

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

**FILED**  
OCT 24 2019  
CLERK US DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
DEPUTY

**ARREST ON OUT-OF-DISTRICT OFFENSE**

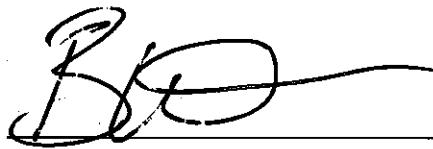
CASE NUMBER **19MJ4697**

The person charged as Joanna DEALBA now appears before this United States District Court for an initial appearance as a result of the matter having been filed in the United States District Court for the Eastern District of New York with: possession with intent to distribute methamphetamine and heroin; Title 21 USC Section(s) 841.

The charging documents and warrant for the arrest of the defendant which was issued by the above United States District Court are attached hereto.

I hereby swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED: 10/24/2019

 (signature)

Ben Walker (print)  
Deputy United States Marshal

Reviewed and Approved

DATE: 10/24/2019

 (signature)

Jessica G. Moreno (print)  
Assistant United States Attorney

AO 442 (Rev. 11/11) Arrest Warrant

# UNITED STATES DISTRICT COURT

for the  
Eastern District of New York

United States of America  
v.

JOANNA DEALBA  
also known as "Rapturereloaded"

Defendant

)  
)  
)  
)  
)  
)

Case No. 19-MJ-659

19MJ4697

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
(name of person to be arrested) JOANNA DEALBA (DOB: December 4, 1980)  
who is accused of an offense or violation based on the following document filed with the court:

- Indictment       Superseding Indictment       Information       Superseding Information       Complaint
- Probation Violation Petition       Supervised Release Violation Petition       Violation Notice       Order of the Court

This offense is briefly described as follows:

Possession with intent to distribute methamphetamine and heroin.



Date: 07/19/2019

Issuing officer's signature

City and state: Brooklyn, New York

Hon. Steven M. Gold, U.S.M.J.

Printed name and title

### Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_

Date: \_\_\_\_\_  
Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.**

*(Not for Public Disclosure)*

Name of defendant/offender: \_\_\_\_\_

Known aliases: \_\_\_\_\_

Last known residence: \_\_\_\_\_

Prior addresses to which defendant/offender may still have ties: \_\_\_\_\_

Last known employment: \_\_\_\_\_

Last known telephone numbers: \_\_\_\_\_

Place of birth: \_\_\_\_\_

Date of birth: \_\_\_\_\_

Social Security number: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_

Sex: \_\_\_\_\_ Race: \_\_\_\_\_

Hair: \_\_\_\_\_ Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks: \_\_\_\_\_

History of violence, weapons, drug use: \_\_\_\_\_

Known family, friends, and other associates *(name, relation, address, phone number)*: \_\_\_\_\_

FBI number: \_\_\_\_\_

Complete description of auto: \_\_\_\_\_

Investigative agency and address: \_\_\_\_\_

Name and telephone numbers (office and cell) of pretrial services or probation officer *(if applicable)*: \_\_\_\_\_

Date of last contact with pretrial services or probation officer *(if applicable)*: \_\_\_\_\_

SD:FJN  
F#. 2018R01812

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
-----X

UNITED STATES OF AMERICA

19-MJ-659

- against -

COMPLAINT

JOANNA DEALBA,  
also known as "Rapturereloaded,"

(21 U.S.C. §§ 841(a) and  
841(b)(1)(A)(ii)(I))

Defendant.

-----X

EASTERN DISTRICT OF NEW YORK, SS:

PATRICK O’KAIN, being duly sworn, deposes and states that he is a Special Agent with the Drug Enforcement Administration, duly appointed according to law and acting as such.

On or about January 3, 2019, within the Eastern District of New York and elsewhere, the defendant JOANNA DEALBA did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

(Title 21, United States Code, Section 841(a) and 841(b)(1)(B)(viii))

On or about between October 3, 2018 and January 3, 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOANNA DEALBA, did knowingly and intentionally distribute and possess with

intent to distribute a controlled substance, which involved a detectable amount of a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Section 841(a) and 841(b)(1)(C))

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the Drug Enforcement Administration ("DEA"). I have been a DEA Special Agent for approximately 6 years and am currently assigned to the New York Division. During my tenure with the DEA, I have participated in numerous investigations of drug trafficking organizations during which I have conducted physical and electronic surveillance, executed court-authorized search warrants, debriefed cooperating witnesses and victims, reviewed and analyzed numerous taped conversations of those engaged in illegal activity, monitored wiretapped conversations and reviewed line sheets prepared by wiretap monitors. Through my training, education and experience, I have become familiar with the manner in which drug trafficking schemes are carried out and the efforts of persons involved in each activity to avoid detection by law enforcement.

2. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned

---

<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated

### **Background Regarding Digital Currency and the Dark Web**

3. Digital currency (also known as crypto-currency) is generally defined as an electronic-sourced unit of value that can be used as a substitute for fiat currency (i.e. currency created and regulated by a government). Digital currency exists entirely on the internet and is not stored in any physical form. Digital currency is not issued by any government, bank, or company and is instead generated and controlled through computer software operating on a decentralized peer-to-peer network. Digital currency is not illegal in the United States and may be used for legitimate financial transactions. However, digital currency is often used for conducting illegal transactions, such as the sale of controlled substances.

4. Bitcoin is a type of digital currency. Bitcoin payments are recorded in a public ledger called a blockchain that is maintained by peer-to-peer verification and is thus not maintained by a single administrator or entity. Individuals can acquire Bitcoins either by “mining” or by purchasing Bitcoins from other individuals. An individual can “mine” for Bitcoins by allowing his/her computing power to verify and record the Bitcoin payments on the blockchain. Individuals are rewarded for this by being given newly created Bitcoins.

5. An individual can send and receive Bitcoins through peer-to-peer digital transactions or by using a third-party broker. Such transactions can be done on any type of computer, including laptop computers, tablets, and cellular telephones.

6. Bitcoins can be stored in “wallets”. A digital wallet essentially stores

the access code that allows an individual to conduct Bitcoin transactions on the public ledger. To access Bitcoins 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 an account number while the private key is like the password to access that account.

7. Even though the public addresses of those engaging in Bitcoin transactions are recorded on the blockchain, the true identities of the individuals or entities behind the public addresses are not recorded. If, however, a real individual or entity is linked to a public address, it would be possible to determine what transactions were conducted by that individual or entity.

8. Through the dark web or darknet – websites accessible only through encrypted means – individuals have established online marketplaces, such as Silk Road, AlphaBay, DreamMarket, Wall Street Market, Point/Tochka, and Berlusconi, for narcotics and other illegal items. These markets often only accept payment through digital currencies, such as Bitcoin. Accordingly, individuals intending to purchase illegal items on the dark web need to obtain Bitcoins. Conversely, individuals who have received Bitcoin as proceeds of illegal sales on the dark web need to sell their Bitcoin or convert them to fiat currency in order to spend the proceeds outside of the dark web. Such sales or exchanges of Bitcoin are often facilitated by peer-to-peer Bitcoin exchangers who advertise their services on website designed to facilitate such transactions.

9. Dark web sites such as Silk Road, AlphaBay, DreamMarket, Wall Street Market, Point/Tochka, and Berlusconi operate(d) on “The Onion Router” or “TOR” network. The TOR network is a special network of computers on the internet that is 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 likewise 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" have complex web addresses, which are many times generated by a computer algorithm, ending in ".onion" and can only be access through specific web browser software designed to access the TOR network.

**The DEA Identifies "RAPTURERELOADED" as a Dark Web Narcotics Distributor**

10. In 2018 the DEA began investigating narcotics traffickers operating on the dark web. The DEA identified narcotics vendors and contacted those vendors using various methods. The investigation monitored an advertisement website, Wall Street Market and identified a vendor named "RAPTURERELOADED." According to information obtained from RAPTURERELOADED's profile on Wall Street Market, RAPTURERELOADED has been a United States-based seller of heroin and methamphetamine since June 2018.

11. RAPTURERELOADED's advertisement stated:

"Reporting from Baja, CA, AZ, and NY! Have you ever paid attention to where your product is coming from other than the purpose of shipping time? Allow us to put things into perspective for a sec. Colombian cocaine, California's chronic, and Cuba's cigars wouldn't be notorious if not for their quality. We stand behind our products so much that we decided to centralize near the sources last year."

12. RAPTURERELOADED's listings page also claimed that it tracked all orders and offered a variety of "stealth" delivery options, including options designed to thwart "controlled deliveries." For example:



“We also track every order for yours (and ours) piece [sic] of mind! For those of you that use informed delivery, this service that we pay for uses the same system to scan your package. This barcode provides us with tracking information as your packages are scanned at each postal facility. We check on your orders every day and if we catch something ahead of time we will contact you. What does this mean for you? Free 1st class shipping with real tracking free of charge!!!”

13. During the course of the investigation, the DEA conducted several reviews of RAPTURERELOADED’s activity on the Wall Street Market, with the most recent review conducted on January 8, 2019. The DEA also learned that Wall Street Market maintains a “Vendor Level,” which reflects the vendor’s successful transactions, positive reviews, and the recruitment of new users. Vendor Levels, in turn, are based on the amount of experience points accrued.

14. Based on the analysis conducted, as of on or about October 3, 2018, RAPTURERELOADED had completed 167 transactions on Wall Street Market and held a Vendor Level of 9 with 113,000 experience points. As of on or about January 8, 2019, RAPTURERELOADED had completed 380 transactions on Wall Street Market and held a Vendor Level of 11 with 346,000 experience points. This means that in the approximately 3-month period between October and January 2018, RAPTURERELOADED completed approximately 213 orders, raised his/her Vendor Level by 2, and gained approximately 179,000 experience points.

**Undercover Narcotics Purchase on October 3, 2018**

15. On or about October 3, 2018, a DEA Special Agent acting in an undercover capacity (“UC”), went to RAPTURERELOADED’s listings on Wall Street Market and purchased 10 grams of heroin for a total of \$510 (\$500 for the heroin and \$10 for

shipping). Per RAPTURERELOADED's instructions on his/her listings, the UC provided a shipment address in Queens, New York for the heroin. Upon entering the order for 7 grams of heroin, the UC was given an identification number for the transaction and a trade address where Bitcoin should be sent as payment. The UC was also told a price in Bitcoin based on the exchange rate at the time of the purchase. The UC then sent the Bitcoin to RAPTURERELOADED via the escrow function on Wall Street Market, as requested.

16. On or about October 4, 2018, RAPTURERELOADED marked the heroin as shipped. On or about October 11, 2018, the UC sent a message to RAPTURERELOADED via Wall Street Market stating, "Hey Rapture I have not received anything yet. Was it sent out? Do you have a tracking #?" On or about October 12, 2018, RAPTURERELOADED responded, stating "Your order is out for delivery 10/12/18. If you wish to reorder with us please allow up to 10 business days for delivery. Thank you. - RR". RAPTURERELOADED also sent the UC a tracking number for the package from a third-party private parcel tracking service (hereinafter referred to as "Company A").

17. On or about October 18, 2018, the UC retrieved the package that RAPTURERELOADED sent to the UC's mailbox in Queens, New York. The package had a return address of "R&R Inc., 1201 Vine Street, Los Angeles, CA 90036". The package also bore a postmark from San Diego, California dated October 9, 2018. A search of the package revealed a bag that contained approximately 10 grams of a substance that tested positive for heroin.

#### **Undercover Narcotics Purchases on January 3, 2019**

18. On or about January 3, 2019, the UC went to RAPTURERELOADED's listings on Wall Street Market and purchased 30 grams of heroin

for a total of \$1,810 (\$1,800 for the heroin and \$10 for shipping). Per RAPTURERELOADED's instructions on his/her listings, the UC provided a shipment address in Queens, New York for the heroin. Upon entering the order for 30 grams of heroin, the UC was given an identification number for the transaction and a trade address where Bitcoin should be sent as payment. The UC was also told a price in Bitcoin based on the exchange rate at the time of the purchase. The UC then sent Bitcoin to RAPTURERELOADED via the escrow function on Wall Street Market, as requested.

19. Later in the day on or about January 3, 2019, the UC went to RAPTURERELOADED's listings on Wall Street Market and purchased 10 grams of methamphetamine for a total of \$160 (\$150 for the methamphetamine and \$10 for shipping). Per RAPTURERELOADED's instructions on his/her listings, the UC provided a shipment address in Queens, New York for the heroin. Upon entering the order for 10 grams of methamphetamine, the UC was given an identification number for the transaction and a trade address where Bitcoin should be sent as payment. The UC was also told a price in Bitcoin based on the exchange rate at the time of the purchase. The UC then sent Bitcoin to RAPTURERELOADED via the escrow function on Wall Street Market, as requested.

20. On or about January 14, 2019, the UC retrieved the package that RAPTURERELOADED sent to the UC's mailbox in Queens, New York. The package had a return address of "Wallsteeen Market Inc." at 1600 North Arizona Avenue, San Hacienda Chandler, AZ 85225. The package also bore a postmark with a tracking number. According to the tracking number transit history, the parcel originated at a United States Postal Service facility in San Diego, California on or about January 9, 2019. A search of the package revealed a small plastic container that contained approximately 30 grams of a

substance that tested positive for heroin. The package also contained a clear plastic bag that contained approximately 10 grams of a substance that tested positive for methamphetamine.

**Undercover Narcotics Purchases on January 22, 2019**

21. On or about January 22, 2019, the UC went to RAPTURERELOADED's listings on Wall Street Market and purchased 20 grams of heroin for a total of \$310 (\$300 for the heroin and \$10 for shipping). Per RAPTURERELOADED's instructions on his/her listings, the UC provided a shipment address in Queens, New York for the heroin. Upon entering the order for 20 grams of heroin, the UC was given an identification number for the transaction and a trade address where Bitcoin should be sent as payment. The UC was also told a price in Bitcoin based on the exchange rate at the time of the purchase. The UC then sent Bitcoin to RAPTURERELOADED via the escrow function on Wall Street Market, as requested.

22. As of the date of this application, the heroin has not yet been received by the UC.<sup>2</sup>

**The DEA Identifies RAPTURERELOADED as JOANNA DEALBA**

23. As explained above, RAPTURERELOADED provided the UC with a

---

<sup>2</sup> As described in detail below, the person who the DEA believes to be RAPTURERELOADED, was detained at the San Ysidro Port of Entry on or about January 31, 2019 and questioned about several parcels containing drugs that were addressed to her husband and intercepted by law enforcement. I believe that this border stop temporarily disrupted RAPTURERELOADED's drug trafficking operation and was the reason the DEA agents never received the 20 grams of heroin. On or about February 6, 2018, DEA agents, acting in an undercover capacity sent an email to RAPTURERELOADED at raptureroom@protonmail.com and inquired about the shipment. RAPTURERELOADED responded that the organization ran into technical difficulties, provided a new email address, and informed the agents that they were discontinuing use of the raptureroom@protonmail.com account.

tracking number from Company A for the heroin that the UC purchased on or about October 3, 2018. According to Company A's website, Company A is a paid service that allows users to track items shipped via regular first-class United States mail. Company A sells United States Postal Service-intelligent barcodes that a shipper can add to a piece of regular first-class U.S. mail that allows the mail piece to be tracked as it travels through the postal system to its destination.

24. DEA obtained records from Company A's tracking system, and learned that the package containing the heroin that was purchased on October 3, 2018, was shipped by Company A User ID 1732 (the "1732 Account"), which is registered to R&R, Inc., 114 C Avenue, Coronado, California 92118 (the "Coronado Address"). According to open source and public record research, this address appears to be an apartment building with several retail storefronts. The phone number associated with R&R was 619-934-9016 (the "9016 Number"). The sender of the package purchased 250 shipment tracking barcodes from Company A on or about July 27, 2018 using a credit card in the name of DEALBA. Subpoena results for the 9016 Number indicate that the subscriber is "Revolve Laundry" with a billing address of 2675 Customhouse Court, Suite K, San Diego, CA 92154.<sup>3</sup> However, a review of public record databases revealed that the 9016 Number associated with the package is associated with DEALBA at 1332 La Tempra Corte, Chula Vista, California. A review of California motor vehicle records revealed that DEALBA resides at 1332 La Tempra Corte, Chula Vista, California.

25. A further review of Company A records revealed four other accounts—

---

<sup>3</sup> Revolve Laundry appears to be a commercial laundry business. The connection between DEALBA and Revolve Laundry is under investigation.

in addition to the 1732 Account used for the October heroin shipment—that are associated with DEALBA:

User ID	Name	Company Name	Address	Phone Number	Email
1732	R&R, Inc.	WSM	Coronado Address	9016 Number	brandocommando619@yahoo.com
1719	R&R, Inc.		Coronado Address	619-576-2337	jojomojoso@my.com
1718	R&R, Inc.	R&R, Inc.	Coronado Address	9016 Number	lyfyourlyfe@my.com
1713	B. Unangst	R&R, Inc.	Coronado Address	619-344-9553	rapturereloaded@protonmail.com
1705	Brandon Unangst	Rapture	Coronado Address	619-576-2337	raptureroom@protonmail.com

26. According to Company A, all five of the accounts were created in or about July 2018, which is shortly after the RAPTURERELOADED account was created on Wall Street Market. As discussed above, the 1732 account that was used for the October heroin shipment was funded with a credit card in the name of DEALBA. The 1705 account was funded using a credit card bearing the same number, expiration date, and card verification value (“CVV”). However, the card was in the name of Brandon Unangst (“Unangst”).

27. A review of public records and open source social media accounts revealed that Unangst was married to DEALBA from in or about April 2017 until Unangst’s

reported death on or about March 6, 2018.<sup>4</sup>

28. Since Unangst's reported death, DEALBA had been utilizing his identity and credit cards – in addition to her own – to fund her narcotics business on Wall Street Market. For example, as explained above, DEALBA used her credit card and Unangst's credit card to create and fund the Company A accounts in July 2018 – approximately four months after Unangst's reported death. Moreover, each account bears a connection to DEALBA and/or Unangst:

- Account 1732 bears DEALBA's cellular telephone number and an email in the name of brandocommando619@yahoo.com, which based on my training and experience is likely an email associated with Brandon Unangst.
- Account 1719 bears an email in the name of jojomojoso@my.com. A review of DEALBA's Facebook page lists "jojomojosodope" as a nickname for DEALBA. A user named "jojo mojo le dope" maintains a YouTube account that contains a profile picture that is similar to the logo used by RAPTURERELOADED on Wall Street Market. Specifically, both accounts use a reversed capital R beside a normal capital R, visually similar to ЯR, inside a five-pointed star. The YouTube account contains a video titled, "Newlyweds getting goofy!" and shows an unidentified male and female. Agents have reviewed the images of the male in the video and compared them to Unangst's California driver license photo and believe they are the same person. I have also reviewed the images of the female in the video and compared them to DEALBA's California driver license photo and believe they are the same person.
- Account 1718 bears DEALBA's cellular telephone number, and an email in the name of lyftyourlyfe@my.com. A review of DEALBA's Facebook page revealed that DEALBA lists her occupation to be "independent contractor" for the ride-sharing company Lyft.
- Account 1713 bears Unangst's name and an email in the name of rapturereloaded@protonmail.com.
- Account 1705 bears Unangst's name and an email in the name of

---

<sup>4</sup> On or about March 16, 2018, DEALBA posted on Facebook that Unangst had "passed last Tuesday peacefully in our home." In the post, DEALBA also refers to herself as Unangst's "Y-fee," which based on my training and experience is slang for "wifey" or wife.

raptureroom@protonmail.com.

Narcotics Seizures

29. On or about August 12, 2018, United States Customs and Border Protection (“CBP”) intercepted a package from the Netherlands that was addressed to Unangst at the Coronado Address. The package contained approximately 30 grams of a brownish crystal-like powder that field tested positive for methamphetamine. Unangst had been reportedly dead for approximately five months at the time the package was intercepted.

30. On or about September 30, 2018, CBP intercepted a package from the Netherlands that was addressed to Unangst at 482 W San Ysidro Blvd, Apartment 1571, San Ysidro, California (the “San Ysidro Address”).<sup>5</sup> The package contained approximately 52 tablets that tested positive for methamphetamine. Unangst had been reportedly dead for approximately seven months at the time the package was intercepted.

31. On or about November 6, 2018, CBP intercepted a package from the Netherlands that was addressed to Unangst at the San Ysidro Address. The package contained approximately 207 pills that tested positive for methamphetamine. Unangst had been reportedly dead for approximately eight months at the time the package was intercepted.

32. On or about January 3, 2019, the Department of Homeland Security, Homeland Security Investigations (“HSI”) intercepted a package from Canada that was addressed to Unangst at the San Ysidro Address. The package contained approximately 4.2

---

<sup>5</sup> 482 W San Ysidro Blvd, Apartment 1571, San Ysidro, California is the address for a company that provides mailbox rental services. DEALBA admitted to law enforcement during the border stop described herein that she maintained P.O. Box 1571 at this location.

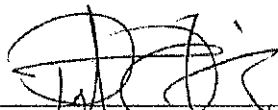


grams of a substance that tested positive for fentanyl. Unangst had been reportedly dead for approximately 10 months at the time the package was intercepted.

33. On or about January 14, 2019, CBP intercepted a package from the Netherlands that was addressed to Unangst at the San Ysidro Address. The package contained approximately 239.23 grams of a substance (in tablet form) that tested positive for methamphetamine. Unangst had been reportedly dead for approximately 10 months at the time the package was intercepted.

WHEREFORE, your deponent respectfully requests that the defendant JOANNA DEALBA be dealt with according to law.

I further request that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant. Based upon my training and experience, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving the target an opportunity to flee from prosecution, destroy or tamper with evidence and change patterns of behavior.

  
\_\_\_\_\_  
PATRICK O'KAIN  
Special Agent, Drug Enforcement Administration

Sworn to before me this  
19th day of July, 2019

  
\_\_\_\_\_  
THE HONORABLE STEVEN M. GOLD  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK