

**COPY**

AO 91 (Rev. 11/82)

**CRIMINAL COMPLAINT**

UNITED STATES DISTRICT COURT		CENTRAL DISTRICT OF CALIFORNIA	
UNITED STATES OF AMERICA v. GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, DYLAN SIMPSON		DOCKET NO.	16-0501M
		MAGISTRATE'S CASE NO.	<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: auto;">                     MAR 8 2016  <small>CENTRAL DISTRICT OF CALIFORNIA BY DEPUTY</small> </div>
Complaint for violation of Title 21, United States Code, Section 841(a)(1) and 846; Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), 1956(a)(2)(A), 1956(h) and 1957.			
NAME OF MAGISTRATE JUDGE		UNITED STATES	LOCATION
HONORABLE CHARLES EICK		MAGISTRATE JUDGE	Los Angeles, California
DATE OF OFFENSE	PLACE OF OFFENSE	ADDRESS OF ACCUSED (IF KNOWN)	
Beginning on unknown date and continuing until March 8, 2016	Los Angeles and Orange Counties		
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:  Beginning on an unknown date and continuing until on or about March 8, 2016, defendants GARY RESNIK, JOSEPH STANLEY, CHRISTOPHER BOWEN, DYLAN SIMPSON did will and knowingly conspire to commit, and commit, violations of Title 21, United States Code, Sections, 841(a)(1) and 846; conspiracy to distribute controlled substances, possession with intent to distribute, and distribution of controlled substances, including acetyl-fentanyl and methamphetamine; and, Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), 1956(a)(2)(A), 1956(h) and 1957, money-laundering in furtherance of unlawful drug trafficking, conspiracy to engage in money-laundering, and money-laundering in furtherance of specified unlawful activity.			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:  (See attached affidavit which is incorporated as part of this Complaint)			
MATERIAL WITNESSES IN RELATION TO THIS CHARGE: N/A			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT		
	Lindsey Bellomy <span style="float: right; font-family: cursive; font-size: 1.2em;">CHARLES EICK /s/</span>		
	OFFICIAL TITLE		
	Special Agent, Drug Enforcement Administration		
Sworn to before me and subscribed in my presence,			
SIGNATURE OF MAGISTRATE JUDGE <sup>(1)</sup>			DATE
CHARLES F. EICK			March 7, 2016

<sup>(1)</sup> See Federal Rules of Criminal Procedure 3 and 54

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AFFIDAVIT IN SUPPORT OF COMPLAINT, ARREST AND SEARCH WARRANTS

I, Lindsey Bellomy, being duly sworn, hereby state as follows:

INTRODUCTION AND OFFICER BACKGROUND

1. I am a Special Agent (SA) with the United States Department of Justice, Drug Enforcement Administration (DEA) and have been so employed since December 2010. I am currently assigned to the Los Angeles Field Division (LAFD) Orange County Resident Office (OCRO), enforcement Group Two. As such, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7); that is, an officer of the United States empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. I have received training and have experience investigating violations of federal narcotics and money laundering laws, including but not limited to, Title 21, United States Code, Sections 841, 843, 846, 952, 959 and 963 and Title 18, United States Code, Section 1956(a). I have been involved in various electronic surveillance investigations and the debriefing of defendants, informants and witnesses, as well as others who have knowledge of the manufacturing, distribution, transportation, storage and importation of controlled substances and the laundering of drug proceeds. Prior to my assignment at the LAFD, I completed the DEA Basic Agent Training Academy in Quantico, Virginia. The DEA Basic Agent Training Academy is a

comprehensive training academy that all DEA Special Agents complete. During the course of my employment, I have received comprehensive, formalized instruction to include such topics as drug identification, money laundering techniques, patterns of drug trafficking, complex conspiracies, the exploitation of narcotics traffickers' telecommunications devices, criminal law, surveillance, and other investigative techniques.

2. Throughout my law enforcement career, I have investigated individuals and criminal organizations which have represented a significant threat to public safety and national security. I have participated in numerous investigations into the unlawful importation, manufacture, possession with intent to distribute, and distribution of narcotics and controlled substances, the laundering of narcotics proceeds, and conspiracies associated with narcotics offenses. In conducting these investigations, I have utilized a variety of investigative techniques and resources, including but not limited to, surveillance, confidential source debriefings, telephone toll analysis, and wire communications analysis in Title III and California State wiretap investigations.

3. I have participated in many aspects of drug investigations, including investigations into the smuggling of illegal drugs, money laundering, and extortion related to drug trafficking. I am familiar with narcotics traffickers' methods of operation, including the manufacturing, storage, transportation, and distribution of narcotics, the collection of money that represents the proceeds of narcotics trafficking, and

money laundering. I am also familiar with the manner in which narcotics traffickers transport and distribute narcotics in areas they control. I am familiar with how drug traffickers utilize counter-surveillance techniques to avoid detection by law enforcement. I know that drug traffickers often also possess firearms and firearm ammunition, or have them present where they maintain drugs and or drug proceeds. They do this both to protect themselves when conducting unlawful activities, and to prevent theft and robbery by other persons who might become aware of their activities and the presence of drugs and money. I also know that drug traffickers often communicate with their drug-trafficking associates through the use of cellular telephones. I have become aware that more sophisticated drug trafficking networks now utilize e-mail, BlackBerry devices, Voice over Internet Protocol, video chat, internet messaging services, and social networking sites to communicate with one another. During drug-related communications, traffickers often use coded or cryptic language to disguise the drug-related nature of their conversations.

**PURPOSE OF THE AFFIDAVIT**

4. Based on the evidence obtained in this investigation to date, I believe there is probable cause to believe that Gary RESNIK (RESNIK), Joseph STANLEY (STANLEY), Christopher BOWEN (BOWEN) and Dylan SIMPSON (SIMPSON), and others, have violated Title 21, United States Code, Sections, 841(a)(1) and 846; conspiracy to distribute controlled substances, possession with intent to distribute, and distribution of controlled substances,

including acetyl-fentanyl and methamphetamine; and money-laundering in furtherance of unlawful drug trafficking, conspiracy to engage in money-laundering, and money-laundering in furtherance of specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), 1956(a)(2)(A), 1956(h) and 1957. This affidavit in support of a complaint and arrest warrants for each of these persons, that is, RESNIK, STANLEY, BOWEN and SIMPSON.

5. In addition, this affidavit is in support of search warrants for locations associated with these persons. These locations are:

a. 5995 E. Pacific Coast Highway, Unit 1, Long Beach, California 90803, the residence of RESNIK (and his girlfriend, Megan Foster), **Subject Premises #1;**

b. 16692 Irby Lane, Huntington Beach, California 92647, the residence of STANLEY, **Subject Premises #2;**

c. 939 S. Hill Street, Apartment #248, Los Angeles, California 90015, parking space #2052, the residence of BOWEN, **Subject Premises #3;**

d. 16356 Filbert Street, Fountain Valley, California 92708, the residence of SIMPSON, **Subject Premises #4;**

e. 4151 Harlan Avenue, Baldwin Park, California 91706, believed to be used as a manufacturing and storage location for illegal drugs, **Subject Premises #5;** and,

f. 17300 Newhope Street, Unit 210C, Fountain Valley, California, the Public Storage unit rented by SIMPSON, **Subject Premises #6.**

PROBABLE CAUSE

Background of the Investigation

6. Since April 2015, I and agents in my investigative group have been investigating narcotics manufacturing and distribution activities by Gary RESNIK and his co-conspirators, including other persons named in this affidavit, STANLEY, SIMPSON and BOWEN. A review of the background of RESNIK indicates that in 2008 he was convicted of felony possession of marijuana for sale in California and received a probationary sentence; in 2011, he was convicted in California of felony possession for sale of methamphetamine and received a two-year prison sentence; on May 3, 2013, he was arrested pursuant to a California State search warrant at 401 Rockefeller, Unit B 1103, Irvine, California 92612. Pursuant to that search, agents seized approximately 3.2 grams of cocaine, 11.9 grams of methamphetamine, 21.2 grams of MDMA, and subsequently arrested RESNIK for possession of controlled substances. He was later convicted in California state court of possession of methamphetamine for sale and sentenced to 3 years in prison.

7. On April 3, 2015, DEA Staff Coordinator (SC) Connie Carey informed me that United States Customs and Border Protection (CBP) Officer Lionel Andrade contacted her inquiring if DEA had received a notice to import a pill press from China. SC Carey informed Officer Andrade that no DEA notice was received by the importer for the pill press, as required by Code of Federal Regulation Section 133.02. Officer Andrade provided

SC Carey with the name of the consignee of the pill press as Gary RESNIK, doing business as "Beyond your Dreams," with an address of 5995 East Pacific Coast Highway, Long Beach, California 90803 (**Subject Premises #1**), telephone number 562-666-1471, and Social Security Number ending in 8934. The shipment of the pill press arrived at Los Angeles International Airport on or about March 22, 2015, as informed by Officer Andrade. SC Carey then passed the information along to SA Waseel Chenavo and me. A review of United States Customs records further revealed that, on or about March 22, 2015, RESNIK received a shipment labeled as "Carbonxymethycellulose Sodium" to an address at 6008 Bixby Village Road, Long Beach, California 90803. Based on public source information, "Carbonxymethycellulose Sodium" is used as a disintegrant in pharmaceutical manufacturing, that is, a substance mixed into tablets that causes the tablets to disintegrate in contact with saliva or other liquids. The shipment was approximately 30 kilograms in weight. The shipment was later released to RESNIK. On April 13, 2015, the Honorable Douglas F. McCormick, United States Magistrate Judge, signed a warrant to place and use a GPS tracking device in the pill-press shipment.

**The June 24, 2015, Seizure of Approximately 13 Kilograms of Acetyl-Fentanyl and the Arrest of Gary RESNIK**

8. Based on the information obtained from the GPS tracking device in the pill-press shipment, and other information, on June 24, 2015, DEA agents executed three search warrants at a warehouse, residence (**Subject Premises #1**), and

vehicle associated with RESNIK. Pursuant to the execution of the search warrants, agents seized six pill presses, approximately 12,995 grams (net) of acetyl-fentanyl, approximately 7.2 grams (net) of methamphetamine, and other narcotics paraphernalia. Megan Foster, RESNIK's girlfriend, was also present at **Subject Premises #1**. Agents subsequently arrested RESNIK for possession with intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1). A criminal complaint was filed but later dismissed as agents continued to examine the items seized and conduct an investigation of RESNIK's associates.<sup>1</sup>

9. Among the items seized at the warehouse (at 2621 E. 67<sup>th</sup> Street, Unit H, Long Beach, California), where the pill presses and acetyl-fentanyl were seized, were shipping and other documents in the name of Christopher BOWEN. Specifically, one item showed BOWEN in the return address of a UPS shipping document. A document showing a cashier's check from Chase Bank dated April 30, 2015, showed the remitter as being "Christopher P. Bowen." A sales order receipt from Aaron Packaging, Inc., showed the ship to address as being "Christopher Bowen" at 5995

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<sup>1</sup> At that time, in June 2015, acetyl-fentanyl was not specifically a scheduled controlled substance. Fentanyl was a scheduled controlled substance as can be seen in 21 U.S.C. § 812(d)(1)(2)(B)(b)(6). Acetyl-fentanyl became a Schedule I controlled substance in July 2015, after the seizure of the items from the warehouse. However, 21 U.S.C. § 813 states, "A controlled substance analogue shall, to the extent intended for human consumption, be treated, for the purposes of any Federal law as a controlled substance." Based on discussions with DEA experts and chemists, the seized acetyl-fentanyl is a chemical analogue of fentanyl.



E. Pacific Coast Highway, Apt. 1, Long Beach, California 90803,  
**Subject Premises #1.**

10. Cellular telephones were seized from RESNIK. On July 15, 2015, the Honorable John E. McDermott, United States Magistrate Judge, signed a search warrant for three devices. On one of the telephones was the number (714) 317-8757 with the name listed for the number as "STANLEY," whom I suspect, for the reasons stated below, to be Joseph STANLEY.

Recorded Metropolitan Detention Center Call Between Gary RESNIK and Joseph STANLEY on July 23, 2015

11. As noted above, RESNIK was arrested on June 24, 2015, but the complaint and charges were later dismissed. While RESNIK was in custody at the Metropolitan Detention Center, Los Angeles, I obtained calls made by RESNIK. During a July 23, 2015 telephone communication, in the context of discussing using BlackBerry devices to communicate, the following exchange was recorded:<sup>2</sup>

RESNIK: So what's up with the Berries?

UM: I don't know. I tossed them all in storage when the shit went down.

RESNIK: Oh no dude, you gotta be using those things.

UM: I thought you said get rid of them?

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<sup>2</sup> The file name of this recorded telephone communication is "69219112\_Jul\_23\_2015\_17\_50\_06\_PM\_6572447198," that is, that the call from the MDC-LA was with telephone number (657) 244-7198. The quoted communications provided here were derived from the MDC call recordings and were in English but are not official transcripts of the recorded communications.

RESNIK: No, no, just get new numbers. Oh no. You've got to be using those things dude. Those things are what's gonna... yeah. No. Get those things out and give them back to everybody. Get Ceto to go get new lines. Yeah.

UM: Alright. Are those old ones still gonna work if I talk to Bloomberg or are they burnt right now?

RESNIK: No, no, they're fine.

UM: They're still up and running then? Okay, then I'll talk to him and then what? Get all brand new ones or just get new numbers?

RESNIK: No. Just get new SIM cards and new numbers.

UM: Okay. For sure. I still have mine. I didn't throw it away I just put it away . . . you know?

12. Later in the same July 23, 2015 conversation, the following exchange occurred:

UM: Everything's going steady and hopefully everything's going good with the homies and I could, you know, as it should be.

RESNIK: Yeah, everything will be fine. Just like I said, let them know.

UM: I have the affidavit and shit. I'm gonna give them that. I mean just, isolated incident. You know, say all that shit.

RESNIK: Yeah, yeah for sure. That's fine.

UM: So hopefully they're just comfortable with me.

RESNIK: Nah, they will. They'll be fine. They'll be fine for sure.

UM: Beautiful.

RESNIK: Yeah.

UM: Dude, I'm just praying every day that fuckin Slippery Pete gets through again, dude.

RESNIK: Yeah, I know.

. . . .

*(approximately one minute later during the same communication)*

UM: I mean, I was like what do you think about all that?

Should I try to keep that going? Or are we just cold or what?

RESNIK: Yeah, yeah, yeah.

UM: Cause I've been in contact to do a couple of things.

RESNIK: No for sure.

UM: I wanted to get your word on it. Like should I invest a little bit to try to . . . get that going?

RESNIK: Yeah, yeah.

UM: Okay. Beautiful.

RESNIK: And just do how I said with the fifty mix people.

UM: Yeah. I got all your notes and everything and I'm gonna give that. I basically told Ceto 'listen, you were in there. This is your time to

shine, and like I'm not coming anywhere near that. So I mean, you can make it happen. This is the time. This is what you need to do. You know?

RESNIK: Yeah, exactly. You know what's up.

UM: And so I've been trying to motivate him, but you know how fucking he is. But I think he's starting to get broke, so I think he's starting to wise up and get a little more motivated.

RESNIK: Yeah, for sure. Right.

13. I later obtained subscriber and toll information for the telephone from which the UM was speaking with RESNIK, that is, (657) 244-7198, which revealed that it was activated on June 24, 2015, the day of RESNIK's arrest. I later made a "cold call" to the telephone number stored in RESNIK's telephone under the name "STANLEY," that is, (714) 317-8757, and spoke briefly to the person answering the telephone. The voice appeared to me to be the same as the voice on the MDC-LA calls at (657) 244-7198. For these reasons, in conjunction with the surveillance described below, I believe the person with whom RESNIK was having the conversation from MDC-LA was Joseph STANLEY.

14. In the context of this investigation, and the seizure of evidence described above, based on my training and experience, I believe RESNIK and STANLEY were discussing the following:

a. RESNIK was asking STANLEY if co-conspirators were using BlackBerry devices to communicate, when he asked "So

what's up with the Berries?" I believe STANLEY told RESNIK that he put the BlackBerry devices ("them") in storage the day RESNIK was arrested ("when the shit went down").

b. Furthermore, I believe RESNIK told STANLEY to use the same phones, but to get different phone numbers when RESNIK stated, "Just get new SIM cards and new numbers." Based on my training, experience, and knowledge of this investigation, I believe narcotics traffickers often use BlackBerry Devices to communicate BlackBerry PIN to BlackBerry PIN as they believe the communications are encrypted and cannot be intercepted by law enforcement.

c. STANLEY was telling RESNIK that their narcotics conspiracy activities were still ongoing when he said, "Everything's going steady and hopefully everything's going good with the homies and I could, you know, as it should be."

d. I believe when STANLEY told RESNIK that he was going to give the "homies" the affidavit for RESNIK's arrest warrant to show them that RESNIK's arrest was an "isolated incident." I believe STANLEY wanted the "homies" to believe that RESNIK's arrest did not implicate any other co-conspirators, so they could continue illicit narcotics activity without law enforcement detection.

e. I believe RESNIK told STANLEY to continue the narcotics activities when he said, "and just do how I said with the fifty mix people."

f. I believe when STANLEY replied - "Yeah. I got all your notes and everything[.] I basically told Ceto 'listen,

you were in there. This is your time to shine, and like I'm not coming anywhere near that. So I mean, you can make it happen. This is the time. This is what you need to do[,]'" - STANLEY was telling RESNIK that: (1) co-conspirators were following RESNIK's notes and instructions for the manufacture of drugs<sup>3</sup> and (2) STANLEY had motivated another co-conspirator ("Ceto") to take charge of the manufacturing component of the operation in RESNIK's absence.

g. Furthermore, I believe that when STANLEY and RESNIK discussed continued operations and STANLEY said, "[S]o hopefully they're just comfortable with me" and RESNIK responded "[t]hey'll be fine[,]'" they were discussing how other co-conspirators and partners would react to STANLEY handling the operations of the narcotics conspiracy in RESNIK's absence. I know that it's common for narcotics traffickers to carefully vet other traffickers with whom they will work with in order to prevent being infiltrated by a law enforcement informant.

**More Recent Observations Involving the Suspects and Subject Premises**

**1. October 2015 Observations**

15. Recent observations of RESNIK, STANLEY, SIMPSON, and BOWEN suggest that they and other co-conspirators continue to be

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<sup>3</sup> During the June 24, 2015 search warrant execution at RESNIK's warehouse unit, agents seized miscellaneous documents from the office of the warehouse. The documents included narcotics accounting ledgers, shipping receipts, and handwritten notes containing various ingredients and mixtures for the production of narcotic pills, including specific references to "A FEN," which I believe to have been a reference to pills containing acetyl-fentanyl.

involved in narcotics activity despite the relatively recent arrest of RESNIK, and that they are operating in a collective manner.<sup>4</sup> On October 29, 2015, Detective White informed me of the following surveillance that was conducted on October 28, 2015:

a. On October 28, 2015, at approximately 10:00 a.m., Huntington Beach Police Department ("HPD") Detectives established surveillance at SIMPSON's residence, **Subject Premises #4**.

b. At approximately 3:30 p.m., HPD Detective Jesse Crawley observed SIMPSON remove a suitcase, a box, a black nylon bag, and a grey backpack from his residence and place them in a Dodge Durango pick-up truck.

c. At approximately 4:05 p.m., Detective Oscar Garcia observed SIMPSON drive his Durango pick-up truck (on which a GPS tracking order was operating) to STANLEY's residence located at **Subject Premises #2**.

d. At approximately 4:12 p.m., Detective Garcia observed Christopher BOWEN, in a 2004 Ford Mustang (on which a GPS tracking order was operating) arrive at **Subject Premises #2**.

e. At approximately 4:37 p.m., Detective Garcia observed SIMPSON get into his Dodge Durango pick-up truck and depart the area.

f. At approximately 4:50 p.m., Detective Rodney

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<sup>4</sup> I have obtained orders for the placement and use of GPS devices on the vehicles of STANLEY, SIMPSON and BOWEN. Those orders are currently active and have been used to enhance visual surveillance. Some of the results obtained from the devices are described in greater detail below.

Besuzzi then observed SIMPSON drive the Durango pick-up to an AIM Mail Center located at 19051 Goldenwest Street, #106, Huntington Beach, California 92648. Detective Besuzzi observed SIMPSON walk into the AIM Mail Center empty-handed, walk back to his vehicle empty-handed, retrieve keys from his vehicle and walk back into the AIM Mail Center. Detective Besuzzi then observed SIMPSON walk out of the AIM Mail Center carrying a black package and place the package in the rear cargo area of his vehicle.

g. At approximately 9:30 p.m., Detective White observed BOWEN drive his Mustang to RESNIK's residence located at **Subject Premises #1**. Detective White observed BOWEN move a sealed brown box and several bags from his Mustang into RESNIK's residence.

h. At approximately 11:20 p.m., Detective Garcia observed BOWEN leave RESNIK's residence carrying the same box as observed before, now unsealed, and placed the box in his Mustang.

i. At approximately 11:55 p.m., Detective Rafael Mena observed BOWEN drive his Mustang to his residence, **Subject Premises #3**. Detective Mena observed BOWEN enter a gated parking garage and park his Mustang in space 2052.

j. Based on my training and experience, and my knowledge of this investigation, including discussions with surveillance officers, I believe SIMPSON took either narcotics or narcotics proceeds into STANLEY's residence, **Subject Premises #2**, and later picked up narcotic manufacturing materials from



the AIM Mail Center. I further believe BOWEN transported drug proceeds and possibly drugs to RESNIK's residence, **Subject Premises #1**. These activities suggest that the suspects are operating in a collective manner.

2. The November 12, 2015, Surveillance of BOWEN, STANLEY, and SIMPSON Pertaining to Subject Premises #2

16. On or about November 13, 2015, Detective White informed me of the following surveillance that was conducted on November 12, 2015:

a. On November 12, 2015, at approximately 11:30 a.m., HBPD Detectives established surveillance at STANLEY's residence, **Subject Premises #2**. Detective White observed BOWEN's Mustang parked approximately two houses north of STANLEY's residence. Detective White also observed STANLEY's TrailBlazer parked at the residence.

b. At approximately 1:00 p.m., Detective Garcia observed STANLEY and BOWEN exit **Subject Premises #2**, enter STANLEY's TrailBlazer, and depart the area.

c. At approximately 2:23 p.m., Detective White observed STANLEY's TrailBlazer arrive at **Subject Premises #2**. Detective White observed STANLEY and BOWEN exit the vehicle and walk into **Subject Premises #2**.

d. At approximately 2:52 p.m., Detective White observed SIMPSON arrive at **Subject Premises #2**, walk to the front door, and enter the residence.

e. At approximately 5:43 p.m., Detective Garcia observed SIMPSON, STANLEY, and BOWEN exit **Subject Premises #2**,

get into their respective cars, and depart the area in different directions.

f. At approximately 7:25 p.m., Detective White observed STANLEY arrive at **Subject Premises #2** in his TrailBlazer.

g. At approximately 8:15 p.m., Detective White observed SIMPSON arrive at **Subject Premises #2** carrying small, grocery-like bags to the front door of **Subject Premises #2**. Detective White then observed SIMPSON hand the bags to an unidentified male, walk back to his vehicle, retrieve a large box, and carry the box with both hands into **Subject Premises #2**.

17. Based on my training, experience and prior incidents during this investigation, I strongly suspect that, since the arrest of RESNIK, STANLEY has been operating a drug and drug storage proceeds location at his residence at **Subject Premises #2**.

3. The January 13, 2016, Seizure of Approximately 5,000 "Norco" Pills containing Aceytl-fentanyl, Ecstasy and Xanax Pills

18. On or about January 14, 2016, Detective White informed me of the following surveillance that was conducted on January 13, 2016:

a. On January 13, 2015, at approximately 7:30 p.m., HBPD Detectives established surveillance at **Subject Premises #2**.

b. At approximately 7:55 p.m., Detective White observed SIMPSON and BOWEN exit **Subject Premises #2** and walk to the rear cargo area of SIMPSON's Durango. SIMPSON opened the

rear cargo hatch and both SIMPSON and BOWEN looked inside of a cardboard box in the cargo area of the Durango. BOWEN picked up the box and carried it to his Mustang. Detective White observed the box to be approximately 2'x 1' in size and appeared to be weighted with contents. BOWEN placed the box in the front passenger seat of his Mustang. SIMPSON then removed a yellow packaging envelope approximately 12"x12" in size from the rear cargo area of his Durango. SIMPSON carried the envelope to BOWEN's Mustang and handed the envelope to BOWEN. BOWEN then placed the envelope into the front passenger seat of the Mustang. BOWEN walked back towards **Subject Premises #2** and entered the front door. Simultaneously, SIMPSON entered his Durango and left **Subject Premises #2**.

c. At approximately 8:05 p.m., Detective Crawley observed SIMPSON arrive at his residence, **Subject Premises #4**, and enter the residence through his garage door.

d. At approximately 8:48 p.m., Detective Crawley observed SIMPSON exit the garage of **Subject Premises #4**, get into his Durango, and depart the area.

e. At approximately 8:52 p.m., Detective Quidort observed SIMPSON arrive in the area of Pine Circle, Fountain Valley, California. SIMPSON parked mid-block, along the east side of the street and kept his vehicle running. Detective Quidort observed SIMPSON walk away from a residence on the east side of the street and walk back to his Durango and depart the area.

f. At approximately 9:15 p.m., Detective White observed SIMPSON arrive at his residence, **Subject Premises #4**. SIMPSON exited his vehicle and walked to the rear cargo area taking out a container that appeared to be weighted with contents. SIMPSON then placed the container on the floor of the garage and closed the garage door with SIMPSON inside of the residence.

g. At approximately 9:36 p.m., Detective White observed a black Mustang arrive at **Subject Premises #4** and park in the driveway. An unidentified male wearing a backpack walked into the open garage of **Subject Premises #4** with the garage door closing behind him.

h. At approximately 10:57 p.m., Detective White observed SIMPSON exit the garage of **Subject Premises #4** and get into his Durango.

i. At approximately 11:10 p.m., Detective White observed SIMPSON arrive at **Subject Premises #2**. Detective White also observed RESNIK's truck, a Toyota Tundra bearing California license plate 28767M1, in which he has previously been observed, parked in the driveway of **Subject Premises #2**. BOWEN's Mustang was also present. Detective White then observed SIMPSON walk into **Subject Premises #2** empty-handed.

j. At approximately 11:16 p.m., Detective White observed BOWEN and SIMPSON exit **Subject Premises #2**. SIMPSON retrieved a long cable, similar to computer cable, from the front passenger seat of his Durango. BOWEN retrieved an unknown

item from RESNIK's truck. SIMPSON and BOWEN then both walked back into **Subject Premises #2** closing the door behind them.

k. At approximately 11:30 p.m., Detective White observed RESNIK and SIMPSON exit **Subject Premises #2**. SIMPSON entered his Durango. RESNIK retrieved an unknown item from his Tundra and walked back into **Subject Premises #2**. SIMPSON was then observed leaving the area in his Durango.

l. At approximately 11:43 p.m., Detective Quidort observed SIMPSON arrive in the area of Apple Street and Zinnia Avenue in Fountain Valley, California. SIMPSON parked near a black Lexus bearing California license plate 4XMX931. Detective Quidort observed an unidentified male exit the Lexus and enter the front passenger seat of SIMPSON's Durango. SIMPSON and the unidentified male drove around the block in the Durango and returned back to the Lexus. The unidentified male exited SIMPSON's vehicle and got into the driver's side of the Lexus. At this time, both the Durango and the Lexus departed the area.

m. At approximately 12:07 a.m., Detectives observed the Lexus stop at a Chevron gas station located at 8000 E. Santa Ana Canyon Road, Anaheim Hills, California. At that time, Detectives made contact with the driver of the vehicle, Timothy Werley, and identified the passenger of the vehicle as Amy Payan.

n. Detective White asked Werley to exit the Lexus and he complied. Detective White asked Werley if he had anything illegal on his person or in his vehicle and he answered, "Yes." Werley explained that he had "Norcos" in his

vehicle that he had just purchased. Based on his training and experience in the field of narcotics, Detective White knows that "Norcos" are a prescription controlled substance used to treat pain. Legitimately manufactured and distributed, they would contain hydrocodone and acetaminophen.

o. Detective White asked Werley how many pills were in his vehicle and he replied, "5,000." Werley consented to a search of his person. During the search of Werley's person, Detective White located two plastic bags in Werley's left, front sweatshirt pocket. One of the bags contained multiple yellow pills which, when later tested, proved to be approximately 34.5 grams of Methylenedioxymethamphetamine (MDMA, street name "Ecstasy"); the other bags contained multiple white, rectangular pills which, when later tested, proved to be approximately 105.9 grams of a substance containing alprazolam (typical brand name "Xanax"). Detective White took custody of both bags. Werley was also in possession of approximately \$1,600 in United States currency.

p. Detective Crawley recovered a black plastic shopping bag from the front passenger seat area inside Werley's vehicle. Inside the bag was a brown paper bag containing four clear plastic sandwich bags with several thousand pills. Each bag contained multiple white oblong-shaped pills which, when later tested, proved to be approximately 1,753 grams of a substance containing acetyl-fentanyl.

q. Werley told Detective White that he had purchased the narcotics from a group that lives in the Huntington Beach

area. Werley stated he was introduced to the group through a friend a couple months ago. Initially Werley said that he had purchased narcotics from this group six or seven times since meeting them; however, he further explained that he purchases narcotics from them every "couple days."

r. Werley said that he has contact with two different suppliers from the DTO that he calls or texts when he wants to purchase more narcotics. He identified these suppliers as "Manuel" and "Kid." Werley said that "Manuel" drives a red Ford Mustang and lives in "North Hollywood." Werley said that "Kid" drives a "blue SUV" and lives somewhere in Huntington Beach. Werley admitted that he had met with "Kid" earlier this evening and purchased the narcotics that detectives had recovered from his vehicle.

s. Werley admitted that he purchased the narcotics with the intent to sell them. Werley said that he had paid "\$4,000" for "5,000 pills." Werley said that he sells a minimum of 1,000 pills to his buyers, which he referred to as "a boat." WERLEY said that he would make approximately \$2,000 in profit selling the pills that he purchased. Werley said that his last purchase from the group was Monday afternoon. At that time, Werley said that he met "Manuel" in Baldwin Park, and purchased the same amount.

t. Werley explained that when he contacts members of the DTO to purchase narcotics, he is provided with a location to meet them to obtain the narcotics. He stated the locations range from Huntington Beach to Baldwin Park. Werley stated,

that evening, that he was given an address near Apple Street and Zinnia Avenue in Fountain Valley. When Werley arrived, Werley sent a message to "Kid," who subsequently showed up a short time later with the narcotics. Werley showed Detective White the text message communication between him and "Kid" that showed the location to meet, "9861 Zinnia Ave in the City of Fountain Valley," California, from cell phone number 714-913-2583.

u. Werley provided Detective White with several telephone numbers that he uses to contact suppliers of the DTO. One of the numbers belonged to "Megan," who he said "runs the show." He said that he has talked to her on the phone several times, but has never met her. "Megan" will often tell him where to meet the supplier. The number provided for Megan was 562-233-7088. Based on my knowledge of this investigation and this interview with Werley, I believe "Megan" is Megan Foster. Based on Werley's description and information provided, including the vehicle descriptions and visual surveillance, that "Manuel" is BOWEN. Based on this information, I believe "Kid" is SIMPSON.

4. The January 26 and 27, 2016, Surveillance of BOWEN and SIMPSON Pertaining to Subject Premises #1, #2, #3 and #5

19. On January 26, 2016, at approximately 10:00 a.m., Detectives White and Quidort established surveillance at RESNIK's residence, **Subject Premises #1**. Detective White observed BOWEN's Mustang parked in the guest parking lot of the location.



a. At approximately 10:05 a.m., Detective White observed BOWEN depart **Subject Premises #1** in the Mustang.

b. At approximately 10:43 a.m., Detective White observed BOWEN arrive at his residence, **Subject Premises #3**, and park his Mustang in the alley to the rear of his residence.

c. At approximately 11:35 p.m., Detective White observed BOWEN walk to his Mustang and drive the vehicle around the building to resident parking. BOWEN then entered the parking garage and parked his Mustang in his assigned parking stall at **Subject Premises #3**.

d. Per GPS tracking information, at approximately 12:01 p.m., his Mustang arrived in the near proximity of STANLEY's residence, **Subject Premises #2**.

e. Per GPS tracking information, at approximately 1:44 p.m., his Mustang arrived at **Subject Premises #5**, where the vehicle remained for approximately eighteen hours.

20. On January 27, 2016, at approximately 5:00 p.m., HBPD Detectives established surveillance at **Subject Premises #5**. Detective Crawley observed SIMPSON's Dodge Durango backed into the driveway with the driveway gate closed. Detective Crawley also observed a surveillance camera above the front door, affixed to a palm tree.

a. At approximately 5:40 p.m., Detective Crawley observed a light turn on inside of **Subject Premises #5**.

b. At approximately 5:42 p.m., Detective Crawley observed a light turn off inside of **Subject Premises #5**.

c. At approximately 6:09 p.m., Detective Crawley observed SIMPSON exit the south door of **Subject Premises #5** and open the rear cargo hatch of his Durango. SIMPSON then loaded items into the rear cargo area of his Durango. SIMPSON then walked to the driveway gate and manually opened the gate. SIMPSON then pulled his Durango out of the driveway and got out of his Durango and manually closed the driveway gate of **Subject Premises #5**.

d. At approximately 6:11 p.m., Detective Crawley observed SIMPSON depart **Subject Premises #5** in his Durango.

e. At approximately 7:08 p.m., Detective Besuzzi observed SIMPSON park his Durango in the guest parking stall near RESNIK's residence, **Subject Premises #1**, with flashers on. Detective White then observed SIMPSON near the rear cargo area of his Durango shuffle through boxes containing paper bags. SIMPSON then removed a white paper bag and walked to, and entered, **Subject Premises #1**.

f. At approximately 7:15 p.m., Detective White observed SIMPSON exit **Subject Premises #1** carrying two orange duffel bags, walk to the Durango, and place the two bags in the rear passenger seat. SIMPSON then departed **Subject Premises #1** in his Durango.

g. At approximately 7:33 p.m., Detective Mena observed SIMPSON arrive at STANLEY's residence, **Subject Premises #2**, park in front of the residence, remove the two orange duffel bags from the rear passenger seat of his Durango, and carry the bags to the front door. SIMPSON then used a key to open the

front door and walked into **Subject Premises #2** closing the front door behind him. Detective White observed the STANLEY's Chevrolet TrailBlazer at the residence.

21. Based on my training, experience, knowledge of this investigation, and the above mentioned surveillances, I believe SIMPSON and BOWEN used the Durango and Mustang to facilitate their narcotics manufacturing and distribution activities. I believe BOWEN was likely transporting narcotics or narcotics related paraphernalia to and from RESNIK's residence, **Subject Premises #1**, to **Subject Premises #5**, believed to be this organization's drug manufacturing and storage location. Furthermore, I believe that the orange duffel bags SIMPSON was observed transporting from RESNIK's residence, **Subject Premises #1**, to STANLEY's residence, **Subject Premises #2**, are likely to be narcotics, narcotics proceeds, and paraphernalia used in the manufacturing narcotics.

5. Recent Imports from China by RESNIK, SIMPSON and BOWEN

22. Since RESNIK's arrest on June 24, 2015, and his subsequent release to further the investigation, RESNIK and his co-conspirators have continued receiving various shipments in from China. I strongly believe based on my knowledge of this investigation, wire transfers of co-conspirators, as well as having spoken with other agents across the United States whose investigations are directly linked with this investigation, that RESNIK's acetyl-fentanyl source of supply is located in China. I and other investigators have discovered the RESNIK and his co-conspirators, namely BOWEN and SIMPSON, utilize multiple Post

Office boxes at several locations for the purpose of receiving shipments. I believe the use of multiple post office boxes is an effort for RESNIK and his co-conspirators to thwart law enforcement and to prevent inspection by Customs and Border Protection agents. Furthermore, I believe RESNIK and his-conspirators often times declare the shipments as something other than what they truly are to prevent the shipments from being flagged for inspection, as the Pill Press that was discussed previously in this affidavit was declared as a "Hole Puncher." Below is a table derived from United States Customs and Homeland Security recent shipment records of items sent from China to persons and/or addresses relevant to this affidavit. All of the below shipments were from China. I am aware that China is a manufacturer of a variety of goods sent to the United States, and it is possible that some of these shipments contained lawful and innocent items. However, the regularity and frequency with which RESNIK and his associates continue to receive shipments from China is relevant, as is the fact that they receive shipments to post office boxes. SIMPSON and BOWEN appear to have multiple post office boxes at which they are receiving shipments. In addition, some of items listed below, which are identified by their declared contents, plainly could be used in the manufacture of unlawful drugs including the grain mill mixing machine and laboratory glassware. I am aware, based on my training and experience, that lactose is often used as an additive to unlawful drug manufacturing. Sodium hypophosphite

can be used in the manufacture of methamphetamine and other drugs.

1/19/2016 <sup>5</sup>	Dylan Simpson 19051 Golden West St, Ste 106, Huntington Beach	Sodium Sulphate
11/19/2015	Dylan Simpson, 16027 Brookhurst St Suite I Fountain Valley, Ca 92708	Grain Mill Mixing Machine
1/27/2016	Gary Resnik 5995 E. Pacific Coast Hwy. Apt 1 Long Beach, CA 90803 ( <b>Subject Premises #1</b> )	Plastic (No description)
1/28/2016	Gary Resnik 5995 E. Pacific Coast Hwy. Apt 1 Long Beach, CA 90803 ( <b>Subject Premises #1</b> )	Plastic (No description)
1/28/2016	Gary Resnik 5995 E. Pacific Coast Hwy. Apt 1 Long Beach, CA 90803	CVGOV2 Hardness Tester
1/28/2016	Dylan Simpson 16027 Brookhurst St. Suite I Fountain Valley, Ca 92708	Mold Set
1/28/2016	Christopher Bowen, Ship 4 U Express 505 S. Vermont Ave #B Los Angeles, CA 90020	Package
1/28/2016	Christopher Bowen ACE One Stop Mail Plus 106 Judge John Aiso St. #5 106 ½ Judge John Aiso St. Los Angeles, Ca 90012	accessories
2/16/2016	Christopher Bowen Mail Monster 941 S. Vermont Ave. Suite 101, Los Angeles, CA 90006	kids toys
2/26/2016	Linda Sortillon <sup>6</sup> 16356 Filbert Street, Fountain Valley, CA 92708 ( <b>Subject Premises #4</b> )	Bookmarks
2/25/2016	Christopher Bowen 941 S. Vermont Ave. Suite 101 Los Angeles, CA 90006	Sodium Hypophosphite
2/25/2016	Gary Resnik 5995 E. Pacific Coast Hwy. Apt 1 Long Beach, CA 90803 ( <b>Subject Premises #1</b> )	Laboratory Glassware
2/28/2016	Gary Resnik 5995 E. Pacific Coast Hwy. Apt 1	1000ml 2 neck round bottom flask

<sup>5</sup> These are the approximate dates on which I was notified of the United States in-bound shipments. The actual dates the goods entered the United States can vary, but these date are accurate approximations of the entry and delivery.

<sup>6</sup> Based on review of documents associated with **Subject Premises #4** and SIMPSON, I believe Linda Sortillon is likely SIMPSON's mother.

Long Beach, CA 90803 (Subject Premises #1)
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6. GPS Tracking of Vehicles used by STANLEY, SIMPSON and BOWEN to and from the Subject Premises

23. Over the course of this investigation, I have sought GPS tracking warrants for the following vehicles:

a. a 2003 Dodge Durango, blue in color, bearing California license plate 5CFY547, listed registered owner of Dylan Michael Simpson (SIMPSON) at 16356 Filbert Street, Fountain Valley, California 92708 (Subject Premises #4) and observed to be driven by SIMPSON and regularly present at Subject Premises #4;

b. a 2004 Ford Mustang, red in color, bearing California license plate 5FMY597, listed registered owner of Sandra I Alarcon (BOWEN's mother) at 6957 Rivertrails Drive, Mira Loma, California 91752 and observed being driven by BOWEN and regularly seen to be present at Subject Premises #3; and,

c. a 2007 Chevrolet TrailBlazer, white in color, bearing California license plate 6BJN661, listed registered owner of Jennifer Robin Degenhardt (believed to be STANLEY's wife) at 19872 Inverness Lane, Huntington Beach, California 92646 and observed being driven by STANLEY and regularly present at Subject Premises #2.

24. The following search warrants were signed for the above listed individuals:

a. On October 30, 2015, the Honorable Andrew J. Wistrich, United States Magistrate Judge, signed warrants 15-

2088M and 2089M authorizing the initial use of tracking devices on the BOWEN's Mustang and SIMPSON's Durango. On January 7, 2016 and February 22, 2016, orders of renewal for the use and monitoring of the tracking devices on each of the vehicles were approved. The devices are continuing to be monitored as of this writing.

b. On February 9, 2016, the Honorable Frederick M. Mumm, United States Magistrate Judge, signed warrant 16-0261M authorizing the initial use of a tracking device on STANLEY's TrailBlazer. The device is continuing to be monitored as of this writing.

25. In the time period February 2 through February 25, 2106, the information derived from the GPS tracking device on the Durango (driven by SIMPSON), as well as visual surveillance, some of which is described within this affidavit, has shown that the vehicle operated by SIMPSON has been present at **Subject Premises #1** (RESNIK's residence) on approximately 11 occasions (most recently on February 20, 2016); at **Subject Premises #2** (STANLEY's residence) on approximately 49 occasions (most recently on February 24, 2016); at **Subject Premises #4** (SIMPSON's own residence) on approximately 111 occasions (most recently on February 25, 2016); at **Subject Premises #5** (the suspected manufacturing and storage location) on approximately 13 occasions (most recently on February 25, 2016); and at **Subject Premises #6** (the storage facility) on approximately 2 occasions (most recently being on February 23, 2016).

26. In the time period February 2 through February 25, 2016, the information derived from the GPS tracking device on the Mustang (driven by BOWEN), as well as visual surveillance, some of which is described within this affidavit, has shown that the vehicle operated by BOWEN has been present at **Subject Premises #1** on approximately 3 occasions (most recently on February 12, 2016); at **Subject Premises #2** on approximately 6 occasions (most recently on February 20, 2016); at **Subject Premises #3** (BOWEN's own residence) on approximately 22 occasions (most recently on February 24, 2016); and at **Subject Premises #5** (the suspected manufacturing and storage location) on approximately 19 occasions (most recently on February 25, 2016).

27. In the time period February 9 through February 25, 2016, the information derived from the GPS tracking device on the TrailBlazer (driven by STANLEY), as well as visual surveillance, some of which is described within this affidavit, has shown that the vehicle operated by STANLEY has been present at **Subject Premises #2** (STANLEY's own residence) on approximately 18 occasions (most recently on February 24, 2016) and at **Subject Premises #4** on approximately 3 occasions (most recently on February 21, 2016).

28. These on-going interactions between RESNIK, STANLEY, BOWEN and SIMPSON show that these persons are continuing to conduct meetings and likely deliveries with each other.



7. Subject Premises #5 as a Drug Manufacturing and Storage Location

29. Probably as a result of the search warrant served on June 24, 2015 at the warehouse at 2621 E. 67<sup>th</sup> Street, Unit H, Long Beach, California), it appears that the group has relocated at least some drug manufacturing and storage activities to the single-family residence that is designated **Subject Premises #5**. In addition to the facts described herein concerning the activities in which the group is engaging, I base this belief on several other factors. Since approximately December 15, 2015, a hidden surveillance camera has been focused on the exterior of **Subject Premises #5**. Because of technical limitations on the placement of the camera, however, it does not provide detail on the facial features and objects being carried in and out of **Subject Premises #5**. I generally am able to observe during daytime hours when persons are coming and going from **Subject Premises #5**. There does not appear to be anyone staying overnight at **Subject Premises #5**. I have above, based on GPS information, set-forth visits by SIMPSON and BOWEN to **Subject Premises #5**. The details of these visits are also important. BOWEN goes to **Subject Premises #5** with greater regularity than SIMPSON. When he goes, he often stays for several hours and sometimes into the early morning hours. For example, on February 8, BOWEN's vehicle arrived at **Subject Premises #5** at 10:56 p.m. and left at 12:28 a.m. the next day; on February 12, he arrived at 5:14 p.m. and left at 9:35 p.m; on February 24, he arrived at 10:02 a.m. and stayed until 7:59 p.m. Conversely,

SIMPSON usually stays for much shorter times. On February 4, 2016, he arrived at 8:55 p.m. and left a few minutes later, at 9:16 p.m; on February 12, he arrived at 9:08 p.m. and left at 9:34 p.m; on February 20, 2016, he arrived at 11:05 p.m. and left at 11:16 p.m. Based on my training and experience, and my knowledge of this experience, these visits are consistent with BOWEN being a person who is conducting substantial manufacturing and packaging at **Subject Premises #5** and SIMPSON as a courier to and from **Subject Premises #5**. Notably, SIMPSON is the renter for the storage space, **Subject Premises #6**, though it is visited with much less frequency than **Subject Premises #5**. It may be a longer term storage location for their unlawful activities.

8. Further Information for the Subject Premises

30. With respect to **Subject Premises #1**, as noted above, this property was searched on June 24, 2015, and found to be the residence of RESNIK. The table above shows that, as recently as February 25, 2016, RESNIK received was appeared to be laboratory glassware at **Subject Premises #1**. On June 19, 2015, administrative subpoenas were served on Pathways at Bixby Village, the apartment complex of **Subject Premises #1**. Per the lease agreement, Gary RESNIK signed a lease for **Subject Premises #1** for a period of twelve months beginning March 18, 2015, and terminating March 17, 2016. I am aware, however, that many one-year lease agreements subsequently become month-to-month leases. Through surveillance, I have observed nothing indicating that RESNIK is planning on vacating **Subject Premises #1**.

31. On March 1, 2016, Financial Investigator Richard Malone provided me with Bank of America statements for both Joseph STANLEY and Dylan SIMPSON. STANLEY's December 16, 2015, to January 13, 2016, Bank of America statement revealed two open accounts and provided an address for STANLEY at 16692 Irby Lane, Huntington Beach, California 92647 (**Subject Premises #2**). On or about January 26, 2016, I received documents from Southern California Gas Company revealing that Joseph STANLEY turned on gas utilities at 16692 Irby Lane, Huntington Beach, California 92647 (**Subject Premises #2**), on September 11, 2015. Per the documents received, the account is still active.

32. On or about November 4, 2015, I obtained the Lease Agreement for **Subject Premises #3**, which revealed the following: Paul Martinez and Sandra Alarcon signed a one year lease agreement with Hanover South Park on April 23, 2015, to lease Apartment #248, garage/parking #2052 at a legal address of 939 S. Hill Street, Los Angeles, California 90015, at \$3,490.00 a month. Per the lease, there was a \$2,695.00 security deposit paid. Per Yardi Resident Screening, applicant Sandra I Alarcon, also known as Sandra Bowen Alarcon, has a date of birth of November 26, 1963, and provides a current address of 6957 Rivertrails Drive, Eastvale, California 91752. Later in the screening application, Sandra Alarcon provides a primary address of 20351 Tidepool Circle, Apartment 104, Huntington Beach, California 92646. An open source search reveals Christopher BOWEN is associated with both 6957 Rivertrails Drive, Eastvale, California 91752, and 20351 Tidepool Circle, Apartment 104,

Huntington Beach, California 92646. Per Yardi Resident Screening, applicant Paul L. Martinez has a date of birth of November 2, 1986, and provides a current address of 950 South Flower Street, Apartment 817, Los Angeles, California 90015.

Based on my knowledge of this investigation, tracker information obtained, as well as visual surveillance, I believe Sandra Alarcon is BOWEN's mother or close relative and signed the lease agreement for BOWEN.

33. Also on March 1, 2016, Financial Investigator Richard Malone provided me with Bank of America statements for SIMPSON. SIMPSON's June 12, 2015, to July 14, 2015, Bank of America statement revealed an open account and provided an address for SIMPSON at 16356 Filbert Street, Fountain Valley, California 92708 (**Subject Premises #4**).

34. With regard to **Subject Premises #5**, as described above, I believe this to be a drug manufacturing and storage location used by SIMPSON and BOWEN in furtherance of the drug distribution activities of this group. A review of utilities indicates that gas is not being provided to the premises, which seems atypical for the ordinary homeowner. Beginning on October 15, 2015, the electricity customer is "Michael Silliman."

35. For the storage location that is **Subject Premises #6**, on or about January 23, 2016, I obtained the lease/rental agreement for **Subject Premises #6**, which revealed the following information: The lease/rental agreement was executed on June 24, 2015, between Dylan SIMPSON and the self-storage facility located at 17300 Newhope Street, Fountain Valley, California

92708. This is in the same time period that RESNIK was arrested as stated previously in the affidavit. The following is the occupant information as obtained from the NEW ACCOUNT RECEIPT with a date and time stamp of 06/24/2015 5:56:59 p.m.: Customer information - Dylan SIMPSON; 16356 Filbert Street, Fountain Valley, California 92708 (i.e., **Subject Premises #4**); Phone - 714-913-3586; Email Address - sukdeez1@yahoo.com; Account Number - 20819153. The Activity Log for the premises ranging from June 24, 2015 through January 23, 2016, showed SIMPSON accessing the facility on multiple occasions. For example, SIMPSON entered **Subject Premises #6** on approximately 3 occasions on June 24, 2015, approximately on 7 occasions on October 13, 2015; and approximately on 2 occasions on January 13, 2016. As stated above, SIMPSON has continued to enter **Subject Premises #6** throughout February based on GPS information. Based on my training and experience, and my knowledge of this investigation, I strongly suspect that **Subject Premises #6** is being used as a storage location by SIMPSON for equipment and chemicals used in the manufacturing of illegal narcotics, and possibly illegal narcotics themselves.

**Training and Experience on Digital Devices**

36. As used herein, the term "digital device" includes any electronic system or device capable of storing or processing data in digital form, including central processing units; desktop, laptop, notebook, and tablet computers; personal digital assistants; wireless communication devices, such as telephone paging devices, beepers, mobile telephones, and smart

phones; digital cameras; peripheral input/output devices, such as keyboards, printers, scanners, plotters, monitors, and drives intended for removable media; related communications devices, such as modems, routers, cables, and connections; storage media, such as hard disk drives, floppy disks, memory cards, optical disks, and magnetic tapes used to store digital data (excluding analog tapes such as VHS); and security devices. Based on my knowledge, training, and experience, as well as information related to me by agents and others involved in the forensic examination of digital devices, I know that data in digital form can be stored on a variety of digital devices and that during the search of a premises it is not always possible to search digital devices for digital data for a number of reasons, including the following:

37. Searching digital devices can be a highly technical process that requires specific expertise and specialized equipment. There are so many types of digital devices and software programs in use today that it is impossible to bring to the search site all of the necessary technical manuals and specialized equipment necessary to conduct a thorough search. In addition, it may be necessary to consult with specially trained personnel who have specific expertise in the types of digital devices, operating systems, or software applications that are being searched.

38. Digital data is particularly vulnerable to inadvertent or intentional modification or destruction. Searching digital devices can require the use of precise, scientific procedures

that are designed to maintain the integrity of digital data and to recover "hidden," erased, compressed, encrypted, or password-protected data. As a result, a controlled environment, such as a law enforcement laboratory or similar facility, is essential to conducting a complete and accurate analysis of data stored on digital devices.

39. The volume of data stored on many digital devices will typically be so large that it will be highly impractical to search for data during the physical search of the premises. A single megabyte of storage space is the equivalent of 500 double-spaced pages of text. A single gigabyte of storage space, or 1,000 megabytes, is the equivalent of 500,000 double-spaced pages of text. Storage devices capable of storing 500 or more gigabytes are now commonplace. Consequently, just one device might contain the equivalent of 250 million pages of data, which, if printed out, would completely fill three 35' x 35' x 10' rooms to the ceiling. Further, a 500 gigabyte drive could contain as many as approximately 450 full run movies or 450,000 songs.

40. Electronic files or remnants of such files can be recovered months or even years after they have been downloaded onto a hard drive, deleted, or viewed via the Internet. Electronic files saved to a hard drive can be stored for years with little or no cost. Even when such files have been deleted, they can be recovered months or years later using readily-available forensics tools. Normally, when a person deletes a file on a computer, the data contained in the file does not

actually disappear; rather, that data remains on the hard drive until it is overwritten by new data. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space, i.e., space on a hard drive that is not allocated to an active file or that is unused after a file has been allocated to a set block of storage space, for long periods of time before they are overwritten. In addition, a computer's operating system may also keep a record of deleted data in a swap or recovery file. Similarly, files that have been viewed on the Internet are often automatically downloaded into a temporary directory or cache. The browser typically maintains a fixed amount of hard drive space devoted to these files, and the files are only overwritten as they are replaced with more recently downloaded or viewed content. Thus, the ability to retrieve residue of an electronic file from a hard drive depends less on when the file was downloaded or viewed than on a particular user's operating system, storage capacity, and computer habits. Recovery of residue of electronic files from a hard drive requires specialized tools and a controlled laboratory environment. Recovery also can require substantial time.

41. Although some of the records called for by this warrant might be found in the form of user-generated documents (such as word processing, picture, and movie files), digital devices can contain other forms of electronic evidence as well. In particular, records of how a digital device has been used, what it has been used for, who has used it, and who has been responsible for creating or maintaining records, documents,



programs, applications and materials contained on the digital devices are, as described further in the attachments, called for by this warrant. Those records will not always be found in digital data that is neatly segregable from the hard drive image as a whole. Digital data on the hard drive not currently associated with any file can provide evidence of a file that was once on the hard drive but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave digital data on the hard drive that show what tasks and processes on the computer were recently used. Web browsers, e-mail programs, and chat programs often store configuration data on the hard drive that can reveal information such as online nicknames and passwords. Operating systems can record additional data, such as the attachment of peripherals, the attachment of USB flash storage devices, and the times the computer was in use. Computer file systems can record data about the dates files were created and the sequence in which they were created. This data can be evidence of a crime, indicate the identity of the user of the digital device, or point toward the existence of evidence in other locations. Recovery of this data requires specialized tools and a controlled laboratory environment, and also can require substantial time.

42. Further, evidence of how a digital device has been used, what it has been used for, and who has used it, may be the absence of particular data on a digital device. For example, to

rebut a claim that the owner of a digital device was not responsible for a particular use because the device was being controlled remotely by malicious software, it may be necessary to show that malicious software that allows someone else to control the digital device remotely is not present on the digital device. Evidence of the absence of particular data on a digital device is not segregable from the digital device. Analysis of the digital device as a whole to demonstrate the absence of particular data requires specialized tools and a controlled laboratory environment, and can require substantial time.

#### CONCLUSION

43. Based on the facts set forth herein, I submit that probable cause exists to believe that Gary RESNIK, Joseph STANLEY, Christopher BOWEN and Dylan SIMPSON, and others known and unknown, have committed, are committing, and will commit the above-listed offenses, and that there is sufficient evidence to support probable cause for the issuance of a criminal complaint

and arrest warrants for these named persons. In addition, and also based on the facts set forth herein, I believe that probable cause exists to search each of the Subject Premises #1

through #6, as described in Attachment A to each search warrant, for those items described in Attachment B to each search warrant, and the seizure of those items.

LS  
Lindsey Bellomy  
Special Agent, DEA

Sworn and subscribed to before me  
on this 8<sup>th</sup> day of March 2016

**CHARLES F. EICK**

HONORABLE CHARLES F. EICK  
UNITED STATES MAGISTRATE JUDGE