

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-8160-BER

UNITED STATES OF AMERICA,

v.

VANESSA VANLY KAISER, and
RONALD ROBERT KAISER,

Defendants.

/

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? NO
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? NO
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? NO
4. Did this matter involve the participation of or consultation now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? NO

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By: 

DANIEL E. FUNK

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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the Southern District of Florida

United States of America
v.
VANESSA VANLY KAISER, and
RONALD ROBERT KAISER,
Defendant(s)

Case No. 24-8160-BER

FILED BY TM D.C.
Apr 4, 2024
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - WPB

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2022 to June 29, 2023 in the county of Palm Beach in the Southern District of Florida, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Row 1: 21 U.S.C. § 841(a)(1), 846, and 841(b)(1)(B)(viii); Conspiracy to possess with intent to distribute a controlled substance (50 grams or more of a mixture or substance containing a detectable amount of methamphetamine)

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.

Complainant's signature

DEA TFO TYLER WITT
Printed name and title

Sworn to me via Telephone-FaceTime by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1.

Date:

Digitally signed by Bruce Reinhart
Date: 2024.04.04 10:40:24 -04'00'

Judge's signature

City and state: West Palm Beach, FL

BRUCE E. REINHART, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, Tyler Witt, being duly sworn, declare and state as follows:

Introduction

1. I am a deputized Task Force Officer (TFO) assigned to the Miami Field Division, West Palm Beach District Office of the Drug Enforcement Administration (DEA). I have been a TFO since September 2020, and I am a Law Enforcement Officer within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516(1) and in Title 21, United States Code, Section 878.

2. This affidavit is submitted in support of a criminal complaint and arrest warrant charging Ronald Robert KAISER and Vanessa Vanly KAISER with conspiracy to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 846 and 841(b)(1)(B)(viii) (50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers). Evidence discovered during this investigation has shown that controlled substances were distributed to locations in Palm Beach County, in the Southern District of Florida, during and in furtherance of the conspiracy.

3. I am currently assigned to investigations dealing with all aspects of importation, manufacturing, and distribution of illegal drugs, to include heroin, cocaine hydrochloride, “crack” cocaine, methamphetamine, and fentanyl. In addition to being a Task Force Officer with DEA, I am a sworn police officer with the Palm Beach Gardens Police Department and have been employed as such since 2018. I have successfully completed the Criminal Justice Standards and Training Police Academy and I am a certified law enforcement officer. Prior to working for the

Palm Beach Gardens Police Department, I was employed as a certified Deputy Sheriff from 2014 through 2018 with the St. Lucie County Sheriff's Office. In total, I have been in law enforcement for ten years. During those ten years, I have received advanced training at courses including, but not limited to, Field Training Officer, Large Truck and Bus Enforcement and Interdiction, Marijuana Impaired Driving Detection and Enforcement, Traffic Homicide Investigations, Interview and Interrogations, Introduction to Clandestine Laboratories Investigation, Drug Identification Course, Overview of the Illicit Drug Trade, Introduction to Narcoterrorism, Surveillance Operation Overview, Patrol Drug Investigation, Highway Rural Drug Investigation, Introduction to Money Laundering, and numerous Gang Investigation Courses. Based upon this experience, and through the experience of other senior agents and detectives with numerous years of experience, I have become versed in the methodology used in illegal narcotics trafficking and the unique patterns employed by narcotics organizations.

4. The information contained in this affidavit is based on my own personal knowledge, as well as information provided to me by other law enforcement officers and agents. This affidavit is submitted for the limited purpose of establishing probable cause. It does not describe everything known to me concerning the investigation.

PROBABLE CAUSE

Background of Investigation

5. Since 2021, federal agents have been investigating an international drug trafficking organization ("DTO") which has been shipping various controlled substances into the United States. Some of the controlled substances have included zolpidem, tramadol, tapentadol, and methamphetamine. Some of the pills are counterfeit and contain a different controlled substance than the actual pharmaceutical. For example, "Adderall" being sold by the DTO has contained

methamphetamine. Bulk quantities of drugs are sent to “re-shippers” in the United States. After receiving orders from web sites controlled by the DTO, the DTO directs re-shippers to package and ship the controlled substances to customers. The orders are filled without a valid prescription or required drug labeling.

6. Using various investigative techniques, including search warrants, undercover purchases, and suspect interviews, agents have identified other members of the DTO, including leader/organizers. Based upon interviews and evidence recovered through search warrants, agents believe India is the location where the DTO carries out the executive functions of marketing, customer service, pharmaceutical acquisition, and bulk distribution to re-shippers. Members of the DTO in India send re-shippers located in the United States lists of customer orders which include the drug quantities and customer addresses.

7. During searches at re-shippers’ residences in Michigan, Virginia, Florida, North Carolina, New York, and South Carolina, agents have seized hundreds of thousands of various pharmaceutical substances, ranging from non-scheduled substances to schedule II opioids. Through these seizures, agents have also recovered counterfeit pills, including pills with markings consistent with Oxycodone, Xanax, and Adderall that, through subsequent lab testing, have been found to contain fentanyl and/or methamphetamine. On some occasions, pills were discovered that contained no controlled substance.

8. Agents have also determined that some re-shippers act as money launderers for the DTO. Evidence obtained through interviews, search warrants, and subpoenas has revealed that money launderers receive customer payments for orders, often through online payment applications, such as PayPal, Venmo, and Zelle, and then funnel the money through other financial accounts. The proceeds are either sent to the DTO leader in India or to other people at the direction

of the DTO leader. Based on these searches, agents know that members conducting shipping for this conspiracy conducting shipping often use their personal residences in furtherance of the conspiracy to store controlled substances, keep packaging materials, and maintain shipping and/or payment records.

9. Agents have been able to further identify certain ways this DTO operates. For example, agents learned that shipments are often sent using the United States mail; that the DTO uses electronic, online drug ledgers to keep track of orders; and that DTO members frequently use WhatsApp to communicate with DTO leaders about orders, shipping instructions, and payment information.

Investigation of Ronald and Vanessa Kaiser

10. Through court-authorized pen register / trap and trace orders, agents determined that members of the DTO were communicating with re-shippers in the United States. Agents were able to see evidence of communications with telephone numbers ending in 4184, 9559, and 1443. The contact occurred on a frequent basis.

11. Through law enforcement databases and other open-source searches, agents learned that the number ending in 4184 is serviced by Verizon Wireless. Records from Verizon Wireless for the number ending in 4184, obtained in October 2022, listed "Ronald R Kaiser" as the subscriber. The subscriber records further listed the "Work Phone" for Ronald KAISER as the number ending in 9559. Additionally, through law enforcement databases and other open-source searches, the number ending in 1443 also is serviced by Verizon Wireless. Open-source databases show that the number ending in 1443 is associated with the daughter of Venessa KAISER.

12. During this investigation, agents have obtained and executed search warrants on Google accounts controlled by the DTO. While reviewing records obtained from a Google account,

agents found various drug ledger spreadsheets with shipping dates, suspected customer names, suspected customer addresses, substances, quantity of substances, prices of substances, tracking numbers associated with orders, and payment information. In one of the drug ledger spreadsheets found in the Google account, entries indicate Ronald KAISER previously paid DTO members and received controlled substances.

13. For instance, one drug ledger spreadsheet had an entry dated “25-01-2022” with the name “Ron Kaiser,” the address of 6602 SVL BOX, Victorville, CA (the mailing address for the Ronald and Vanessa KAISER), with “Tramadol 100mg (Radoll)” in the “Product” column of the spreadsheet. Agents know “Tramadol 100mg” is in reference to 100 milligram Tramadol tablets (a schedule IV-controlled substance). 100mg Tramadol pills have been recovered from other DTO members in this case. As a result, and as further explained below, agents believe that Ronald KAISER was previously a customer of the DTO, and became a re-shipper, payment receiver, and money launderer for the DTO.

14. Agents believe two of the drug ledger spreadsheets found within the Google account contained information about payments being made to the KAISERS by customers, and shipments being sent by the KAISERS on behalf of the DTO. The spreadsheets were both named “KAISER PP.” These spreadsheets were separate from the spreadsheet listing an order agents believe Ronald KAISER made as a customer.

15. The first of the two drug ledger spreadsheets had two tabs: “Vanessa” and “Ron.” The “Vanessa” tab contained columns that were labeled with titles, including “Date,” “Customer Name,” “Amount in,” “Payment Method,” etc. The “Customer Name” column contained several names known to agents to be DTO customers who had previously been sent controlled substances by DTO re-shippers. The “Payment Method” column listed mobile payment services, including

PayPal, Zelle, and Venmo, which are known methods that the DTO used to accept payment from customers for the purchases of controlled substances.

16. The most recent entry in the “Vanessa” tab in the first spreadsheet from the Google account showed a date of “13-Dec-22.” In total, there were fifty-seven entries showing payments that were suspected to have been paid to Vanessa KAISER between November 2022 and December 2022.

17. The “Ron” tab in the first spreadsheet also contained columns that were labeled with titles, including “Date,” “Customer Name,” “Amount in,” “Payment Method,” etc. Again, the “Customer Name” column contained several names known by agents to be DTO customers who had previously been sent controlled substances by DTO re-shippers that agents interviewed. The “Payment Method” column listed the mobile payments application “PayPal,” which is a known method that the DTO uses to accept payment from customers. The most recent entry in the “Ron” tab in the first spreadsheet showed a date of “11-Nov-22.” In total, there were three entries showing payments that are suspected to have been paid to Ronald KAISER in November 2022.

18. The second of the two drug ledger spreadsheets appeared to be a newer version of the same spreadsheet, but the spreadsheet had three tabs: “Vanessa,” “Inventory,” and “Orders.” The “Ron” tab that was in the first of the two spreadsheets is not in the second spreadsheet. The “Vanessa” tab in the second spreadsheet contained the same columns as the first spreadsheet. The “Customer Name” column again contained several names known to agents to be DTO customers, who have previously been sent controlled substances by DTO re-shippers. The “Payment Method” column listed mobile payment services, including PayPal, Zelle, and Venmo, which are known methods the DTO uses to accept payment from customers for the orders of controlled substances. The “Payment Method” column also listed “Cash in Mail” in several entries.

19. The most recent entry in the “Vanessa” tab in the second spreadsheet showed a date of “9-Feb-23.” In total, there were one hundred and ninety-one entries showing payments that were purportedly paid to Vanessa KAISER between November 2022 and February 2023. The “Inventory” tab in the second spreadsheet contained columns labeled “Date received,” “Tracking #,” “Product,” “Quantity In,” “Quantity Out, and “Balance.” The “Product” tab listed names such as “Adderall – 30,” Orange Pill,” “Belbien 10mg,” and “Alprazolam/Rlam-1 1mg.” During the investigation into the DTO, agents have seen similarly name substances being distributed.

20. The “Orders” tab in the second spreadsheet contained columns labeled “Date,” “Name,” “Address,” “Product,” “Count,” “Tracking #.” Some of the names listed in the “Name” column are names of people known to agents to be DTO customers. The “Product” column listed substances such as “Adderall -30 Orange Pill,” “Belbien 10mg,” “Ativan/Lorazepam 2mg (Pfizer).” The names of substances are in reference to controlled substances like the ones recovered earlier during the investigation of the DTO. Agents also used law enforcement databases and determined that the tracking numbers listed in the spreadsheet were sent through the United States mail and delivered. The tracking numbers showed that the originating area where the parcels were placed into the mail system was mainly Victorville, California near where the Kaisers live.

21. I submit that the spreadsheets show the KAISERS were both shippers and money launderers for the DTO, after Ronald KAISER was a customer.

22. Investigators in the Southern District of Florida reviewed the results of a search warrant on the Google Drive account of M1. Within the files analyzed, investigators observed a Google Sheet named “Kaiser PP,” created on November 7, 2022. A meta-data analysis of this file determined that they were accessible to multiple email addresses including

“imakaisernow@gmail.com” with the provided name of Vanessa Kaiser. The role identified for imakaisernow@gmail.com in the file is “writer.”

23. Within the “Kaiser PP” Google Sheet file, investigators observed a log of hundreds of entries including columns for customer shipment information titled: Product, Count, Carrier, and Tracking Number. The customer entries included shipments across the entire United States with six addresses in the Southern District of Florida receiving multiple shipments in Miami, Palm Beach Gardens, Fort Lauderdale, Davie, Deerfield, and Lake Worth. The “Product” sent to these addresses is marked as follows: Pregabalin/Nervigesic 300mg + Zopiclone 7.5mg; Zolpidem/Zoltrate 10mg; Tapentadol/Aspadol 100mg; S90-3 Long Green Pill (Known through training and experience to be Xanax); Ksalol 1mg + S90-3 Long Green Pill (Known through training and experience to be Xanax); Belbien 10mg; Ativan/Lorazepam 2mg (Pfizer). All of the above drugs are federally scheduled at various levels (II-V) under the Controlled Substances Act.

Email Communications in Google Account

24. DTO Google account data obtained through a search warrant further revealed the use of e-mail communications between a member of the DTO and Vanessa Kaiser. Agents located communications sent to an email address “iamakaisernow@gmail.com,” which included the name of “Vanessa Kaiser.” Agents located messages containing directions about orders sent from a member of the DTO to Vanessa KAISER. Agents also located several shipping labels. For example, in an email dated January 25, 2023, the DTO member stated, “One Order Only, Sukey Ridgway, Belbein 10mg, 200 Pills.” A shipping label was attached to the e-mail, which was a prepaid USPS shipping label. The label contained the name of “SUKEY RIDGWAY” with an address in La Jolla, California. I submit that this e-mail supports the assertion that Vanessa KAISER was acting as a re-shipper for the DTO.

Palm Beach County Controlled Delivery

25. During May 2023, an FDA-OCI Cooperating Defendant (“CD1”), under the supervision of law enforcement, communicated with a member of the DTO to receive one parcel containing personal use amounts of controlled substances.¹ On May 18, 2023, CD1 received the controlled substances that CD1 ordered, and CD1 received additional parcels containing controlled substances (distribution quantities) from the DTO that CD1 did not order or request. CD1 received a total of eight parcels. CD1 also told the DTO member that CD1 did not want the additional controlled substances, and the DTO leader directed CD1 to send the pills to a person residing in Palm Beach County, Florida (in the Southern District of Florida).

26. In preparation for a controlled delivery in Palm Beach County, FDA-OCI sent the pills to DEA agents in the Southern District of Florida through UPS, and DEA received the pills on May 22, 2023. DEA Southeast Laboratories tested the pills from CD1 and found the following: 87.5 grams (270 pills) of Tramadol in pharmaceutical packaging, 120 grams (180 pills) of Tapentadol in pharmaceutical packaging, and 65.5 grams (276 pills) of Tramadol that were pressed into pink pills with no pharmaceutical packaging. All of the pills are controlled substances.

27. On June 6, 2023, agents conducted a controlled delivery of the pills at the person’s address in Palm Beach County in the Southern District of Florida. As a result of his contact with law enforcement, the person at the address wished to cooperate with law enforcement and spoke to agents after agents read the person *Miranda* warnings. Hereinafter, the person at the address in Palm Beach County in the Southern District of Florida is referred to as Cooperating Defendant 2 (“CD2”). CD2 cooperated with law enforcement with the expectation of receiving leniency. CD2

¹ CD1 is currently a target of the investigation and expects leniency in return for his cooperation.

has prior arrests and possible convictions for drug trafficking, drug possession and possession of paraphernalia.

28. CD2 told agents that he previously used WhatsApp to communicate with a member of the DTO (hereinafter M1) regarding a shipment of Viagra pills that CD2 had ordered. During the conversation, M1 requested that CD2 ship a parcel containing 90 Tramadol pills to an individual in Fort Pierce, Florida. In exchange for doing so, M1 offered CD2 a discount on his order of Viagra pills. CD2 admitted to receiving the pills from M1 and sending the Tramadol on behalf of M1 through USPS to a person located in Fort Pierce, Florida, a few days before agents conducted the controlled delivery at CD2's residence. CD2 also said that M1 had recently asked him to become a re-shipper. Under the proposed arrangement, M1 said that he would pay CD2 \$20 for each parcel of pharmaceuticals that CD2 shipped. CD2 verbally and in writing consented to a search of his cellphone by agents. After reviewing the WhatsApp communications on CD2's phone, agents determined that CD2 had been truthful in his statements to agents.

29. On June 7, 2023, agents met with CD2 again. At the direction of agents, CD2 contacted M1 through WhatsApp and informed M1 that he did not want the bulk drug parcel that was delivered to his residence and did not want to distribute parcels. M1 then provided CD2 with a shipping label for the parcel. The address on the label made by M1 and sent to CD2 was 6602 SVL BOX, Victorville, California 92395 (the address for the KAISERS remote mailbox which is associated with their address at 17875 Lakeview Drive, Victorville, California).

30. On June 22, 2023, agents conducted surveillance at 17875 Lakeview Drive, Victorville, California, and determined that the residence was occupied by the KAISERS. On June 28, 2023, Federal Magistrate Sheri Pym signed a residential search warrant (Warrant 5:23-MJ-00311) for 17875 Lakeview Drive, Victorville, California, in the Central District of California.

31. On June 29, 2023, law enforcement agencies to include the DEA, FBI, HSI, and San Bernardino County Sheriff's Office conducted a search at 17875 Lakeview Drive, Victorville, California. After announcing their presence and waiting for the KAISERS to exit the residence, agents proceeded to execute the search warrant. Vanessa KAISER exited the residence and agents later found Ronald KAISER in the residence after he refused to exit. Both Ronald and Vanessa KAISER declined to speak with the agents and instead requested legal representation.

32. After securing the KAISER's residence, agents discovered the following:²

Northwest bedroom closet

- Exhibit 224 - Tapentadol tablet, 100 mg., approx. 10000 pills.
- Exhibit 225 - Tapentadol tablet, 100 MG, approx. 5500 pills.
- Exhibit 226 - Zolpidem Tablets, approx. 8,600 pills.
- Exhibit 230 - Gabapentin Tablets, 800 MG, approx. 2,020 pills.
- Exhibit 231 - Pregabalin capsules, approx. 1,650 pills.
- Exhibit 232 - Alprazolam tablets, in blister packs. approx. 13,125 pills.
- Exhibit 239 - Carisoprodol tablets, approx. 4,690 pills.
- Exhibit 240 - Modafinil pills, inside blister packs, approximately 4,700 pills.
- Exhibit 241 - Zopiclone blister packs, approx. 600 pills.
- Exhibit 242 - Belbien (Zolpidem) blister packs which contain 51,000 pills.

Kitchen

- Exhibit 246 - Alprazolam in blister packs; 90 pills in a parcel addressed to a person in New Jersey.

² The following are controlled substances: Tapentadol (Schedule II), Zolpidem (Schedule IV), Pregabalin (Schedule V), Alprazolam (Schedule IV), Carisoprodol (Schedule IV), Modafinil (Schedule IV), Zolpidem (Schedule IV), Zaleplon (Schedule IV), Zopiclone (Schedule IV),

- Exhibit 247 - Tapentadol in blister packs; 200 pills in a parcel addressed to a person in Washington state.
- Exhibit 248 - Belbien (Zolpidem) in blister packs; 500 pills in a parcel addressed to a person in Colorado.
- Exhibit 249 - Zolpidem in blister packs; 90 pills in a parcel addressed to a person in New Jersey.
- Exhibit 250 - Orange pressed pills; 80 pills in a parcel addressed to a person in Texas (filed tested positive for methamphetamine).
- Exhibit 251- Orange pressed pills; 30 pills in a parcel addressed to a person in New York (field tested positive for methamphetamine).
- Exhibit 252 - Belbien (Zolpidem) in blister packs; 30 pills in a parcel addressed to a person in Missouri.
- Exhibit 253 - Orange pressed pills; 100 pills in a parcel addressed to a person in New York (filed tested positive for methamphetamine).
- Exhibit 254 - Orange pressed pills; 40 pills in a parcel addressed to a person in Gulf Breeze, Florida (filed tested positive for methamphetamine).

Northeast bedroom (Office)

- Exhibit 227 - Orange pressed pills imprinted "AD 30."
- Exhibit 228 - Zaleplon capsules in blister packs containing 140 pills.
- Exhibit 234 - Alprazolam blister pack containing 70 pills.
- Exhibit 235 - Zolpidem in blister packs 110 pills.
- Exhibit 236 - Tapentadol capsules in blister packs, 375 pills.
- Exhibit 237 - Pink pills (unidentified) 32 pills.

- Exhibit 238 - Zaleplon blister packs which contain 600 pills.
- Exhibit 243 - Modafinil tablets in blister packs; 30 pills.
- Exhibit 244 - Zopiclone pills in blister packs; 120 pills.
- Exhibit 245 - Green rectangular pills, imprinted S903, approx. 4,000 pills.
- Exhibit 255 - Blister pack containing 10 red/white capsules marked "Signature."
- Exhibit 256 - Two clear bags containing various shaped and colored pills.
- Exhibit 257 - Cenforce -100 (Sildenafil Citrate) blister packs which contain 500 football shaped blue pills marked "100."
- Exhibit 258 - Pain-O-Soma (Carisoprodol) blister packs containing 40 unmarked pills.
- Exhibit 259 - Zoltrate (Zolpidem) blister packs containing approximately 385 white oval shaped tablets.
- Exhibit N-224 Black laptop.
- Exhibit N-230 - Receipts and Miscellaneous documents found on top of desk in office.
- Exhibit N-231 - Eight small notebooks located in desk drawer in the office.
- Exhibit N-233 - Small Notebook with website passwords.
- Exhibit N-235 - Trezor hardware wallet belonging to Ronald KAISER

Southwest Bedroom (Master bedroom)

- Exhibit 229 - 10 boxes containing glass vials with white substance; 100 vials.
- Exhibit 233 - Seven (7) ZYHCG bottles.
- Exhibit 260 - Multiple vials containing steroid substances.
- Exhibit N-222 - Gold colored Samsung Galaxy S7 phone.

- Exhibit N-223 - Pink colored Samsung Galaxy S9 phone.
- Exhibit N-225 - Black tablet.
- Exhibit N-234 - HSI Evidence bags.

33. After the search of the Target Residence was concluded, DEA TFO Barry Kopplin informed Vanessa KAISER that the search had been completed. At that moment, Vanessa KAISER spontaneously made a statement, claiming full responsibility for everything discovered during the search and asserting that Ronald KAISER had no knowledge of the contraband found. Additionally, Vanessa KAISER expressed her concern about her cell phone, specifically mentioning her cell phone with the pink case, and stated that she needed it to put a stop to the illegal activities. TFO Kopplin, in response, informed Vanessa KAISER that her cell phone would remain in the custody of the agents as it was considered part of an ongoing investigation.

LAB TESTING

34. On August 21, 2023, Agents received the lab results from the Palm Beach County Sheriff's Office Forensic Sciences Division. Agents had selected some exhibits to be tested by the laboratory and others that would not be tested due to evidence reduction initiative in the laboratories. The lab tested multiple exhibits recovered from inside the residence of 17875 Lakeview Drive, Victorville, CA, which was occupied by Vanessa KAISER and Ronald KAISER. Agents selected the pills which were pressed and appeared to be fake pharmaceutical pills to be tested. Pills which were in blister packs were not tested by the laboratory. In addition to the other substances, the KAISERS were found to be in possession of a total of 474.4834 grams of methamphetamine and 95.7518 grams of Acetaminophen.

PHONE REVIEW

35. As part of the residential search warrant obtained in the Central District of California, agents were authorized to seize and extract electronic evidence from electronic devices located on the premises of 17875 Lakeview Drive, Victorville, California. As a result, agents extracted the data from a Samsung Galaxy S9 cellphone (number ending 4184) which was owned and used by Ronald KAISER. Agents went through the text messages and observed multiple text messages ranging from July 2022 until June 2023. In the text messages on Ronald KAISER's phone, agents found messages with individuals claiming to be from pharmacies selling KAISER controlled substances without a prescription. Agents observed additional text messages where KAISER was buying and selling prescription pills and other drugs to individuals in his phone locally not using the U.S. Mail system. Agents know Ronald KAISER was using this phone because in text messages he identified himself as "Ronald Kaiser." Agents observed photos in the cellular phone of Ronald KAISER which depicted envelopes and parcels addressed other known conspirators of the DTO along with photos of pills.

36. Agents extracted data from a Samsung Galaxy S7 cellphone (number ending 9559) which was owned and used by Vanessa KAISER. Agents went through the text messages and observed multiple text messages ranging from January 2023 until June 2023. In the text messages on Vanessa KAISER's phone, agents found messages with people identifying themselves as Vanessa KAISER's daughter and a known member of the DTO. Text messages with her daughter showed conversations coordinating money transfers to the known member of the DTO. The text messages with the DTO member show coordination of drug shipments being received and sent through the mail at the direction of the DTO member. Agents know Vanessa KAISER is using this

phone due to the fact in text messages she is referred to as “Van” and she claimed ownership of the cellular phone when the phone was seized during the search warrant.

37. Upon further examination of Vanessa KAISER’s cell phone shortly after the execution of the warrant, agents discovered a Google application containing several Excel sheets documenting names, addresses, types, and quantities of pills ordered.³ This practice is typical for the DTO, as shippers commonly receive Google Excel sheets via email, as explained above. Within the Google Excel sheets used to carry out the distribution activities of the DTO, agents located an individual A.J. residing in Davie, Florida, in the Southern District of Florida. During a related investigation, a shipper for the same DTO, H.F., also had similar Excel sheets stored in his cell phone indicating his involvement with the same clientele of the DTO. On August 10, 2023, agents from the DEA apprehended H.F., for his involvement in the shipment of counterfeit pills from the Hialeah, Florida area.

38. During the investigation of H.F., agents discovered that the website utilized Venmo and/or bank accounts associated with the Hialeah shipper H.F. to receive and/or transfer deposits from customers ordering pills. Upon closer examination, agents observed recurring payments from an individual identified as A.J., made for pills ordered through the website. Subsequent research across various law enforcement databases led agents to identify an A.J. residing in the Davie, Florida, area in the Southern District of Florida.


CONCLUSION

Based on the foregoing, your affiant respectfully submits that there is probable cause to charge Ronald KAISER and Vanessa Vanly KAISER with conspiracy to possess with intent to

³ The spreadsheet was initially visible by looking on the cell phone and was reviewed by multiple agents. Later, the spreadsheet was unrecoverable. Agents are aware that Google data may be automatically deleted based on settings selected by the user.

distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 846 and 841(b)(1)(B)(viii).

FURTHER YOUR AFFIANT SAITH NAUGHT.



TYLER WITT
DEA Task Force Officer

Sworn to and attested to me by Affiant on
this ___ day of April 2024, by Telephone
(Facetime) per Fed. R. Crim. P.4(d) and 4.1.



Digitally signed by
Bruce Reinhart
Date: 2024.04.04
10:40:51 -04'00'

HON. BRUCE E. REINHART
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: VANESSA VANLY KAISER

Case No: 24-8160-BER

Count 1:

Conspiracy with intent to distribute a controlled substance (50 grams or more of a mixture or substance containing a detectable amount of methamphetamine)

21 U.S.C. § 841(a)(1), 846 and 841(b)(1)(B)(viii)

- * **Max. Term of Imprisonment:** 40 years
- * **Mandatory Min. Term of Imprisonment:** 5 years
- * **Max. Supervised Release:** Life
- * **Max. Fine:** \$5,000,000
- * **Special Assessment:** \$100.00

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: RONALD ROBERT KAISER

Case No: 24-8160-BER

Count 1:

Conspiracy with intent to distribute a controlled substance (50 grams or more of a mixture or substance containing a detectable amount of methamphetamine)

21 U.S.C. § 841(a)(1), 846 and 841(b)(1)(B)(viii)

- * **Max. Term of Imprisonment:** 40 years
- * **Mandatory Min. Term of Imprisonment:** 5 years
- * **Max. Supervised Release:** Life
- * **Max. Fine:** \$5,000,000
- * **Special Assessment:** \$100.00

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**