

UNITED STATES DISTRICT COURT

for the

Eastern District of California

FILED
Apr 07, 2022
CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SEALED

United States of America
v.

Holly Adams
Devlin Hosner

Case No.

2:22-mj-0052 CKD

Defendant(s)

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 dates of in or around May 2021 through in the county of Sacramento in the
in or around March 2022
Eastern District of California, the defendants violated:

Code Section Offense Description
21 U.S.C. §§ 846, 841 Conspiracy to distribute controlled substances

This criminal complaint is based on these facts:

See affidavit of IRS-CI Special Agent Christopher Fitzpatrick.

Continued on the attached sheet.

/s/ Complainant's signature

Christopher Fitzpatrick, IRS-CI Special Agent
Printed name and title

Sworn to and signed telephonically, pursuant to Federal Rule of Criminal Procedure 4.1.

Date: April 7, 2022

Carolyn K. Delaney
Judge's signature

City and state: Sacramento, California

Carolyn K. Delaney, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Christopher Scott Fitzpatrick, being duly sworn, hereby depose and state as follows:

**I. OVERVIEW OF APPLICATION AND INVESTIGATION**

1. I make this affidavit in support of a criminal complaint and arrest warrants for Devlin Hosner and Holly Adams. Based on the facts set forth in this affidavit, I submit that probable cause exists to believe that Hosner and Adams violated 21 U.S.C. §§ 846 and 841(a)(1) by conspiring to distribute and to possess with intent to distribute controlled substances.

2. Since at least in or around May 2021, law enforcement agents have been investigating Hosner and Adams for running an illegal narcotics distribution operation on various encrypted websites on the dark web. During this investigation, law enforcement officers conducted multiple undercover purchases of counterfeit oxycodone pills from Hosner and Adams. Near the end of the investigation, an online identity linked to Hosner and Adams told an undercover law enforcement agent that the pills sold to undercover agents contained fentanyl. And while law enforcement has not yet tested every pill purchased during this investigation, all the pills that law enforcement has tested to date contained fentanyl.

3. Based on the above facts and on the similarity of the pills that tested positive for fentanyl to the other pills purchased and seized by undercover law enforcement agents during this investigation, agents believe that all of the tens of thousands of pills currently in law enforcement's possession as a result of this investigation contain fentanyl.

4. During the investigation, agents also observed Adams place a parcel containing illegal narcotics into the mail using a facility maintained by the United States Postal Service ("USPS"). Additionally, agents traced monies used in undercover narcotics purchases to financial accounts controlled by Hosner, and agents also reviewed structured cash withdrawals made by Hosner that appear designed to evade financial reporting requirements imposed by federal law.

5. In March 2022, agents executed a search warrant at a hotel where Hosner and Adams were residing. Inside this hotel room, agents seized approximately 10,000 counterfeit

oxycodone pills suspected to contain fentanyl, as well as suspected methamphetamine, intravenous needles, and packaging materials.

6. This affidavit is intended to show only that there is sufficient probable cause for the requested criminal complaint and arrest warrants, and does not set forth all of my knowledge about this matter. The facts contained in this affidavit come from my personal knowledge as well as the personal knowledge of other law enforcement agents on the investigative team. Additionally, I have consulted with other law enforcement officers with many years of combined experience investigating conspiracies to distribute controlled substances.

## **II. AFFIANT BACKGROUND AND EXPERIENCE**

7. I am a Special Agent of the Department of Treasury, Internal Revenue Service – Criminal Investigation (“IRS-CI”), and have been since September 2001. I am currently assigned to the IRS-CI Sacramento Office and I am charged with investigating drug trafficking and money laundering activities in the Eastern District of California, and elsewhere. I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), and I am empowered by law to conduct investigations and make arrests for federal felony offenses. Additionally, I am a federal law enforcement officer within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure, that is, a federal law enforcement agent engaged in enforcing criminal laws and authorized to request a search warrant.

8. I was trained at the Federal Law Enforcement Training Center located in Glynco, Georgia. During my training, I received special training in money laundering, including but not limited to, 18 U.S.C. § 1957 and 31 U.S.C. § 5324(a)(1). I also received special training in specified unlawful activities under the money laundering statutes, including but not limited to, violations of 21 U.S.C. §§ 846 and 841(a)(1). I have also spoken to and worked with experienced federal, state, and municipal agents and narcotics officers regarding the methods and means employed by drug manufacturers and drug traffickers, including their use of express carriers and the USPS to distribute illegal narcotics.

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9. During the course of my employment as an IRS-CI Special Agent, I have participated in numerous criminal investigations. I have participated in executing numerous federal and state search warrants involving controlled substances, the seizure of narcotics-related records and other types of evidence that document the activities of criminal organizations in both the manufacturing and distribution of controlled substances, and laundering of criminally derived proceeds. To successfully conduct these investigations, I have utilized a variety of investigative techniques and resources, including physical and electronic surveillance, various types of infiltration, undercover agents, informants, and cooperating sources. Through these investigations, my training and experience, and conversations with other agents and law enforcement personnel, I am familiar with the methods used by drug traffickers to smuggle and safeguard controlled substances, to distribute, manufacture, and transport controlled substances, and to collect and launder related proceeds.

10. I am part of the Northern California Illicit Digital Economy (“NCIDE”) Task Force composed of IRS-CI, Homeland Security Investigations, the Federal Bureau of Investigation (“FBI”), the United States Postal Inspection Service (“USPIS”), the United States Postal Inspection Service-Office of the Inspector General (“USPIS-OIG”), and the Drug Enforcement Administration (“DEA”). As a function of this task force, investigators regularly purchase narcotics utilizing both digital and fiat currencies, from the persons operating and illegally selling narcotics on the “clear” portion of the internet, from the “dark” portion of the internet, and from various social media platforms. Investigators conduct these undercover purchases of narcotics to identify suspects operating such illicit sites.

### **III. BACKGROUND REGARDING DARK WEB VENDING AND NARCOTICS**

11. Pretty Good Privacy (“PGP”) is an encryption program that provides cryptographic privacy and authentication for data communication. PGP makes use of public-key encryption, in which one key is used to encrypt the data (the public key) and another key is used to decrypt it (the private key). This technology allows, for example, a dark-web drug vendor to

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communicate in an encrypted format by broadcasting the vendor's public key to customers who can then encrypt messages they want to send to the vendor.

12. Digital currency (also known as cryptocurrency) is generally defined as an electronically sourced unit of value that can be used as a substitute for fiat currency (fiat currency is created and regulated by a government).

13. 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, but 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.

14. Bitcoin is a type of digital currency. Bitcoin payments are recorded in a public ledger that is maintained by peer-to-peer verification and is thus not managed 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 Bitcoin payments into a public ledger. Individuals are rewarded for this by receiving newly created Bitcoins. An individual can send and receive Bitcoins through peer-to-peer digital transactions or by using a third-party broker. Such transactions can be performed on any type of computer, including laptops and smart phones.

15. Bitcoins can be stored in digital "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 key. The public key can be analogized to an account number, while the private key is like the password to access that account.

16. Even though the public addresses of those engaging in Bitcoin transactions are recorded on the public ledger, the true identities of those 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. Bitcoin transactions are, therefore, described as “pseudonymous,” meaning they are partially anonymous.

17. The dark web, or darknet, consists of websites accessible only through encrypted means. Using the dark web, individuals have established online marketplaces, such as Silk Road, for narcotics and other illegal items. These markets often only accept payment through digital currencies, such as Bitcoin. Accordingly, a large amount of Bitcoin sales or purchases by an individual is often an indicator that the individual is involved in narcotics trafficking or the distribution of other illegal items. Individuals intending to purchase illegal items on Silk Road-like websites need to purchase or barter for Bitcoins. Further, individuals who receive Bitcoin as proceeds of illegal sales on Silk Road-like websites need to sell their Bitcoin to convert them to fiat currency. Such purchases and sales are often facilitated by peer-to-peer Bitcoin exchangers who advertise their services on websites designed to facilitate such transactions.

18. Dark web sites, such as Silk Road, AlphaBay, Empire, Dark0de, and ToRReZ, operate on “The Onion Router” or “Tor” network. The Tor network (“Tor”) is a special network of computers on the internet, distributed around the world, 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” operating on Tor have complex web addresses, which are many times generated by a computer algorithm, ending in “.onion” and can only be accessed through specific web browser software designed to access the Tor network.

19. Because of the anonymity they provide, traffickers frequently use dark web sites to advertise and sell illegal narcotics. In my training and experience, one of the illegal narcotics sold on the dark web is fentanyl. Fentanyl is a synthetic opioid up to fifty times stronger than heroin, and is a Schedule II substance controlled under federal law. *See* 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi). Fentanyl is frequently and falsely advertised on dark web vendor sites as

oxycodone. Legitimate oxycodone pills are legal under federal law if prescribed by a physician for pain management. Legitimate oxycodone pills are typically marked with an “M” on the front and with a “30” on the back. Hence, in my training and experience, counterfeit oxycodone pills that actually contain fentanyl are also marked with an “M” on the front and a “30” on the back to make these counterfeit pills appear to be legitimate oxycodone when, in fact, they are not.

**IV. FACTS ESTABLISHING PROBABLE CAUSE**

**A. Initiation of Investigation Into Dark Web Vendor “igogrraawwr.”**

20. On or around May 2, 2021, the NCIDE Task Force opened a joint investigation of a user identifying themselves as “igogrraawwr,” a dark web vendor suspected of mailing controlled substances via the USPS. “igogrraawwr” offered products for sale via a vendor site on a dark web marketplace for illicit sales known as ToRReZ. “igogrraawwr” created an account on the ToRReZ marketplace on or around December 27, 2020.

21. “igogrraawwr”’s listings described pills they were selling as “strong as fuck” and advised buyers to be careful. In my training and experience, the wording of these listings suggests that the pills contained a controlled substance. “igogrraawwr”’s vendor site offered customers various quantities of pressed oxycodone pills and stolen credit card information.

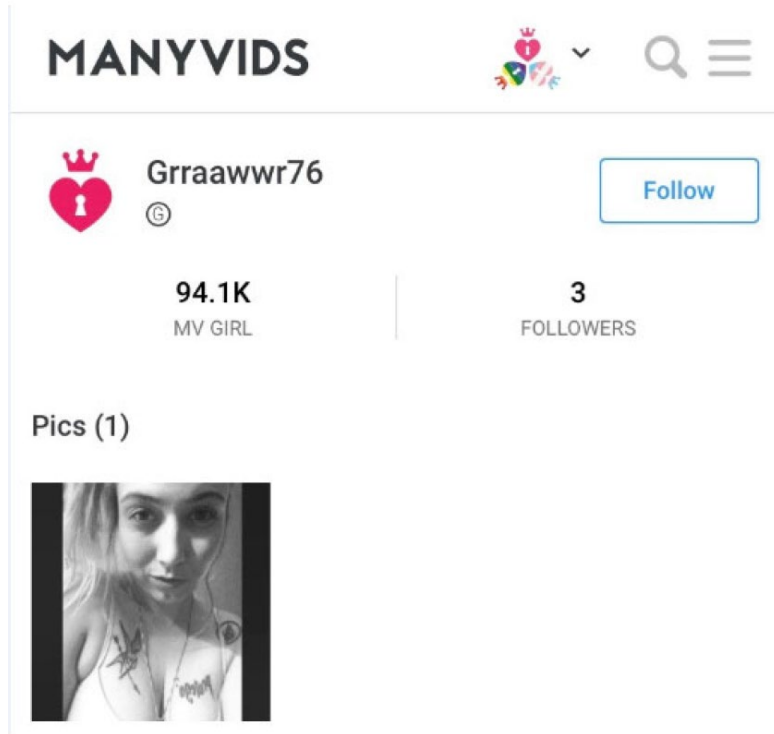
**B. “igogrraawwr” Is Connected to Adams and Hosner.**

22. I am familiar with Adams’s appearance from surveillance conducted of her during this investigation. I am also familiar with Adams’s and Hosner’s appearance because I interacted directly with them during execution of a search warrant at a hotel room where they were known to reside.

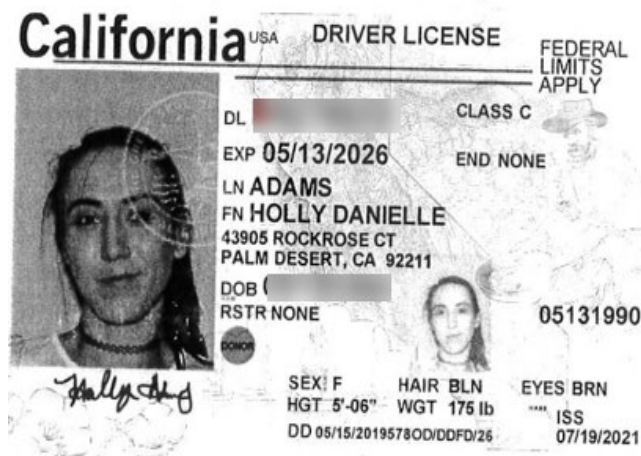
23. The PGP public key associated with “igogrraawwr” on ToRReZ listed [grraawwr76@gmail.com](mailto:grraawwr76@gmail.com) as the email address associated with “igogrraawwr.” Online research conducted of open source information revealed the existence of a user account on the adult website manyvids.com with the username “grraawwr76” and a profile image depicting Adams:

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24. On or around October 12, 2021, Adams applied for service at a USPS postal annex in Palm Desert, California. In connection with this application, Adams submitted (i) a copy of automobile insurance held jointly in her and Hosner's names, and (ii) a copy of a California driver license in her name that contained her photograph:



25. Based on my surveillance of and personal interaction with Adams during this investigation, I believe that Adams is the person depicted on the California driver license record and on the "grraawwr76" manyvids.com account depicted above. However, based on my



interactions with and surveillance of Adams in March 2022, it appears to me that Adams has gained weight since the pictures on her manyvids.com page and her driver license were taken.

26. On May 2, 2021, a member of the NCIDE Task Force, operating in an undercover capacity, conducted a purchase of 200 counterfeit oxycodone pills from “igogrraawwr” on the ToRReZ marketplace. On May 6, 2021, the parcel was delivered to an address controlled by law enforcement in the Eastern District of California.

27. The sender of the parcel purported to be an individual with the initials D.R., with a contact phone number of 760-777-2839.<sup>1</sup> Records maintained by the USPS for an eReg account<sup>2</sup> linked to telephone number 760-777-2839 show that this account is registered in the name of a person with the initials A.H. at 51240 Avenida Ramirez in La Quinta, California.<sup>3</sup>

28. California Department of Motor Vehicles records contain information for an individual with same name as A.H., and with a date of birth of May 13, 19XX.<sup>4</sup> I conducted a search of Thomson Reuters CLEAR, a public and proprietary records online database accessible with a paid subscription, for records relating to the name A.H. with the date of birth May 13, 19XX. This search revealed that A.H.’s most recent address was 80866 Brown Street, Indio, California 92201. I conducted a subsequent search of CLEAR for this address, which revealed that both Adams and Hosner were associated with that address in the past. USPS records also indicated that in 2021, numerous parcels were sent to Hosner and Adams at this address.

29. I conducted a search for information related to Hosner on open-source social media platforms. My search revealed an Instagram account with the handle “devlinhosner.”

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<sup>1</sup> The full name displayed as the sender of this parcel is known to law enforcement. This name is anonymized in this affidavit out of an abundance of caution to protect the privacy of third parties who are not, at this time, targets of any federal criminal investigation.

<sup>2</sup> An eReg account allows account holders to track shipments, obtain delivery confirmation, and perform other tasks relating to services provided by the USPS.

<sup>3</sup> The full name of A.H. is known to law enforcement. At this time, law enforcement believes that A.H. could be a victim of identity theft whose identity was used by Hosner and Adams to conceal their involvement in the dark web narcotics scheme under investigation. For this reason, A.H.’s name and email address are anonymized in this affidavit.

<sup>4</sup> Based on Adams’ California driver license, I know that Adams’s true date of birth is May 13, but in a different year than the year A.H. was born.

This Instagram account had zero posts. However, the “devlinhosner” account was following an Instagram account with the handle “hollygrraawwr.” The “hollygrraawwr” account was the only other Instagram account being followed by the “devlinhosner” account at the time.

30. Agents concluded that the use of different iterations of “grraawwr” in various online usernames was both unusual and similar to the manyvids.com and ToRReZ usernames associated with Adams. Based on this unusual similarity, agents conducted additional open-source research on Hosner and Adams. I reviewed publicly available images posted by the owner of the “hollygrraawwr” Instagram account, and these images suggest that Adams and Hosner were or are romantically involved. Furthermore, images posted to the “hollygrraawwr” Instagram account’s photo album contained the same image of Adams as the “grraawwr76” account on manyvids.com depicted above.

31. The “hollygrraawwr” Instagram account also displayed multiple images of a recognizable dog that appeared to belong to the owner of the “hollygrraawwr” Instagram account. The “hollygrraawwr” Instagram account contained hashtags appearing to be related to the owner’s dog, including the hashtag “lilination.” I recognized this dog to be the same animal displayed in images posted on the ToRReZ marketplace by the owner of the “igogrraawwr” vendor page on that dark web market site.

C. **Law Enforcement Conducted Multiple Undercover Purchases of Illegal Narcotics From “igogrraawwr.”**

32. Between May and September of 2021, NCIDE Task Force agents conducted at least four separate undercover purchases of counterfeit oxycodone pills from “igogrraawwr.” All of these undercover purchases occurred on the ToRReZ marketplace.

1. **May 2021: First Undercover Purchase.**

33. On or around May 2, 2021, a member of the NCIDE Task Force, operating in an undercover capacity, purchased 200 counterfeit oxycodone pills from “igogrraawwr” for \$1,000.00, plus \$15.00 for shipping, for a total of \$1,015.00, using Bitcoin. On or around May 4, 2021, “igogrraawwr” mailed the undercover purchase via United Parcel Service (“UPS”) from

the Palm Springs, California, area. On May 6, 2021, the parcel was delivered to an address controlled by law enforcement in the Eastern District of California.

34. On May 7, 2021, law enforcement opened the parcel. Inside the parcel were twenty-two grams (including the weight of packaging) of counterfeit pressed oxycodone pills secreted in a “Home Collection” satin pillowcase that appeared to be in its original packaging.

35. The suspected counterfeit pressed oxycodone pills from this purchase have not yet been sent to a DEA laboratory for testing.

2. May 2021: Second Undercover Purchase.

36. On or around May 31, 2021, a member of the NCIDE Task Force purchased thirty-five counterfeit oxycodone pills from “igogrraawwr” for \$360.00, plus \$10.00 for shipping, for a total of \$370.00, using cryptocurrency. The agent requested the illegal narcotics to be mailed to an undercover address controlled by law enforcement in the Eastern District of California.

37. On or around June 2, 2021, “igogrraawwr” mailed the undercover purchase via USPS from a post office in La Quinta, California. The sender and return address of this package mailed to law enforcement purported to be A.H. at 51240 Avenida Ramirez in La Quinta, California, and the package was mailed using a USPS tracking number known to law enforcement. Surveillance video from this post office captured Adams mailing this package on June 2, 2021:



38. On June 7, 2021, law enforcement opened the parcel mailed by Adams using this same USPS tracking number on June 2, 2021. Inside the parcel were five grams (including weight of packaging) of counterfeit pressed oxycodone pills secreted inside a “Nu-pore” cleansing nose strips box.

39. A DEA laboratory tested a subset of the pills from this purchase for the presence of illegal narcotics. The tests revealed that the pills contained fentanyl and acetaminophen.

3. July 2021: Third Undercover Purchase.

40. On or around July 19, 2021, a member of the NCIDE Task Force conducted a purchase of ten counterfeit oxycodone pills from “igogrraawwr” for \$120.00, plus \$10.00 in shipping, for a total of \$130.00, using cryptocurrency. The agent requested the illegal narcotics to be mailed to an undercover address controlled by law enforcement in the Eastern District of California.

41. On or around July 21, 2021, “igogrraawwr” mailed the undercover purchase via USPS from a post office in Palmdale, California. On July 23, 2021, the parcel was delivered to an address controlled by law enforcement. On August 11, 2021, law enforcement opened the parcel. Inside the parcel were two grams (including packaging weight) of counterfeit pressed oxycodone pills secreted inside a stationery set.

42. A DEA laboratory tested a subset of the pills from this purchase for the presence of illegal narcotics. The tests revealed that the pills contained fentanyl and acetaminophen.

4. September 2021: Fourth Undercover Purchase.

43. On or around September 2, 2021, a member of the NCIDE Task Force conducted a purchase of 300 counterfeit oxycodone pills from “igogrraawwr” for \$1,600.00, plus \$20.00 for shipping, for a total of \$1,620.00, using cryptocurrency. The agent requested the illegal narcotics to be mailed to an undercover address controlled by law enforcement in the Eastern District of California.

44. On or around September 3, 2021, “igogrraawwr” mailed the undercover purchase via USPS from a post office in Palmdale, California. On September 10, 2021, law enforcement

opened the parcel. Inside the parcel were thirty-four grams (including packaging weight) of counterfeit pressed oxycodone pills. The parcel also contained a “Ruby + Cash ‘You are Llamazing’” cosmetic bag, which in turn contained a variety of cosmetics and a white inner “Overplay Oversleep Overspend” bag. The pills were secured inside the “Overplay Oversleep Overspend” bag.

45. A DEA laboratory tested a subset of the pills from this purchase for the presence of illegal narcotics. The tests revealed that the pills contained fentanyl and acetaminophen.

**D. Adams and Hosner Used a Shipping Services Website to Send Hundreds of Packages Between May and September of 2021.**

46. Shipping Company 1 is a company that helps e-commerce businesses compare shipping rates; create shipping labels; ship packages through various shipping companies, including the USPS, UPS, Federal Express, and DHL; and track packages. Shipping Company 1 charges its customers a fee for this service.

47. Hosner opened a checking account with JPMorgan Chase Bank NA in or around the summer of 2020. I obtained and reviewed records from JPMorgan Chase relating to Hosner’s account. According to these records, Hosner is the only individual authorized to conduct transactions on this account. These records also reveal that between June 5, 2021, and August 5, 2021, Hosner’s account made approximately eighty payments to Shipping Company 1 totaling approximately \$8,600.

48. According to records provided to me by Shipping Company 1, on May 5, 2021, a customer associated with the email account [\[First name\]\[Last name\]513@gmail.com](mailto:[First name][Last name]513@gmail.com) created an account with Shipping Company 1.<sup>5</sup> Records provided to me by Shipping Company 1 also revealed that between May 10, 2021, and September 8, 2021, the account associated with the email address [\[First name\]\[Last name\]513@gmail.com](mailto:[First name][Last name]513@gmail.com) shipped approximately 1,150 packages. These packages were mailed to various individuals located all over the United States.

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<sup>5</sup> The first and last name contained in this email address are the same first and last name as A.H., who is referenced earlier in this affidavit. Shipping Company 1 does not require an individual seeking to open an account to provide a first and last name.

49. As a result of my training and experience, I know that dark web narcotics vendors frequently transport their products using USPS. The number of packages mailed by the [First name][Last name]513@gmail.com account (more than 1,000 packages), as well as the number of payments made by Hosner to Shipping Company 1 (approximately eighty payments totaling \$8,600), are consistent with the volume of shipments of illegal narcotics believed to be consummated by “igogrraawwr” on dark web marketplaces during this investigation.

50. According to records provided to me by Shipping Company 1, Shipping Company 1 charged the account associated with [First name][Last name]513@gmail.com to ship the four undercover purchases of illegal narcotics by law enforcement from “igogrraawwr” described previously in this affidavit.

**E. Hosner Used His Coinbase, PayPal, and JPMorgan Chase Accounts to Launder Bitcoin Received on the Dark Web by Converting It to Fiat Currency.**

51. Coinbase is an online cryptocurrency exchange where individuals can purchase or sell various types of cryptocurrencies, such as Bitcoin and Ethereum. Based on my training and experience investigating dark web narcotic operations, I know that dark web vendors often use cryptocurrency exchange companies such as Coinbase to cash out their illicit and fraudulently obtained proceeds. Doing so allows criminal to convert ill-gotten proceeds to fiat currency.

52. PayPal offers an online financial service that allows users to transfer fiat currency between accounts electronically. JPMorgan Chase is a traditional brick-and-mortar bank.

1. Hosner Used His Coinbase Account to Convert Bitcoin to Fiat Currency.

53. According to Coinbase records, Hosner opened a Coinbase account on or around March 31, 2021. Between April 29, 2021, and August 15, 2021 (which is the most recent date for which law enforcement has records relating to Hosner’s Coinbase account), Hosner sold in excess of \$800,000 worth of Bitcoin and converted the Bitcoin to dollars.

54. An FBI analyst reviewed Hosner’s Coinbase account for evidence of illegal activity. Using a proprietary blockchain investigative tool, the analyst traced 1.7902 Bitcoin, which totaled \$71,213.02 out of the approximately \$800,000 worth of Bitcoin that was deposited

into Hosner's Coinbase account during the investigative time period. The FBI analyst concluded that the Bitcoin deposits into Hosner's Coinbase account originated from the ToRReZ and World Market marketplaces.<sup>6</sup> Both of these marketplaces are located on the dark web and only exist to sell illegal narcotics and other contraband. Furthermore, during the investigation, agents routinely observed "igogrraawwr"'s vendor account on ToRReZ. At no time did "igogrraawwr" offer to sell anything that was not contraband.

55. Based on my training and experience and on facts I know from this investigation, I believe that all or most of the \$71,213.02 worth of Bitcoin deposited into Hosner's Coinbase account consists of proceeds of illegal drug trafficking paid to "igogrraawwr."

**F. Adams and Hosner Continue to Distribute Narcotics Under Alternative Dark Web Identities "grraawwr760" and "its4real."**

56. On or around September 8, 2021, Adams and Hosner were arrested by local law enforcement and subsequently released.

57. Following this arrest and release, a member of the NCIDE Task Force operating undercover used an encrypted messaging application known as Wickr to contact an account on Wickr with the account name "grraawwr760."<sup>7</sup>

58. On December 9, 2021, the undercover agent sent a message on Wickr to "grraawwr760" asking if they were back in business. Several hours later, the undercover agent received a reply from "grraawwr760." In the ensuing conversation, "grraawwr760" confirmed their identity as "igogrraawwr" by providing the surname previously used by the undercover agent in that agent's prior undercover purchases from "igogrraawwr." In the same conversation, "grraawwr760" indicated that they were absent from dark web vending because they "had to deal

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<sup>6</sup> The FBI analysis revealed that the traced Bitcoin (1.7902 Bitcoin, totaling \$71,213.02) was a one-hop transaction from one cryptocurrency wallet address associated to a dark web marketplace to a different cryptocurrency wallet address belonging to Hosner.

<sup>7</sup> "igogrraawwr" previously used "grraawwr760" to communicate with undercover law enforcement on Wickr regarding narcotics orders placed on dark web vendor accounts run by "igogrraawwr." Furthermore, the "igogrraawwr" vendor page on the ToRReZ marketplace contained the following statement in May 2021: "I will give u my wickr so u can contact me faster there....its grraawwr760."

with old warrants and that's why I was Mia for a min." "grraawwr760" also stated, "But been bk for a couple months but again only on here to select ppl who have ordered from me a decent amount of times, my top top regulars."

59. "grraawwr760" then confirmed that they were going to re-supply their narcotics the next day, and informed the undercover agent that "grraawwr760" would fill new orders if the undercover agent wanted to purchase any counterfeit oxycodone. "grraawwr760" said of the pills, "Do u snort or smoke them? (They're good for either way) if u snort them, my ppl who also snort tell me these are great because 1 potency and 2 they break down easier, like not so hard to crush. Lol If u smoke them then they have the super popcorn taste and when smoked on foil give the golden trails."

60. The undercover agent inquired if "grraawwr760" intended to operate on a marketplace again, to which "grraawwr760" replied, "Nah. I don't want to be open to new customers just regulars." The undercover agent requested a photo of the counterfeit oxycodone that "grraawwr760" was offering to sell. On or about December 11, 2021, "grraawwr760" sent a photograph of pills held in an open hand. "grraawwr760" also provided a Bitcoin address for payment.<sup>8</sup> The undercover agent did not finalize a purchase at the time.

61. On or around January 29, 2022, the undercover agent received a message on Wickr from "grraawwr760" with a link to the Dark0de marketplace profile of a vendor with the name "its4real" and the message, "This may or may not be me hehe." "grraawwr760" also stated, "also always welcome to do direct deals with me. The new profile is a collaboration, so it's me working with a few ppl in a group instead of me running it solo."

1. January 2022: Fifth Undercover Purchase.

62. On or around January 30, 2022, a member of the NCIDE Task Force purchased a sample pack of pressed m30 (counterfeit oxycodone) pills from "its4real" on the Dark0de marketplace for \$200.00, plus \$30.00 for express shipping, totaling \$230.00. The undercover

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<sup>8</sup> Agents traced the Bitcoin address provided by "grraawwr760" and determined that between December 11 and 16, 2021, that address received approximately six incoming payments.



agent used cryptocurrency for this purchase and requested the illegal narcotics to be mailed to an undercover address controlled by law enforcement in the Eastern District of California.

63. On or around February 2, 2022, “its4real” mailed the undercover purchase via a tracked USPS package placed into the mail stream at a postal annex located at 83103 Avenue 48, Suite 1B, Coachella, California.<sup>9</sup> On February 4, 2022, law enforcement opened the parcel. The parcel contained a holiday gift bag with an inner restaurant style take-out box containing a variety of trinkets and jewelry. Secreted within the take-out box was a sealed mylar baggie. The mylar baggie contained twenty-five round, blue pills, stamped on one side with “M” and on the other side with “30.”

64. The total weight of the suspected counterfeit oxycodone pills, including the packaging, was four grams. The suspected counterfeit pressed oxycodone pills from this purchase have not yet been sent to a laboratory for testing.

2. February 2022: Sixth Undercover Purchase.

65. On or around February 7, 2022, an FBI agent purchased 100 pressed m30 (counterfeit oxycodone) pills from “its4real” on the Dark0de marketplace for \$640.00, plus \$40.00 for shipping, plus a Dark0de marketplace commission fee of \$20.40, for a total of \$700.40. The FBI agent used cryptocurrency to make this purchase.

66. On February 9, 2022, “its4real” mailed the undercover purchase via UPS from an unknown location. On or around February 10, 2022, the parcel was delivered to an address controlled by law enforcement in the Central District of California. On or around February 15, 2022, law enforcement opened the parcel. The parcel contained a multicolored giftbag, inside of which were D’Bello hair-ties and scrunchies, a D’Bello piece of jewelry, and a “Lil Crochet Friends Lion Kit by Loops & Threads” crochet kit. Secreted inside the crochet kit was a sealed mylar baggie containing 100 round, blue pills, stamped on one side with “M” and on the other side with “30.”

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<sup>9</sup> This is the same postal annex where, as described above in this affidavit, Adams previously applied for USPS service using her California driver license and proof of insurance in her and Hosner’s names.

67. The total weight of the suspected counterfeit oxycodone pills, including the packaging, was sixteen grams. The suspected counterfeit pressed oxycodone pills from this purchase have not yet been sent to a laboratory for testing.

3. February 2022: Seventh Undercover Purchase.

68. On or around February 8, 2022, a member of the NCIDE Task Force purchased 150 pressed m30 (counterfeit oxycodone) pills from “its4real” on the Dark0de marketplace for \$875.00, plus \$30.00 for express shipping. The agent used cryptocurrency for this purchase and requested the illegal narcotics to be mailed to an undercover address controlled by law enforcement in the Eastern District of California.

69. After making this order, the undercover agent alerted “grraawwr760” on Wickr that another order had been placed. On or around February 11, 2022, the undercover agent asked “grraawwr760” for an update on the package, to which “grraawwr760” replied that they dropped the shipment at the post office the prior day and provided a tracking number.

70. On or around February 10, 2022, “its4real” mailed the undercover purchase from a post office in Palm Desert, California. On or around February 12, 2022, the parcel was delivered to the specified address controlled by law enforcement. After the package was delivered, also on or around February 12, 2022, the undercover agent alerted “grraawwr760” on Wickr that the package had been received and that the undercover agent would release the payment funds for the purchase from escrow on Dark0de.

71. On or around February 14, 2022, law enforcement opened the parcel. The parcel contained several miscellaneous items including a notebook, a headband, socks, and a tie dye kit. Secreted with the items was a sealed white mylar baggie labeled “Sweet Decades” with a picture of a 24K goat. The mylar baggie had “150” handwritten on it and contained round, blue pills, stamped on one side with “M” and on the other side with “30.”

72. The total weight of the suspected counterfeit oxycodone pills, including the packaging, was eighteen grams. The suspected counterfeit pressed oxycodone pills from this purchase have not yet been sent to a laboratory for testing.

73. On or around February 14, 2022, “grraawwr760” notified the undercover agent that, “I got the release thanks so much! Glad to do biz with u!!” The undercover agent replied by complimenting “grraawwr760” on the decoys used in their packages to hide narcotics.

74. The undercover agent also commented on the photograph that “grraawwr760” had added to their Wickr profile. This photograph is of the same dog from Adams’s Instagram account and “igogrraawwr”’s ToRReZ vendor page described earlier in this affidavit. “grraawwr760” replied, “She’s a chow chow chihuahua I got her doggy DNA done lol.” When asked about the dog’s name, “grraawwr760” replied, “Lili (Lee lee).”

4. February 2022: Eighth Undercover Purchase.

75. On or around February 21, 2022, a member of the NCIDE Task Force purchased 150 pressed m30 (counterfeit oxycodone) pills from “its4real” on the Dark0de marketplace for \$875.00, plus \$30.00 for express shipping. The agent used cryptocurrency to pay for this purchase and requested the illegal narcotics to be mailed to an undercover address controlled by law enforcement in the Eastern District of California.

76. On or around February 21, 2022, “its4real” mailed the undercover purchase. The first parcel scan occurred at a USPS processing and distribution center located in San Bernardino, California. On or around February 24, 2022, law enforcement opened the parcel. The parcel contained a plastic bag, inside of which was a dishtowel set, socks, and a bead jewelry set. Secreted within these items was a sealed mylar baggie labeled “Sweet Decades” with a picture depicting an American currency money clip. The mylar baggie had “150” handwritten on it and contained round, blue pills, stamped on one side with “M” and on the other side with “30.”

77. The total weight of the suspected counterfeit oxycodone pills, including the packaging, was eighteen grams. The suspected counterfeit pressed oxycodone pills from this purchase have not yet been sent to a laboratory for testing.

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78. On or around February 23, 2022, the Dark0de marketplace conducted an exit scam.<sup>10</sup> As a result, “its4real” never received the undercover agent’s payment for the 150 pressed m30 (counterfeit oxycodone) pills purchased on February 21, 2022.

79. On or around February 23, 2022, the undercover agent sent a message on Wickr to “grraawwr760” and offered to send a new payment for the February 21 order via a payment transfer service called Venmo. “grraawwr760” claimed not to have Venmo, but provided a Cash App username at which “grraawwr760” could be paid for the narcotics shipment. This Cash App username was “\$tpeargin.” The undercover agent told “grraawwr760” that he would pay in Bitcoin instead and requested an address for payment. On or around February 26, 2022, “grraawwr760” provided a Bitcoin address, at which time the undercover agent sent approximately 0.02167532 Bitcoin, or \$850.00, for the February 21 purchase.

5. Further Evidence Linking Adams and Hosner to “grraawwr760.”

80. After “grraawwr760” provided the Cash App username of “\$tpeargin,” an undercover agent viewed this Cash App profile and observed that the name associated with the account was an individual with the initials T.P.<sup>11</sup> Agents queried law enforcement databases for the name T.P. and learned that PayPal previously identified T.P., Adams, Hosner, and two other individuals as potentially operating an identity theft ring using PayPal. According to PayPal records, accounts controlled by Adams and Hosner made several suspicious purchases.

81. Specifically, on an unknown date, Hosner purchased at least two fully encrypted cellular telephones from sinilab.com and kryptall.com. Adams made several purchases from eBay.com for blank checks, a chip blank smart card, and a clothing security tag remover.

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<sup>10</sup> An exit scam is when a marketplace accepts orders and receives money into escrow for those orders, but does not release the money to the vendors who sold the illegal narcotics and other items bought on the marketplace. The marketplace then shuts down its servers and absconds with money still in escrow from both buyers and sellers.

<sup>11</sup> T.P.’s purported full name is known to law enforcement, but T.P.’s full name is anonymized in this affidavit out of an abundance of caution.

6. March 2022: Ninth Undercover Purchase.

82. On or around March 1, 2022, a member of the NCIDE Task Force contacted “grraawwr760” using Wickr. The undercover agent arranged for the purchase of 150 counterfeit oxycodone pills and requested the illegal narcotics to be mailed to an undercover address controlled by law enforcement in the Eastern District of California. On or around March 2, 2022, the undercover agent paid \$900.00 for the counterfeit oxycodone, plus \$40.00 for express shipping, using cryptocurrency.

83. On or around March 3, 2022, “grraawwr760” mailed the undercover purchase from the Cathedral City, California area. On or around March 4, 2022, the parcel was delivered to the specified address controlled by law enforcement.

84. On or around March 7, 2022, law enforcement opened the parcel. The parcel contained a cosmetic bag inside a larger plastic bag and holding a variety of cosmetic products and a stuffed animal coin purse. Secreted within the coin purse was a sealed mylar baggie labeled “Sweet Decades” with a picture depicting an American currency money clip. The mylar baggie had “150” handwritten on it and contained round, blue bills, stamped on one side with “M” and on the other side with “30.”

85. The total weight of the suspected counterfeit oxycodone pills, including the packaging, was eighteen grams. The suspected counterfeit pressed oxycodone pills from this purchase have not yet been sent to a laboratory for testing.

7. March 2022: Tenth Undercover Purchase.

86. On or around March 9, 2022, a member of the NCIDE Task Force contacted “grraawwr760” using Wickr. The undercover agent arranged for the purchase of 100 counterfeit oxycodone pills and requested the illegal narcotics to be mailed to an undercover address controlled by law enforcement in the Eastern District of California.

87. While arranging this purchase, the undercover agent asked “grraawwr760,” “Do u know what is exactly in ur blues? I popped a blue from a girlfriend and it was so weak. She said it was etazeen or something.” On March 10, 2022, “grraawwr760” replied, “Usually there

supposed to be pressed with fentanyl and that's what's in mine, hers are some fake weak shit.” On or around March 15, 2022, the undercover agent paid \$700.00 for the counterfeit oxycodone, plus \$40.00 for express shipping, using cryptocurrency.

88. On or around March 19, 2022, “grraawwr760” mailed the undercover purchase from the Moreno Valley, California area. On or around March 22, 2022, the parcel was delivered to the specified address controlled by law enforcement.

89. On or around March 23, 2022, law enforcement opened the parcel. The parcel contained a 2022 calendar, a gift bag, and a “Happy Birthday” box. Inside the “Happy Birthday” box was a black mylar baggie that contained round, blue pills, stamped on one side with “M” and on the other side with “30.”

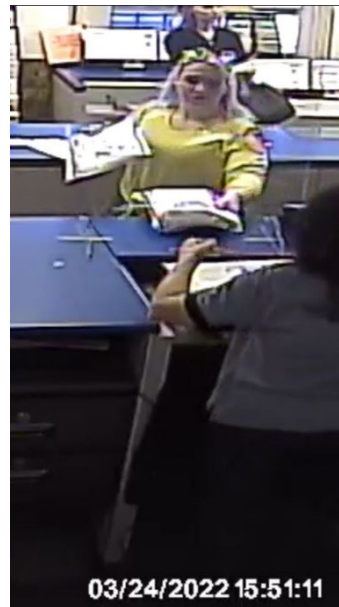
90. The total weight of the suspected counterfeit oxycodone pills, including the packaging, was twelve grams. The suspected counterfeit pressed oxycodone pills from this purchase have not yet been sent to a laboratory for testing.

8. March 2022: Eleventh Undercover Purchase.

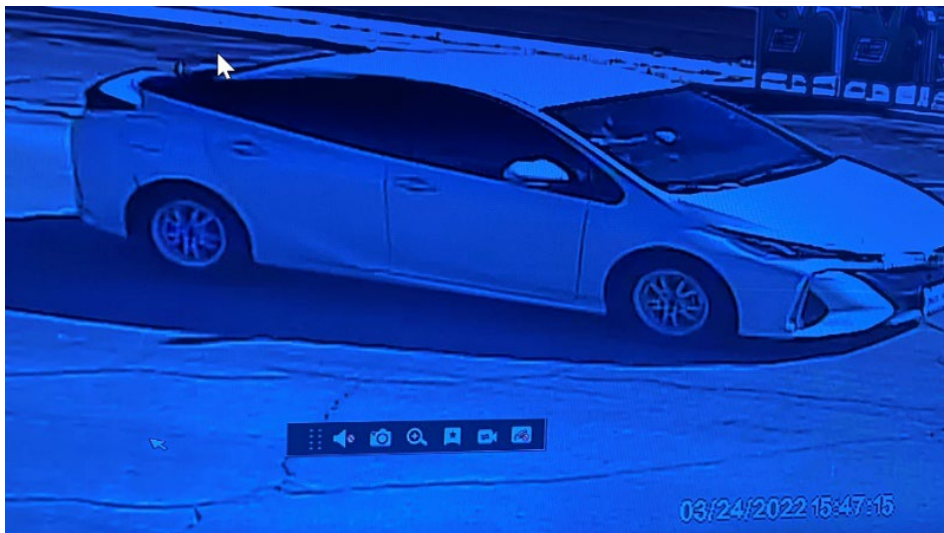
91. On or around March 23, 2022, a member of the NCIDE Task Force contacted “grraawwr760” using Wickr. The undercover agent arranged for the purchase of 400 counterfeit oxycodone pills and requested the illegal narcotics to be mailed to an undercover address controlled by law enforcement in the Eastern District of California. On or around March 24, 2022, the undercover agent paid \$2,000.00 for the counterfeit oxycodone, plus \$30.00 for express shipping, using cryptocurrency.

92. On or around March 24, 2022, “grraawwr760” mailed the undercover purchase from a post office located in Palm Desert, California. On or around March 26, 2022, the parcel was delivered to the specified address controlled by law enforcement.

93. On March 28, 2022, law enforcement reviewed video surveillance footage from the Palm Desert post office recorded on March 24, 2022. The video surveillance footage depicted Adams mailing the parcel that was subsequently received by law enforcement in the Eastern District of California:



94. Exterior surveillance cameras near the Palm Desert post office also captured a white Toyota Prius arriving at the post office prior to Adams mailing the undercover purchase on March 24, 2022:



95. According to California DMV records, Adams is the register owner of a 2020 Toyota Prius bearing California license plate number 8NDG907. Furthermore, during surveillance on March 28, 2022, law enforcement agents observed Adams driving a white Toyota Prius bearing California license plate number 8NDG907 in the greater Palm Desert, California area.

96. On or around March 31, 2022, law enforcement opened the parcel mailed by Adams on March 24, 2022. The parcel contained a gift bag with crinkle cut packaging material, nail files, earrings, and a pink leopard print pouch. Secreted within the pouch was a sealed white mylar baggie labeled “Sweet Decades” with a picture of a 24K goat. The mylar baggie had “400” written on it and contained round, blue pills, stamped on one side with “M” and on the other side with “30.”

97. The total weight of the suspected counterfeit oxycodone pills, including the packaging, was forty-six grams. The suspected counterfeit pressed oxycodone pills from this purchase have not yet been sent to a laboratory for testing.

9. March 2022: Twelfth Undercover Purchase.

98. On or around March 27, 2022, a member of the NCIDE Task Force contacted “grraawwr760” using Wickr. The undercover agent arranged for the purchase of 1,775 counterfeit oxycodone pills and 2 ounces of crystal methamphetamine. The undercover NCIDE agent requested the illegal narcotics to be mailed to an undercover address controlled by law enforcement in the Eastern District of California.

99. On March 28, 2022, “grraawwr760” sent the undercover agent a message via Wickr suggesting that the undercover agent pay “grraawwr760” for this narcotics purchase via Zelle, which is a digital payments network owned by numerous brick-and-mortar financial institutions such as Bank of America and JPMorgan Chase. “grraawwr760” explained to the undercover agent that using Zelle for the narcotics purchase was preferable because “grraawwr760” wanted the cash in a bank account.

100. The undercover agent proposed to send half of the payment via Bitcoin and to deposit the other half of the payment in “grraawwr760”’s bank account on March 29, 2022. “grraawwr760” agreed to this arrangement and provided the undercover agent with a Bitcoin wallet address to which to send the Bitcoin. “grraawwr760” provided the undercover agent with a Bank of the West account number and routing number, and told the undercover agent that this Bank of the West account was held in the name of “Holly Adams.”



101. On or around March 28, 2022, the undercover agent paid \$4,530.00 for the counterfeit oxycodone and crystal methamphetamine, plus \$30.00 for express shipping, using cryptocurrency. The undercover agent did not transfer the remainder of the money into the Bank of the West account in Adams's name, because law enforcement agents executed search warrants related to Adams and Hosner on March 29, 2022, as described below.

**G. Law Enforcement Recovered Additional Evidence of Narcotics Trafficking and Other Illegal Activity Inside a Hotel Room Associated With Hosner and Adams.**

102. On March 29, 2022, law enforcement agents executed a search warrant at a room at the Indian Wells Resort Hotel, located at 76661 Palمرas Road, CA-111, in Indian Wells, California.

103. Inside this hotel room, agents found Hosner and Adams as well as two other people who agents believe to be unconnected to the conspiracy. Agents also found Adams's dog LiLi in the hotel room. Also in the room, agents found and seized approximately 10,000 pills stamped on one side with "M" and on the other side with "30." These pills appeared to be the same kind of pills that were previously sent to undercover agents after dark web purchases, and that tested positive for fentanyl.

104. Inside this hotel room, agents recovered over two ounces of a substance believed to be methamphetamine, intravenous needles, and packaging materials. Specifically, in a separate part of the hotel room used by Hosner and Adams, agents located and seized a mechanical device used to seal plastic bags. In my training and experience, this type of device can seal mylar bags of the kind that were used to secrete the counterfeit oxycodone pills recovered by law enforcement during the undercover portion of this investigation.

105. Laboratory tests of portions of the suspected narcotics seized in the hotel room associated with Hosner and Adams are pending.

**V. CONCLUSION**

106. Based on the facts set forth in this affidavit, I submit that probable cause exists to believe that Hosner and Adams violated federal criminal law by, *inter alia*, conspiring to

distribute and to possess with intent to distribute controlled substances, in violation of 21 U.S.C. §§ 846 and 841(a)(1). Accordingly, I respectfully request that the Court issue arrest warrants for Adams and Hosner.

**VI. REQUEST FOR SEALING**

107. I respectfully request that the Court issue an order sealing this affidavit and the associated criminal case until further order of the Court. Based upon my training and experience, I know that online criminals actively search for criminal affidavits via the internet and disseminate them to other people who desire information about law enforcement's operation on the dark web. Premature disclosure of the contents of this affidavit could cause the subjects to destroy evidence, flee from prosecution, jeopardize the safety of law enforcement executing arrest warrants, and notify confederates. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation.

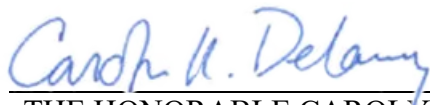
Respectfully submitted,

/s/

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CHRISTOPHER FITZPATRICK  
Special Agent  
IRS-Criminal Investigation

Subscribed and sworn to before me telephonically on: April 7, 2022 at 1:15 pm



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THE HONORABLE CAROLYN K. DELANEY  
United States Magistrate Judge

/s/ SAM STEFANKI

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Approved as to form by AUSA SAM STEFANKI