 50 pressed fentanyl tablets to an FDA UCE in exchange for 0.02236000 (\$260.00), which was delivered to the Southern District of Ohio.

On or about August 8, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 20 pressed fentanyl tablets to an FDA UCE in exchange for 0.02184000 (\$260.00), which was delivered to the District of Kansas.

On or about August 21, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 20 pressed fentanyl tablets to an FDA UCE in exchange for 0.01636836 (\$170.00), which was delivered to the District of Kansas.

On or about August 29, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 21 pressed fentanyl tablets to an FDA UCE

in exchange for 0.02009 (\$205.00). Investigators located in the Central District of California seized the parcel bearing the name and address of an FDA UCE, following the surveillance **KHLARI SIROTKIN** shipping the parcel, of which was destined for the Southern District of Ohio.

On or about September 10, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and *slanggang@protonmail.com* account, provided at least 18 pressed fentanyl tablets to an FDA UCE in exchange for 0.02548 (\$260.00), which was delivered to the Southern District of Ohio.

On or about September 10, 2019, a package was seized that was sent from Denver, Colorado to “SAMUEL Q. XXX xxxxxx DAYTON OH 45409-2619” (Southern District of Ohio) by **KHLARI SIROTKIN**. The package contained one (1) vacuum-sealed bag containing eleven (11) blue, round pills, each containing the imprint “A 215.”

On or about September 20, 2019, a package was seized that was sent from Denver, Colorado to “CY F. XXX xxxxxx CADDO TX 76429-8000” by **KELLY STEPHENS**. The package contained one (1) clear-plastic, vacuum-sealed bag and 23 round, blue pills with the imprint, “A 215.”

On or about October 3, 2019, a packaged was seized that was sent from Denver, Colorado, to “LORRIANE R. XXX xxxxxx WINONA MS 38967-1916” by **KHLARI SIROTKIN**. The package contained one (1) clear plastic FoodSavor vacuum/heat sealed bag containing round blue pills, with the imprint, “A 215.” The total drug package weight was 70.9 grams.

Slanggang's Pretty Good Privacy (PGP) Public Key

Pretty Good Privacy (PGP) encryption is an asymmetric encryption method that utilizes a pair of public and private keys. In PGP encryption, the public key is used to encrypt messages, which can only be decrypted using the corresponding private key and a password. In this encryption method, key owners make the public key available to anyone they wish to be able to

encrypt messages, which can only be decrypted using the private key and password. Owners of PGP keys generally keep their private keys and passwords secure because these are the only two pieces of information required to decrypt messages, which have been encrypted with the corresponding public key. PGP encryption to be widely used by individuals involved in the trafficking of drugs on dark web marketplaces in exchange for cryptocurrency.

On or about July 17, 2018, cryptoklizo@gmail.com, an email account used by **KHLARI SIROTKIN**, sent an email to kellycomatose@gmail.com, an email account used by **KELLY STEHPENS**, containing a single attachment bearing filename “SlangGang (0814031C) – Secret.ASC.” The file contained a PGP public and private encryption key pair. A hash value analysis was conducted comparing this public PGP key in “SlangGang (0814031C)” against the public PGP key for *Slanggang’s* Dream profile page on the Dream marketplace, which revealed an exact match.

Drug and Financial Ledgers

Numerous ledgers have been identified from **SEAN DEEVER** and **KHLARI SIROTKIN’s** accounts, which quantified the *PC-SG DTO* drug production capabilities and the financial profit derived from such activity.

SEAN DEAVER's Gmail account contained a drug ledger, as indicated below:

From Interstatefatz702 <interstatefatz@gmail.com> ☆ Subject Jan 23 - Feb 8 <hr/> Jan 23 - Feb 8 Total : \$18,930 Prod : \$8,755 Paid : \$8,133 C: total- \$4,160 prod- \$1,692 profit- \$2,468 B: total- \$7,640 prod- \$3,483 profit- \$4,157 30: total- \$7,130 prod- \$3,580 profit- \$3,580 (not including \$5 for M)	Feb 11 - Feb 22 Total : \$15,295 Prod : \$6,465 Paid : \$4,520 C: total- \$5,065 prod- \$1,985 profit- \$3,080 B: total- \$10,230 prod- \$4,475 profit- \$5,755 (Not including Xan profits) Jan 23 - Feb 22 Total Sales: \$34,225 Prod Cost: \$15,772 Total Sent (via BitPay): \$12,653 Total Profit: \$21,572
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As indicated in the image, **SEAN DEAVER** used code language, such as “C” to describe crystal methamphetamine, “B” for black tar heroin, “30” to describe 30mg pressed oxy[codone], and “Xan” for Xanax⁸. This ledger indicates the amount of production cost and the profit **SEAN DEAVER** has made from operating his portion of the *PC-SG DTO*.

Contained in **KHLARI SIROTKIN's** Apple Account:

KHLARI SIROTKIN participated in an SMS iMessage chat with **KELLY STEPHENS**.

KHLARI SIROTKIN described the financial ledger of the *PC-SG DTO*, as represented below:

6/12/2019	18:13:06	Kliz (+13104930342) [KHLARI SIROTKIN]	But for real I'm All ready pulling down 20k a month + I already have 8k 30's [30 mg pressed fentanyl pills] = \$80,000 And I just got another brick [kilogram] that'll make me another \$300,000 + and that doesn't even include my grow [marijuana farm that
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⁸ Xanax, or the generic form, alprazolam, is a benzodiazepine, which is a Scheduled IV Controlled Substance.

			KHLARI SIROTKIN purchased in Pueblo, CO]
6/16/2019	19:07:44	Kliz (+13104930342) [KHLARI SIROTKIN]	We gonna be so loaded!! Adam says the big ones [marijuana plant] will be 3lb ers and the smallest ones 2lb My cut is %20 of 3600 = 720 x 2.5 = 1800 x \$10000 = \$1.8million !!!!
6/17/2019	21:47:13	Local User [STEPHENS]	You're out of white? [Cocaine]
6/17/2019	21:47:17	Local User [STEPHENS]	New order for ½ g [Gram]
6/17/2019	21:47:42	Kliz (+13104930342) [KHLARI SIROTKIN]	Yeah don't add that to our shipping
6/17/2019	21:47:52	Kliz (+13104930342) [KHLARI SIROTKIN]	I just forward those orders to Jon now
6/18/2019	00:54:23	Kliz (+13104930342) [KHLARI SIROTKIN]	Possibly If u need me to Otherwise tomorrow or the next will be better I'm supposed to pay 25k to fatz [SEAN DEAVER] today and I'm really close so possibly I could do both
6/21/2019	02:50:16	Kliz (+13104930342) [KHLARI SIROTKIN]	Just Do the math if you get scared. The brick [kilogram] I just bought is going to make me a 30,000 pills [fentanyl pills] I still have 5000 from before

Fentanyl pill production recipe contained in **KHLARI SIROTKIN**'s Apple Notes:

◆ 1k Pill mix:

17.5 active

5 blue

70.5 white

8 Lactose

Total 101g

As indicated in the image, **KHLARI SIROTKIN** preserved the *PC-SG DTO* recipe for the manufacturing of pressed fentanyl pills. **KHLARI SIROTKIN** stated 17.5 grams of fentanyl were used to manufacture 1000 fentanyl pills (“PC-SG DTO’s “1000x pressed oxy[codone]”).

April 16, 2017 Photograph of a PC-SG DTO Pill Press Operation

KELLY STEPHENS' Google account contained the below photograph bearing file name "IMG_296.JPG," revealing a manner in which the PC-SG DTO manufactures pressed tablets.



The photograph's metadata revealed it was taken with an iPhone 7, on April 16, 2017, and contained GPS metadata, which indicated that the photo was taken in the area of, 2735 W Pebble Rd., Unit 313, Las Vegas, NV 89123-6567, an address associated with **KHLARI SIROTKIN**.

In violation of Title 21 United States Code, Section 846

COUNT 2

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF HEROIN)

On or about April 30, 2018, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN** aka "Khlari Sirota," "Khlari Eleazor Isbell SIROTKIN," "Klizo," "Sirota," "Kliz," "Killa B," "Slanggang," and "@SlangGangRick;" **KELLY STEPHENS** aka "Kelly E Stephens," "Kelly Shea," "Kelly Comatose," "Killa Kells," "Kel," "Slanggang," "@SlangGangRick" and "oxxymoron;" **SEAN DEAVER** aka "Sean Deavers," "Sean Patrick Deaver," "Fatz," "Fats," "Phatz," "Interstatefatz," "PillCosby," and "Pill-Cosby;" **ABBY JONES** aka "PillCosby," "Pill-Cosby," and "Abby Phatz;" and **SASHA SIROTKIN**

aka “Sasha Sirota” knowingly and intentionally distributed and attempted 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 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 3

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF FENTANYL)

On or about June 29, 2018, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN** aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,” “Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” **KELLY STEPHENS** aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,” “@SlangGangRick” and “oxxxymoron;” **SEAN DEAVER** aka “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;” **ABBY JONES** aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and **SASHA SIROTKIN** aka “Sasha Sirota” knowingly and intentionally distributed and attempted to distribute a mixture or substance containing a detectable amount of Fentanyl, a Schedule II Controlled Substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 4

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF HEROIN)

On or about September 22, 2018, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN** aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,” “Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” **KELLY STEPHENS** aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,” “@SlangGangRick” and “oxxxymoron;” **SEAN DEAVER** aka “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,”

and “Pill-Cosby;” ABBY JONES aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and SASHA SIROTKIN aka “Sasha Sirota” knowingly and intentionally distributed and attempted 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 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 5

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF HEROIN)

On or about October 6, 2018, in the Southern District of Ohio and elsewhere, defendants KHLARI SIROTKIN aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,” “Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” KELLY STEPHENS aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,” “@SlangGangRick” and “oxxxymoron;” SEAN DEAVER aka “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;” ABBY JONES aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and SASHA SIROTKIN aka “Sasha Sirota” knowingly and intentionally distributed and attempted 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 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 6

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF HEROIN)

On or about October 26, 2018, in the Southern District of Ohio and elsewhere, defendants KHLARI SIROTKIN aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,” “Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” KELLY STEPHENS aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,”

“@SlangGangRick” and “oxxymoron;” SEAN DEEVER aka “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;” ABBY JONES aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and SASHA SIROTKIN aka “Sasha Sirota” knowingly and intentionally distributed and attempted 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 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 7

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF FENTANYL)

On or about November 13, 2018, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,” “Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” KELLY STEPHENS aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,” “@SlangGangRick” and “oxxymoron;” SEAN DEEVER aka “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;” ABBY JONES aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and SASHA SIROTKIN aka “Sasha Sirota” knowingly and intentionally distributed and attempted to distribute a mixture or substance containing a detectable amount of Fentanyl, a Schedule II Controlled Substance.**

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 8

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF FENTANYL)

On or about November 20, 2018, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,”**

“Klizo,” “Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” KELLY STEPHENS aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,” “@SlangGangRick” and “oxxxymoron;” SEAN DEEVER aka “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;” ABBY JONES aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and SASHA SIROTKIN aka “Sasha Sirota” knowingly and intentionally distributed and attempted to distribute a mixture or substance containing a detectable amount of Fentanyl, a Schedule II Controlled Substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 9

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF FENTANYL)

On or about May 10, 2019, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,” “Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” KELLY STEPHENS aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,” “@SlangGangRick” and “oxxxymoron;” SEAN DEEVER aka “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;” ABBY JONES aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and SASHA SIROTKIN aka “Sasha Sirota” knowingly and intentionally distributed and attempted to distribute a mixture or substance containing a detectable amount of Fentanyl, a Schedule II Controlled Substance.**

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 10

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF METHAMPHETAMINE)

On or about May 10, 2019, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN** aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,” “Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” **KELLY STEPHENS** aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,” “@SlangGangRick” and “oxxymoron;” **SEAN DEEVER** aka “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;” **ABBY JONES** aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and **SASHA SIROTKIN** aka “Sasha Sirota” knowingly and intentionally distributed and attempted to distribute a mixture or substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 11

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF FENTANYL)

On or about May 23, 2019, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN** aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,” “Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” **KELLY STEPHENS** aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,” “@SlangGangRick” and “oxxymoron;” **SEAN DEEVER** aka “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;” **ABBY JONES** aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and **SASHA SIROTKIN**

aka “Sasha Sirota” knowingly and intentionally distributed and attempted to distribute a mixture or substance containing a detectable amount of Fentanyl, a Schedule II Controlled Substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 12

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF FENTANYL)

On or about June 27, 2019, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN** aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,” “Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” **KELLY STEPHENS** aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,” “@SlangGangRick” and “oxxxymoron;” **SEAN DEAVER** aka “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;” **ABBY JONES** aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and **SASHA SIROTKIN** aka “Sasha Sirota” knowingly and intentionally distributed and attempted to distribute a mixture or substance containing a detectable amount of Fentanyl, a Schedule II Controlled Substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 13

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF COCAINE)

On or about July 1, 2019, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN** aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,” “Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” **KELLY STEPHENS** aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,” “@SlangGangRick” and “oxxxymoron;” **SEAN DEAVER** aka “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;”

ABBY JONES aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and **SASHA SIROTKIN** aka “Sasha Sirota” knowingly and intentionally distributed and attempted to distribute a mixture or substance containing a detectable amount of Cocaine, a Schedule II Controlled Substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 14

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF FENTANYL)

On or about July 25, 2019, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN** aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,” “Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” **KELLY STEPHENS** aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,” “@SlangGangRick” and “oxxymoron;” **SEAN DEAVER** aka “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;” **ABBY JONES** aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and **SASHA SIROTKIN** aka “Sasha Sirota” knowingly and intentionally distributed and attempted to distribute a mixture or substance containing a detectable amount of Fentanyl, a Schedule II Controlled Substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 15

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF FENTANYL)

On or about July 30, 2019, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN** aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,” “Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” **KELLY STEPHENS** aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,” “@SlangGangRick” and “oxxymoron;” **SEAN DEAVER** aka “Sean Deavers,” “Sean

Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;”
ABBY JONES aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and SASHA SIROTKIN
aka “Sasha Sirota” knowingly and intentionally distributed and attempted to distribute a mixture
or substance containing a detectable amount of Fentanyl, a Schedule II Controlled Substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and
Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 16

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF FENTANYL)

On or about August 8, 2019, in the Southern District of Ohio and elsewhere, defendants
KHLARI SIROTKIN aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,”
“Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” KELLY STEPHENS
aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,”
“@SlangGangRick” and “oxxxymoron;” SEAN DEEVER aka “Sean Deavers,” “Sean
Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;”
ABBY JONES aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and SASHA SIROTKIN
aka “Sasha Sirota” knowingly and intentionally distributed and attempted to distribute a mixture
or substance containing a detectable amount of Fentanyl, a Schedule II Controlled Substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and
Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 17

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF FENTANYL)

On or about August 29, 2019, in the Southern District of Ohio and elsewhere, defendants
KHLARI SIROTKIN aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,”
“Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” KELLY STEPHENS
aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,”

“@SlangGangRick” and “oxxymoron;” SEAN DEEVER aka “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;” ABBY JONES aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and SASHA SIROTKIN aka “Sasha Sirota” knowingly and intentionally distributed and attempted to distribute a mixture or substance containing a detectable amount of Fentanyl, a Schedule II Controlled Substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 18

(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF FENTANYL)

On or about September 10, 2019, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN aka “Khlari Sirota,” “Khlari Eleazor Isbell SIROTKIN,” “Klizo,” “Sirota,” “Kliz,” “Killa B,” “Slanggang,” and “@SlangGangRick;” KELLY STEPHENS aka “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “Slanggang,” “@SlangGangRick” and “oxxymoron;” SEAN DEEVER aka “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “PillCosby,” and “Pill-Cosby;” ABBY JONES aka “PillCosby,” “Pill-Cosby,” and “Abby Phatz;” and SASHA SIROTKIN aka “Sasha Sirota” knowingly and intentionally distributed and attempted to distribute a mixture or substance containing a detectable amount of Fentanyl, a Schedule II Controlled Substance.**

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) and 846, and 18 U.S.C. § 2 and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 19

(SALE OF COUNTERFEIT DRUGS)

From an unknown date, but at least on or about April 24, 2018, and continuing until on or about September 10, 2019, in the Southern District of Ohio and elsewhere, defendants **KHLARI**

SIROTKIN aka “**Khlari Sirota**,” “**Khlari Eleazor Isbell SIROTKIN**,” “**Klizo**,” “**Sirota**,” “**Kliz**,” “**Killa B**,” “**Slanggang**,” and “**@SlangGangRick**,” **KELLY STEPHENS** aka “**Kelly E Stephens**,” “**Kelly Shea**,” “**Kelly Comatose**,” “**Killa Kells**,” “**Kel**,” “**Slanggang**,” “**@SlangGangRick**” and “**oxxxymoron**,” **SEAN DEEVER** aka “**Sean Deavers**,” “**Sean Patrick Deaver**,” “**Fatz**,” “**Fats**,” “**Phatz**,” “**Interstatefatz**,” “**PillCosby**,” and “**Pill-Cosby**,” **ABBY JONES** aka “**PillCosby**,” “**Pill-Cosby**,” and “**Abby Phatz**,” and **SASHA SIROTKIN** aka “**Sasha Sirota**” did knowingly, and with intent to defraud and mislead, and without authorization from Mallinckrodt, sell, dispense, and hold for sale and dispensing tablets bearing the markings of the FDA-approved Mallinckrodt Oxycodone HCL 30 mg tablets embossed on one side of each tablet with the letter “M,” and on the other side of each tablet, the number “30,” which were not manufactured by or under the authorization of Mallinckrodt, thereby causing the tablets to be counterfeit, as defined in Title 21, United States Code, Section 321 (g)(2).

In violation of Title 18, U.S.C. § 2 and Title 21, U.S.C. §§ 331(i)(3) and 333(b)(8) and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 20

(SALE OF COUNTERFEIT DRUGS)

From an unknown date, but at least on or about April 24, 2018, and continuing until on or about September 10, 2019, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN** aka “**Khlari Sirota**,” “**Khlari Eleazor Isbell SIROTKIN**,” “**Klizo**,” “**Sirota**,” “**Kliz**,” “**Killa B**,” “**Slanggang**,” and “**@SlangGangRick**,” **KELLY STEPHENS** aka “**Kelly E Stephens**,” “**Kelly Shea**,” “**Kelly Comatose**,” “**Killa Kells**,” “**Kel**,” “**Slanggang**,” “**@SlangGangRick**” and “**oxxxymoron**,” **SEAN DEEVER** aka “**Sean Deavers**,” “**Sean Patrick Deaver**,” “**Fatz**,” “**Fats**,” “**Phatz**,” “**Interstatefatz**,” “**PillCosby**,” and “**Pill-Cosby**,” **ABBY JONES** aka “**PillCosby**,” “**Pill-Cosby**,” and “**Abby Phatz**,” and **SASHA SIROTKIN**

aka “**Sasha Sirota**” did knowingly, and with intent to defraud and mislead, and without authorization from Actavis, sell, dispense, and hold for sale and dispensing tablets bearing the markings of the FDA-approved Actavis Oxycodone HCL 30 mg tablets embossed on one side of each tablet with the letter “A” and the number “215” separated by a half tablet score, which were not manufactured by or under the authorization of Actavis, thereby causing the tablets to be counterfeit, as defined in Title 21, United States Code, Section 321 (g)(2).

In violation of Title 18, U.S.C. § 2 and Title 21, U.S.C. §§ 331(i)(3) and 333(b)(8) and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 21

(CONSPIRACY TO COMMIT MONEY LAUNDERING)

INTRODUCTION

The allegations and definitions stated above are incorporated as if fully restated in this Count, and further, that:

From in and around October 2013 and continuing through the date of this Indictment, the defendants **KHLARI SIROTKIN** aka “**Khlar**i Sirota,” “**Khlar**i Eleazor Isbell **SIROTKIN**,” “**Klizo**,” “**Sirota**,” “**Kliz**,” “**Killa B**,” “**Slanggang**,” and “**@SlangGangRick**,” **KELLY STEPHENS** aka “**Kelly E Stephens**,” “**Kelly Shea**,” “**Kelly Comatose**,” “**Killa Kells**,” “**Kel**,” “**Slanggang**,” “**@SlangGangRick**” and “**oxxxymoron**,” **SEAN DEEVER** aka “**Sean Deavers**,” “**Sean Patrick Deaver**,” “**Fatz**,” “**Fats**,” “**Phatz**,” “**Interstatefatz**,” “**PillCosby**,” and “**Pill-Cosby**,” **ABBY JONES** aka “**PillCosby**,” “**Pill-Cosby**,” and “**Abby Phatz**,” and **SASHA SIROTKIN** aka “**Sasha Sirota**” conspired together to operate the *PC-SG DTO*, an online, poly-drug trafficking organization responsible for the manufacturing and distribution of over 10 kilograms of fentanyl and the distribution of over 1,000 grams of methamphetamine to individuals throughout the United States, as well as heroin, cocaine and other illegal drugs. During

this span, the defendants based their operations from Las Vegas (Nevada), Los Angeles (California), Durango (Colorado), and Denver (Colorado). This multi-city-based DTO operated online via various dark web marketplaces and a Wickr chat room. The two marketplace vendor accounts operated were called *Pill-Cosby* and *Slanggang*, while the Wickr chat room operated was called *Slanggangcentral*.

In exchange for the illegal narcotics distributed by the defendants, they received Bitcoin.

To conceal and disguise the nature and source of the illegal proceeds, the defendants transferred their profits from illegal narcotics sales from their Bitcoin wallet to other Bitcoin wallets controlled by the defendants. The defendants then transferred these funds through other cryptocurrency addresses and wallets controlled by the defendants before using multiple money laundering methods to convert their illicit proceeds into cash, and to accounts they controlled.

STATUTORY ALLEGATIONS

Beginning in and around October 2013 and continuing through the date of this Indictment, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN** aka “**Khleri Sirota**,” “**Khleri Eleazor Isbell SIROTKIN**,” “**Klizo**,” “**Sirota**,” “**Kliz**,” “**Killa B**,” “**Slanggang**,” and “**@SlangGangRick**,” **KELLY STEPHENS** aka “**Kelly E Stephens**,” “**Kelly Shea**,” “**Kelly Comatose**,” “**Killa Kells**,” “**Kel**,” “**Slanggang**,” “**@SlangGangRick**” and “**oxxymoron**,” **SEAN DEEVER** aka “**Sean Deavers**,” “**Sean Patrick Deaver**,” “**Fatz**,” “**Fats**,” “**Phatz**,” “**Interstatefatz**,” “**PillCosby**,” and “**Pill-Cosby**,” **ABBY JONES** aka “**PillCosby**,” “**Pill-Cosby**,” and “**Abby Phatz**,” and **SASHA SIROTKIN** aka “**Sasha Sirota**” did knowingly, intentionally and unlawfully conspire together with each other and with other persons known and unknown to the grand jury to commit certain offenses against the United States, that is, to knowingly conduct financial transactions affecting interstate and foreign commerce,

which transactions involved the proceeds of specified unlawful activity, knowing that the property involved in the transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

It is further alleged that the specified unlawful activity included: the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), punishable under the laws of the United States;

All in violation of Title 18, United States Code, Section 1956(h).

MANNER AND MEANS OF THE CONSPIRACY

SLANGGANGCENTRAL Wickr Room Payments

During all times relevant to the Indictment, dark web marketplaces operated on the “Tor” network, a computer network designed to facilitate anonymous communication over the Internet.

During all times relevant to the Indictment, the multi-city based, poly-drug *PC-SG DTO* operated online via various dark web marketplaces and a Wickr chat room. The two marketplace vendor accounts operated were, *PillCosby* and *Slanggang*, while the Wickr chat room operated was, *Slanggangcentral* (hereinafter collectively referred to as, “*PC-SG DTO*”).

Defendants **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEAVER, JONES, and SASHA SIROTKIN** were the primary operators and controllers of the *PC-SG DTO*.

From in and around April 2019 and continuing until the date of this Indictment, the Defendants operated a Wickr room known as *Slanggangcentral* for the purpose of distributing fentanyl.

The defendants grew and promoted the *Pill-Cosby* and *Slanggang* profile on various dark web marketplaces, through which they conducted illicit narcotics sales and directed loyal purchasers to the *Slanggangcentral* Wickr room, generating additional income for the defendants.

The defendants communicated regularly to facilitate their criminal enterprise. In furtherance of the conspiracy, **KHLARI SIROTKIN** claimed that he would launder proceeds of the drug sales in an effort to promote the narcotics trafficking conspiracy. Specifically, **KHLARI SIROTKIN** alleged he would “mix” the cryptocurrency, thereby obfuscating the proceeds of the narcotic transactions prior to purchasing shipping labels used to ship illicit narcotics through the mail.

From in and around April 2019 and continuing until the date of this Indictment, the defendants provided Bitcoin addresses as payment addresses within the *Slanggangcentral* Wickr room (herein, “*PC-SG* Wickr Addresses”). *Slanggangcentral* participants then sent bitcoin to the posted address to purchase controlled substances from the *PC-SG DTO*.

During the time period relevant to this Indictment and as described below, individuals in the Southern District of Ohio and elsewhere sent cryptocurrency to the *PC-SG* Wickr Addresses in order to purchase controlled substances.

Over the course of the conspiracy, the defendants subsequently laundered approximately \$2.8 million in furtherance of the drug trafficking activities referenced in this indictment.

From in or before October 2013 until the date of this Indictment, the defendants controlled various cryptocurrency addresses and wallets that they used to receive payments for sale of illicit narcotics via the *Slanggangcentral* Wickr Room and various dark web marketplaces. In seeking to conceal their illicit activities and protect their criminal enterprise and the illegal proceeds it

generated, the defendants engaged in a number of activities meant to conceal the location, source, and ownership of the illicit proceeds of narcotics sales.

Collectively, the defendants established numerous accounts at various cryptocurrency exchanges businesses around the world and employed multiple cash out methods. The defendants used these exchange accounts and various cash out methods in an effort to conceal the movement of their ill-gotten gains related to the *PC-SG DTO*.

Additionally, the defendants regularly suggested to their narcotic customers that the customers should use cryptocurrency mixing services in an effort to conceal the source of their funds.

Throughout the course of the conspiracy, the defendants then dispersed those funds through other cryptocurrency addresses and wallets before using multiple methods to convert their illicit proceeds into cash. These methods included, but were not limited to cryptocurrency exchanges, peer-to-peer transactions, prepaid debit cards, and cryptocurrency kiosks⁹.

Throughout the course of the conspiracy, the defendants held numerous accounts at the cryptocurrency exchanges and related companies to which they routed their ill-gotten gains. These accounts were held in the names of **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEEVER, ABBY JONES, and SASHA SIROTKIN.**

Relevant Wallets

PC-SG Wickr Addresses

At various times relevant to this Indictment, *PC-SG Wickr Addresses* sent illicit funds directly to WasabiWallet.io, which is a cryptocurrency wallet that provides built-in mixing

⁹ Cryptocurrency kiosks (commonly called “Virtual Currency automated teller machines (ATMs)” or “Virtual Currency vending machines”) are electronic terminals that act as mechanical agencies of the owner-operator, to enable the owner-operator to facilitate the exchange of virtual currency for currency or other virtual currency.

services using CoinJoin methodology¹⁰. According to WasabiWallet.io, the company “implements trustless coin-shuffling...over the Tor anonymity network.” Furthermore, the *PC-SG DTO* recommended using WasabiWallet.io on the *Slanggangcentral Wickr* room.

For example, the following transactions were sent directly from *PC-SG Wickr* Addresses to WasabiWallet.io over the course of three days:

Transaction Date	Bitcoin Value	Approximate USD Value
8/8/2019	0.1	\$1,181
8/8/2019	0.31884197	\$3,765
8/8/2019	0.2	\$2,362
8/8/2019	0.2	\$2,362
8/8/2019	0.02647605	\$312
8/9/2019	0.10550894	\$1,248
8/10/2019	0.05468001	\$633
8/10/2019	0.1496539	\$1,735
8/10/2019	0.0930264	\$1,078

At various times relevant to this Indictment, *PC-SG Wickr* Addresses sent approximately \$28,000 directly to Changelly.com, which allows users to instantly exchange between more than 150 different types of cryptocurrencies. This exchange is commonly used by individuals that want to make their cryptocurrency transactions more difficult for law enforcement to follow.

For example, the following transactions were sent directly from *PC-SG Wickr* Addresses to Changelly.com:

Transaction Date	Bitcoin Value	Approximate USD value
5/12/2019	0.34969149	\$2,499
7/16/2019	0.25758997	\$2,667
7/18/2019	0.22269661	\$2,236
7/20/2019	0.30034594	\$3,206
7/25/2019	0.47864993	\$4,796
8/3/2019	0.31717088	\$3,419

¹⁰ CoinJoin is a trustless method for combining multiple Bitcoin payments from multiple spenders into a single transaction to make it more difficult for outside parties to determine which spender paid which recipient or recipients.

8/5/2019	0.23695646	\$2,765
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The CRYPTOKLIZO@GMAIL.COM email account revealed the email was used to register an account at Changelly.com, which was used on several occasions at various times relevant to this indictment to exchange bitcoin for TRON, another cryptocurrency. Further, CRYPTOKLIZO@GMAIL.COM correspondence with Changelly.com Support included an attached image of a Nevada driver's license ending in 2550 in the name of **KHLARI SIROTKIN**.

At various times relevant to this Indictment, *PC-SG* Wickr Addresses sent illicit funds directly to several cryptocurrency exchange accounts and cryptocurrency kiosks. On average, cryptocurrency kiosks charge a significantly higher exchange rate than compliant US-based exchanges that conduct "know your customer" checks.

At various times relevant to this Indictment, *PC-SG* Wickr Addresses sent illicit funds directly to Binance.com account ending in 4324, registered using email address CRYPTOKLIZO@GMAIL.COM. Investigators requested a certified copy of these transactions from Binance.com.

At various times relevant to this Indictment, *PC-SG* Wickr Addresses sent illicit funds directly to two LocalBitcoins.com accounts. LocalBitcoins.com is the largest peer-to-peer cryptocurrency marketplace and commonly used by individuals that want to conceal their identities from exchanges that perform "know your customer" due diligence. The first account was registered with the username "DJ-cadzow," email address KLIZOB@GMAIL.COM, and phone number (702) 569-9982. The second account was registered with the username "K-swan," email address CRYPTOKLIZO@GMAIL.COM, and phone number (310) 493-0342. The "K-swan" account records also show a picture of Nevada driver's license ending in 2550 in the name of **KHLARI SIROTKIN**.

At various times relevant to this Indictment, *PC-SG* Wickr Addresses sent illicit funds directly to a CoinCloud cryptocurrency kiosk, specifically account number ending in 6490 in the name of **KHLARI SIROTKIN**. CoinCloud's website revealed that, on average, CoinCloud kiosks conduct transactions at a 10% – 15% exchange rate.

At various times relevant to this Indictment, *PC-SG* Wickr Addresses sent illicit funds directly to an identified Kraken.com, herein "Kraken Account 1".

At various times relevant to this Indictment, *PC-SG* Wickr Addresses sent illicit funds directly to an intermediary wallet (herein, "*PC-SG* Wallet 1".)

PC-SG Wallet 1

At various times relevant to this Indictment, *PC-SG* Wallet 1 also received funds directly from three large online dark web marketplaces where drugs are routinely bought and sold, Wall Street Market, Nightmare Market, and Silk Road 3.1. Further, at various times relevant to this indictment, *PC-SG* Wallet 1 received funds indirectly from Silk Road 3.1, Nightmare Market, Wall Street Market, Silk Road Market, and Empire Market. The *PC-SG DTO* stated on various public marketplace profiles to have been active on all of these markets.

At various times relevant to this Indictment, *PC-SG* Wallet 1 sent approximately \$70,000 directly to Changelly.com.

The *PC-SG DTO* also operated multiple accounts at a cryptocurrency service provider called BitPay that allows customers to load fiat currency onto pre-paid credit cards rather than send money directly to a bank account.

At various times relevant to this Indictment, *PC-SG* Wallet 1 sent illicit funds directly to load five BitPay Visa cards backed by accounts at FirstView Financial LLC.¹¹ First View Financial records show the following accounts are linked to those five BitPay Visa cards:

- a. Account ending in 04750 in the name of **KHLARI SIROTKIN** registered using email address **CRYPTOKLIZO@GMAIL.COM**;
- b. Account ending in 0528 in the name of **KELLY STEPHENS** registered using email **KELLYCOMATOSE@GMAIL.COM**;
- c. Account ending in 4676 in the name of **SASHA SIROTKIN** registered using email address **SASHASIROTA87@GMAIL.COM**; and
- d. A fourth account, hereinafter, "FirstView Account 4".

FirstView Financial, the entity that oversees the fulfillment of the prepaid Visa cards, records show the FirstView Financial account ending in 04750 received approximately \$25,590 in client-funded deposits and spent approximately \$24,941.56 in point of sale purchases.

FirstView Financial records showed FirstView Account 4 received approximately \$7,548 in client-funded deposits, and spent approximately \$3,841 in point of sale purchases, and approximately \$3,469.25 in domestic ATM withdrawals.

FirstView Financial records showed the account ending in 4676 received approximately \$13,813 in client-funded deposits and spent approximately \$6,219 in point of sale purchases and \$8,776 in domestic ATM withdrawals.

FirstView Financial records showed the account ending in 0528 received approximately \$103,599 in client-funded deposits and spent approximately \$36,529 in point of sale purchases and \$67,271 in domestic ATM withdrawals.

¹¹ FirstView Financial LLC is the program manager/card services provider for the BitPay prepaid Visa card. Customers can use BitPay to load their prepaid Visa card(s) with bitcoin, and then use the card like any traditional prepaid card.

At various times relevant to this Indictment, *PC-SG* Wallet 1 sent illicit funds directly to a LocalBitcoins.com account registered with the username "DJ-cadzow," email address KLIZOB@GMAIL.COM, and phone number 702-569-9982.

At various times relevant to this Indictment, *PC-SG* Wallet 1 sent illicit funds directly to CoinCloud cryptocurrency kiosk account ending in 6490, registered in the name of **KHLARI SIROTKIN**.

At various times relevant to this Indictment, *PC-SG* Wallet 1 sent illicit funds directly to WasabiWallet.io.

At various times relevant to this Indictment, *PC-SG* Wallet 1 sent illicit funds directly to additional intermediary wallets, (herein, "*PC-SG* Additional Wallets".)

PC-SG Additional Wallets.

At various times relevant to this Indictment, *PC-SG* Additional Wallets also received funds both directly and indirectly from several large online dark web marketplaces where drugs are routinely bought and sold, to include AlphaBay Market, Wall Street Market, Nucleus Market, Agora Market, Silk Road 3.1, Dream Market, Silk Road Market, Sheep Market, and Tochka Market. These dark web marketplaces were operating on Tor at various times between 2011 up until the date of this Indictment. The *PC-SG DTO* stated on various public marketplace profiles to have been active on all of these markets or have been active on various dark web marketplaces for years.

At various times relevant to this Indictment, *PC-SG* Wallet 1 sent approximately \$14,800 directly to Changelly.com. Further, Binance.com account number ending in 4324 registered using the email address CRYPTOKLIZO@GMAIL.COM and LocalBitcoins.com account registered

using the email address KLIZOB@GMAIL.COM and the username “DJ-cadzow” sent approximately \$8,000 to Changelly.com.

At various times relevant to this Indictment, *PC-SG* Additional Wallets sent illicit funds directly to load six BitPay Visa cards backed by accounts at FirstView Financial LLC. First View Financial records show the following accounts are linked to those six BitPay Visa cards:

- a. Account ending in 4750 in the name of **KHLARI SIROTKIN** registered using email address CRYPTOKLIZO@GMAIL.COM;
- b. Account ending in 0528 in the name of **KELLY STEPHENS** registered using email KELLYCOMATOSE@GMAIL.COM;
- c. Account ending in 4676 in the name of **SASHA SIROTKIN** registered using email address SASHASIROTA87@GMAIL.COM;
- d. Account ending in 8741 in the name of **KHLARI SIROTKIN**, registered using email address EBANK-MAIL@PROTONMAIL.COM; and
- e. Account ending in 0282 in the name of **KHLARI SIROTKIN**, registered using email address EBANK-MAIL@PROTONMAIL.COM.

In addition to the activity outlined above related to FirstView Financial accounts ending in 4750, 0528, 4676, and FirstView Account 4, FirstView Financial records showed account ending in 0282 received approximately \$57,872 in client-funded deposits and sent approximately \$4,069 in point of sale purchases and \$53,722 in domestic ATM withdrawals.

Furthermore, FirstView Financial records show account ending in 8741 received approximately \$104,582.28 in client-funded deposits and sent approximately \$10,062 in point of sale purchases and \$57,755 in domestic ATM withdrawals.

Communications between the *PC-SG DTO* indicate they used the BitPay Visa Card to fund the defendant’s lifestyle. Purchases included, but were not limited to food, transportation, electronics, phone accessories, and fuel and daily purchases.

At various times relevant to this Indictment, *PC-SG* Additional Wallets sent illicit funds directly to accounts at Coinbase, Inc. (“Coinbase”) in the name of **SASHA ISBELL-SIROTKIN**, **KHLARI SIROTKIN**, **ABBY JONES**, **SEAN DEAVER**, and two other Coinbase accounts, herein “Coinbase Account 6” and “Coinbase Account 7.” Additional funds from *PC-SG* Additional Wallets were sent to a Coinbase account registered using email address **MYDIGITALKIDS@GMAIL.COM**, which is known to be associated with **KHLARI SIROTKIN**.

At various times relevant to this Indictment, *PC-SG* Additional Wallets sent illicit funds directly to CoinCloud cryptocurrency kiosk account number ending in 6490, registered in the name of **KHLARI SIROTKIN**.

At various times relevant to this Indictment, *PC-SG* Additional Wallets sent illicit funds directly to a cryptocurrency kiosk account in the name of **SEAN DEAVER**. A review of this kiosk operator’s website revealed, on average, the kiosk operator charged an 8%-15% fee per transaction.

At various times relevant to this Indictment, *PC-SG* Additional Wallets sent illicit funds directly to a Binance.com account number ending in 4324 registered using the email address **CRYPTOKLIZO@GMAIL.COM**.

At various times relevant to this Indictment, *PC-SG* Additional Wallets sent illicit funds directly to a Bittrex.com account registered in the name **KHLARI ISBELL SIROTKIN** using the email address **PROTOMOLECULE1@PROTONMAIL.COM**.

At various times relevant to this Indictment, *PC-SG* Additional Wallets sent illicit funds directly to a LocalBitcoins.com account registered using the email address **KLIZOB@GMAIL.COM** and the username “DJ-cadzow.”

At various times relevant to this Indictment, *PC-SG* Additional Wallets sent illicit funds directly to Kraken Account 1.

At various times relevant to this Indictment, *PC-SG* Additional Wallets sent funds to, and received funds from, various additional exchange accounts in an effort to obfuscate the illicit nature of the funds received from *PC-SG* Additional Wallets.

Hansa Market Vendor Account

During the course of this conspiracy, the Bittrex.com account registered in the name of **KHLARI SIROTKIN** using email address **PROTOMOLECULE1@PROTONMAIL.COM** received funds directly from Hansa Market.

On July 20, 2017, the National Police of the Netherlands (NPN) concluded an operation in which they ultimately took Hansa Market offline. During the course of the operation, the NPN seized Hansa Market infrastructure. As a result of that seizure, the NPN gained access to evidence regarding individuals conducting illicit activity on Hansa Market. Specifically, the NPN obtained evidence of account activity, which included moniker, sales of illicit goods and services, and Bitcoin transaction information. The NPN provided this evidence to United States authorities.

According to the Bitcoin transaction information recorded in the Hansa Market data, Hansa Market vendor “MedicinalMary” initiated the direct deposit into **KHLARI SIROTKIN**’s Bittrex.com account. Additional review of the withdrawals from the “MedicinalMary” Hansa Market account revealed direct deposits into a Poloniex.com account in the name of **KHLARI SIROTKIN**, registered using email address **CRYPTO-BANKING@PROTONMAIL.COM**.

Hansa Market vendor “MedicinalMary” registered to Hansa Market on March 26. The “MedicinalMary” vendor page stated that the vendor had been involved with dark web marketplaces “since the SR1 [Silk Road] days” and was, in addition to Hansa Market, selling on

Dream Market, AlphaBay Market, Nucleus Market, Dr. D's Market, Valhalla, Python, and Outlaw Market. During the vendor's tenure on Hansa Market, the profile listed various illicit narcotics, to include oxycodone pills, ecstasy and pressed ecstasy, marijuana, edibles, and MDMA. The vendor conducted approximately \$5,394 worth of illicit sales based on these listings.

Transactions in the Southern District of Ohio

Each of the funds for the following undercover purchases were sent to the *PC-SG Wickr* Addresses posted in the *Slanggangcentral* Wickr room by the PC-SG DTO:

- a. On May 23, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 50 pressed fentanyl to an FBI UCE located in the Southern District of Ohio in exchange for .13300 BTC (\$780), which was delivered to the Southern District of Ohio.
- b. On June 27, 2019, *PC-SG DTO*, using the *Slanggang* vendor account on Empire, provided at least 103 pressed fentanyl tablets to an FDA UCE in exchange for 0.11251560 bitcoin (\$1,250.00), which was delivered to the Southern District of Ohio.
- c. On July 1, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least five (5) grams of cocaine to an FBI UCE located in the Southern District of Ohio in exchange for .03375 BTC (\$430.00), which was delivered to the Southern District of Ohio.
- d. On July 25, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 50 pressed fentanyl to an FDA UCE in exchange for 0.01659500 (\$635.00), which was delivered to the Southern District of Ohio.
- e. On July 30, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 50 pressed fentanyl to an FBI UCE located in the Southern District of Ohio in exchange

for .07285 BTC (\$730), which was delivered to the Southern District of Ohio.

- f. On August 8, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 50 pressed fentanyl to an FDA UCE in exchange for 0.02236000 (\$260.00), which was delivered to the Southern District of Ohio.
- g. On August 29, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 21 pressed fentanyl, in exchange for 0.02009 (\$205.00), to the United States Postal Service, within a parcel bearing the name and address of an FDA UCE, which was destined for the Southern District of Ohio.
- h. On September 10, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 18 pressed fentanyl to an FDA UCE in exchange for 0.02548 (\$260.00), which was delivered to the Southern District of Ohio.

Statements in Furtherance of the Conspiracy

Rather than send funds directly to one another via check or wire, the defendants engaged in a process involving multiple transactions, accounts, withdrawals, and circuitous methods of payment in an effort designed to conceal the source of their funds.

KELLY STEPHENS discussed ATM withdrawal limits and meeting up to hand over cash to **SEAN DEAVER** on and around November 8, 2018.

KELLY STEPHENS	Fosho, I gotta go to chase or something cus Wells has only been letting me pull 900
SEAN DEAVER	Chase too... gotta fuck wit US BANK
KELLY STEPHENS	Damn for real? Ok coo I'll try US bank
SEAN DEAVER	Thanks Killa Kellz
KELLY STEPHENS	Got you
KELLY STEPHENS	Hey I'm headed back just gonna shower then go to the bank

SEAN DEAVER	Ok, call me when u are done at the bank, and I'll come to u
KELLY STEPHENS	Kk
KELLY STEPHENS	Guessing I'm pulling the whole 3 out?
SEAN DEAVER	Yes please
KELLY STEPHENS	Kk
KELLY STEPHENS	So chase has a limit now too, I just got 8 out of them, going to ya bank then wells
KELLY STEPHENS	Looks like all the banks have a cash limit now 🐢🐢🐢🐢
SEAN DEAVER	That's what I said... US BANK
SEAN DEAVER	US BANK still let's u get it all
KELLY STEPHENS	Yeah they're letting me, I'm gunna hit it til it cut me off
KELLY STEPHENS	K I have 28 for you
KELLY STEPHENS	Heading back now, hmu when you're downstairs
SEAN DEAVER	Thanks... I'm bout to eat real quick then be on my way
KELLY STEPHENS	Fosho, there's still 2 in my bit but it didn't let me take anymore out. I can get the rest tomorrow I gues s
KELLY STEPHENS	I'm gunna try wells first tho

FirstView Financial records for the account ending in 0528 in the name of **KELLY STEPHENS** show ten ATM withdrawals for \$200, \$203, \$300, or \$303 within a ten-minute timeframe, totaling \$2,809. At the end of November 8, 2019, FirstView Financial records for the account ending in 0528 in the name of **KELLY STEPHENS** show the balance for the account to be \$206.60.

KHLARI SIROTKIN sent the following message to **KELLY STEPHENS** in June 2019, "Actually had to use pretty much all I had to buy that thing and also pay some debt back But I got about 10,000 in escrow between the two sites and also my wicker account so some more coin should come at Anytime it just hasn't yet...Soon as it does though I'll load you up". Later that same day, **KHLARI SIROTKIN** sent a follow up message to stating, "Just Do the math if you

get scared. The brick I just bought is going to make me a 30,000 pills I still have 5000 from before...And then at the end of the summer big payday...Oh hey btw just out 500 on the bitpay for ya baby p...I'll load up some more tomorrow to.”

KELLY STEPHENS requested funds from **KHLARI SIROTKIN** on June 22, 2019. **KHLARI SIROTKIN** responded, “I’ll mix some coins for right now :)” That same day, FirstView Financial records for the account ending in 0528 in the name of **KELLY STEPHENS** show a client-funded deposit for \$1,000.

KELLY STEPHENS asked **KHLARI SIROTKIN** “There’s money on the card right?” on June 23, 2019. **KHLARI SIROTKIN** responded “Yeah there’s 1k on there rn...Mixing more as we speak”. FirstView Financial records for the account ending in 0528 in the name of **KELLY STEPHENS** show a balance of \$1,010 at the end of the day on June 22, 2019. The following day, FirstView Financial records for the account ending in 0528 in the name of **KELLY STEPHENS** show a client-funded deposit for \$835.

KELLY STEPHENS received a text from **KHLARI SIROTKIN** in June 2019 stating “Okay so we need to get some funds into ur account then I can go to a BTC atm after work today and then make a deposit for ya”.

KELLY STEPHENS sent a message to **ABBY JONES** in March 2018 stating, in reference to **KHLARI SIROTKIN**, “He said he’s waiting for coin to clear, shouldn’t be too much longer now :)”.

ABBY JONES sent a message to **KELLY STEPHENS** in April 2018, stating, “Hey girl. Did you talk to K [**KHLARI SIROTKIN**]? We are Gonna get the computer for a couple of weeks to do the store and then get our own after we recoup \$”

KELLY STEPHENS sent a message to **ABBY JONES** in April 2018 stating, “Hey what’s up, I see the transaction in my BitPay, soon as it’s confirmed than I’ll go to the bank and meet up with you”. Later that same day, **ABBY JONES** responded “Hey Fatz is going to meet you so check with him k”.

KELLY STEPHENS sent a message to **ABBY JONES** in January 2018 stating, “Hey babe Kliz [**KHLARI SIROTKIN**] is putting money on my card, I’m gunna drain it and give it to Phatz [**SEAN DEEVER**] with some zans [Xanax] too, where does he want me to meet him”. **ABBY JONES** responded, “He’s at the Boulevard Mall until two today...Call him at [phone number ending in 6359]. He likes to talk on what’s app or in code...I just talked to him. He said give him a call when you’re ready to meet and he will meet you wherever.” That same day, **SEAN DEEVER** responded to a message from **KELLY STEPHENS** asking where to meet him after **KHLARI SIROTKIN** had put “money in my wallet”, stating, “As soon as u have it, let me know, and we can meet wherever is convenient... I’m gonna be all over today, so as soon as it’s in hand, I’ll come wherever u are. Thanks Killa Kells.” FirstView Financial records for the account ending in 0528 in the name of **KELLY STEPHENS** show three client-funded deposits to the Visa card within one hour on 12 January 2018. Later that same day, FirstView Financial records for the account ending in 0528 in the name of **KELLY STEPHENS** show ten ATM withdrawals, each for \$303, within an eight-minute timeframe, totaling \$2,830.

KHLARI SIROTKIN sent the following message to a group chat consisting of **SEAN DEEVER**, **KELLY STEPHENS**, and **ABBY JONES** in February 2018, “Hey guys sorry just waiting for the site to come back online so I went down in the middle of the night while I was working on the list. Tons of orders today and lots of coin...going to be a good day all the way around”.

ABBY JONES sent the following message to the same group chat consisting of the defendants in March 2018, “Hey guys!!!! 6:30 goal for labels to be done. In case you need to prep because it’s going to be like 8,058\$”.

KHLARI SIROTKIN sent a message to the same group chat in February 2018 stating, “Second-half just got sent. Going to go work on mixing coins for stamps now”.

ABBY JONES complained to **KELLY STEPHENS** about **KHLARI SIROTKIN**’s dispensing of their illicit proceeds in March 2018 stating, “I really think he [**KHLARI SIROTKIN**] must be stealing money from everyone [...] Is there 30k I’m in the site? Because Fatz [**SEAN DEEVER**] owes someone 20k, 10 is his.” **ABBY JONES**’ statements indicate a mutual and joint interest amongst members of the *PC-SG DTO* in the illicit proceeds.

KHLARI SIROTKIN sent a message to **SEAN DEEVER** in May 2018 in response to a YouTube video discussing cryptocurrency transaction analysis, “Shit like this is why it’s so important to use a Tumblr and proper operational security. Our process as soon as this technology already exists and even though it’s not good monopolized it’s definitely been a function possibility for a long time. Just don’t deviate from the system at all And you’ll be good I promise[.] But I do suggest that you do like we were talking about and start spreading it out more[.] Hit me up if you want to chop it up More about that anytime”.

KHLARI SIROTKIN and **SEAN DEEVER** discussed operational security related to cryptocurrency accounts in and around May 2018:

SEAN DEEVER	I made a mistake and sent some coin directly to my wallet today... I thought I hit the tumbler option
KHLARI SIROTKIN	Na don’t worry bout it
KHLARI SIROTKIN	That wallet isn’t attached to your name only once you load it onto your card is it synced to a name at all

KHLARI SIROTKIN	If you want you can even use your Bitcoin address of your binance account as a mixer
KHLARI SIROTKIN	Or local BTC could work as well
SEAN DEEVER	Oh yeah
SEAN DEEVER	I'm gonna figure it out... I started a new bitpay, and I think I did under my name ☐
KHLARI SIROTKIN	Totally. They charge as well when you withdraw it out of there and I believe it's about 1% or 2% as well
KHLARI SIROTKIN	It's OK don't stress. Just a one time is not gonna get you caught up
SEAN DEEVER	Aight
SEAN DEEVER	I need to tighten up...
KHLARI SIROTKIN	I feel ya. If you wanted you could take those coins send them to your local bitcoin account that we start tomorrow and sell them to a stranger in person somewhere in Vegas and I will be a full wash

In violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION 1

Upon conviction of one or more of the offenses set forth in Counts 1 through 18 of this Indictment, defendants **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEEVER, ABBY JONES, and SASHA SIROTKIN** shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation(s), and (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation(s), including but not limited to, the following:

- (a) 2017 Nissan Maxima, VIN 1N4AA6AP5HC413807, with all attachments thereon;
- (b) 2013 Jeep Wrangler Unlimited Sahara 4WD, VIN 1C4BJWEG0DL666097, with all attachments thereon; and
- (c) Contents of the cryptocurrency accounts listed below in Forfeiture Allegation 2.

FORFEITURE ALLEGATION 2

Upon conviction of the offense set forth in Count 21 of this Indictment, defendants **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEAVER, ABBY JONES, and SASHA SIROTKIN** shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in the offense, or any property traceable to such property, including but not limited to, the following:

- (a) Contents of accounts associated with CRYPTOKLIZO@GMAIL.COM at Binance.com;
- (b) Contents of accounts associated with KHLARI ISBELL SIROTKIN and/or PROTOMOLECULE1@PROTONMAIL.COM at Bittrex.com;
- (c) Contents of accounts associated with SASHA ISBELL-SIROTKIN and/or SASHASIROTA87@GMAIL.COM at Coinbase.com;
- (d) Contents of accounts associated with Coinbase Account 6 at Coinbase.com;
- (e) Contents of accounts associated with ABBY JONES and/or ROSSYMOMMY@YAHOO.COM at Coinbase.com;
- (f) Contents of accounts associated with SEAN DEAVER and/or INTERSTATEFATZ@GMAIL.COM at Coinbase.com;
- (g) Contents of accounts associated with Coinbase Account 7 at Coinbase.com;
- (h) Contents of accounts associated with KLIZ and/or MYDIGITALKIDS@GMAIL.COM at Coinbase.com;
- (i) Contents of accounts associated with Kraken Account 1 at Kraken.com (Operated by Payward Ventures, LTD);
- (j) Contents of accounts associated with KHLARI SIROTKIN, “K-Swan,” and/or CRYPTOKLIZO@GMAIL.COM at LocalBitcoins.com;
- (k) Contents of accounts associated with “DJ-cadzow,” and/or DJCADZOW@GMAIL.COM at LocalBitcoins.com;
- (l) Contents of accounts associated with KHLARI SIROTKIN and/or CRYPTO-BANKING@PROTONMAIL.COM at Poloniex.com (Operated by Circle Financial);

- (m) Contents of accounts associated with KHLARI SIROTKIN, EBANK-MAIL@PROTONMAIL.COM and/or CRYPTOKLIZO@GMAIL.COM at FirstView Financial;
- (n) Contents of accounts associated with KELLY STEPHENS and/or KELLYCOMATOSE@GMAIL.COM at FirstView Financial;
- (o) Contents of accounts associated with SASHA SIROTKIN and/or SASHASIROTA87@GMAIL.COM at FirstView Financial;
- (p) Contents of accounts associated with FirstView Account 4 at FirstView Financial;
- (q) Contents of cryptocurrency wallets belonging to the defendants, SASHA SIROTKIN, KELLY STEPHENS, SEAN DEAVER, ABBY JONES, and SASHA SIROTA; and
- (r) A sum of money equal to at least \$1,100,000, which represents the amount of money involved in the offense.

SUBSTITUTE ASSETS

If any of the above-described forfeitable property in Forfeiture Allegations 1 and 2, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) or as incorporated by 18 U.S.C. § 982(b)(1), to seek forfeiture of any other property of the defendants up to the value of the above-described forfeitable property.

A True Bill.



Grand Jury Foreperson


DAVID M. DEVILLERS
United States Attorney

KARL P. KADON
Assistant United States Attorney
Organized Crime Drug Enforcement Task Force