

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Central District of Illinois

United States of America
v.

Case No.

18-MJ- 7104

STEPHAN CAAMANO

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 date(s) of September 2016 to May 2018 in the county of Champaign in the Central District of Illinois, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. §§ 841(a)(1) and 846

Distribution of a Controlled Substance and Attempt to Distribute a Controlled Substance

This criminal complaint is based on these facts:

Please see attached affidavit.

Continued on the attached sheet.

s/Todd M. Emery

Complainant's signature

Todd M. Emery, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

s/Eric I. Long

Date: 05/29/2018

Judge's signature

City and state: Urbana, Illinois

Eric I. Long, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Todd M. Emery, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Drug Enforcement Administration and have been so employed for more than seven years. I have had extensive training in the investigation of drug related crimes and the enforcement of federal laws concerning controlled substances as found in Title 21 of the United States Code. Currently, I am assigned to the DEA's Springfield, Illinois, Resident Office (SRO). I have investigated illicit controlled substance trafficking, to include the importation, distribution, manufacture and cultivation of illegal substances. I have personally conducted or assisted in numerous investigations of state and federal criminal violations involving the illegal trafficking of narcotics and related crimes. I have received specialized training in various aspects of narcotics investigations, which includes but is not limited to interviewing defendants and witnesses, surveillance techniques, and money laundering. Prior to my assignment at SRO, I served as Technical Operations Agent to the DEA Imperial, California, District Office for approximately five years where I assisted agents in conducting cyber investigations, authored several search warrants to technical enterprises such as Microsoft and Facebook, and handled operations for that office's wire room to include assisting in routing data packets such as email content to approved systems for agent investigations. I also served two years at the DEA's Office of Special Intelligence, where I learned skillsets involving Virtual Private Networking (VPN), IP configuration, and basic programming in a few computer coding languages.

I have helped prepare numerous complaint and search warrant affidavits, participated in the execution of search warrants, and testified at criminal trials during my participation in drug investigations.

2. I make this affidavit in support of a criminal complaint and arrest warrant for STEPHAN CAAMANO. As will be shown below, there is probable cause to believe that CAAMANO engaged in Distribution of a Controlled Substance and Attempt to Distribute a Controlled Substance in violation of 21 U.S.C. §§ 841(a)(1) and 846.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested arrest warrant and does not set forth all of my knowledge about this matter.

4. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that CAAMANO committed violation of 21 U.S.C. § 841, 846, Distribution of a Controlled Substance and Attempt to Distribute a Controlled Substance. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

PROBABLE CAUSE

Initiation of Investigation

5. In December 2017, agents began investigating a target, Stephan CAAMANO, for manufacturing controlled substance with tablet press machines purchased online from various companies based in China. Customs and Border Protection agents had contacted the Drug Enforcement Administration's Springfield, Illinois, Resident Office pertaining to several imported items seized by CBP that were destined for delivery to CAAMANO at various addresses associated with CAAMANO in California and in the Champaign, Illinois-area between September 2016 and July 2017. The items included but were not limited to a turbine wheel box pill press machine and pill press machine parts and alprazolam, a Schedule IV controlled substance.

Surveillance of CAAMANO and Package Drop

6. On March 8, 2018, agents conducted surveillance of Stephan CAAMANO at his residence, 1510 Glenshire Drive, Champaign, Illinois. At approximately 10:00 a.m., agents observed CAAMANO¹ depart the residence traveling eastbound on Kirby Avenue in a 2017 Toyota RAV4, blue in color, bearing Illinois License Plate AM93634, and assigned vehicle identification number 2T3BFREV5HW647548. That vehicle was and is currently registered to and known to be driven by CAAMANO. Agents observed CAAMANO arrive in the RAV4 at a United States Postal Service drop box located near

¹ Law enforcement agents had obtained a California Driver's License photograph of Stephan CAAMANO.

2012 Round Barn Road, Champaign, Illinois. Agents then observed and video recorded CAAMANO as he removed yellow manila envelopes from the rear passenger area of his vehicle multiple times and deposited said manila envelopes into the USPS drop box.

7. That same morning, while maintaining surveillance of the drop box, agents contacted the United States Postal Inspection Service so that they could visually inspect the manila envelopes deposited in the USPS drop box by CAAMANO. USPIS sent a mail carrier to open the drop box near 2012 Round Barn Road, Champaign, Illinois, and to collect all mail from inside the drop box.

8. Later that morning, at approximately 11:15 a.m., agents met with the USPS mail carrier at the Round Barn Road location. Prior to the mail carrier's arrival, agents confirmed via surveillance that no other individuals had gained access to the USPS drop box or tampered with its contents. With assistance from the USPS mail carrier, agents were able to visually inspect the contents of the drop box and observed 33 yellow manila envelopes matching in appearance the yellow manila envelopes agents previously saw CAAMANO depositing into the drop box. No other item in the drop box outside those 33 envelopes was comparable to the items agents observed and video recorded CAAMANO depositing in the drop box.

9. Also on March 8, 2018, at approximately 2:00 p.m., agents traveled to the United States Post Office, located at 600 North Neil Street, Champaign, Illinois, where the USPS mail carrier who assisted at the USPS drop box near 2012 Round Barn Road,

Champaign, Illinois, had directly taken the 33 manila envelopes identified as matching the manila envelopes deposited by CAAMANO.

10. Agents visually inspected each of the 33 manila envelopes and observed that the return sender on each of the 33 envelopes was listed as a "Colin H. Taylor". Agents also observed a shipping company, EasyPost, had created the shipping label on each envelope, and all envelopes had the same EasyPost account number: C26321.

St. Louis, Missouri, Package

11. Agents observed that one of the 33 packages was addressed to an individual in St. Louis, Missouri. Law enforcement later obtained consent from the individual to whom the package was addressed to open that package. The package contained a clear plastic vacuum sealed bag with white elongated pills, each marked "Xanax" and "2", and weighing 335 grams. The listed recipient never received the package, as it was retained by law enforcement after it was found to contain pills.

History of Mail Drops

12. Agents interviewed the USPS mail carrier who advised similar manila envelopes had been deposited into four USPS drop boxes in the vicinity of Mattis Avenue and Kirby Avenue in Champaign, Illinois, each day for more than a year. The mail carrier estimated the number of manila envelopes to be between 50 and 100 among the four drop boxes each day.

13. The USPS mail carrier stated he made a formal complaint in March 2017 to management about the quantity of manila envelopes, which had been making his

collection duties very difficult to complete. The mail carrier advised that at the time of the complaint his management contacted the shipper, identified as "Sharon Lee", and advised a non-fictitious mailing address was required, otherwise the manila envelopes would not be shipped. The mail carrier provided a photograph to agents of a manila envelope seen in March 2017 bearing the return shipping name "Sharon Lee". Agents observed the shipping label was created by EasyPost and was associated with the same account number: C26321.

Recovery of Alprazolam in Champaign County

14. On March 9, 2018, agents received information from the Champaign County Sheriff's Office concerning an incident report involving recovered property. On February 21, 2018, the Sheriff's Office took a report at 3206 Halifax Drive, Apartment B, Champaign, Illinois, in which a female subject, identified as T.A., received four boxes delivered to her by USPS, each identifying her as the "return sender". T.A. told the Sheriff's Office that she did not send any boxes and opened one to check its contents. Upon inspection, T.A. observed three gray packages, wrapped in bubble wrap, inside the box. T.A. then opened one gray package and discovered numerous pills, all marked with "Xanax" on each pill. T.A. relinquished custody of the four boxes and their contents to the Sheriff's Office.

15. Agents reviewed photographs taken of the shipping labels on the four boxes and observed a shipping label created by EasyPost with the same account

number as the one used on envelopes bearing the return address names "Colin H. Taylor" and "Sharon Lee". The EasyPost account number was C26321.

16. On March 12, 2018, agents took custody of the four boxes and their contents from the Sheriff's Office. Agents inspected the contents and confirmed the four boxes were each filled with three packages. Each of the three packages contained numerous white elongated pills. Agents observed that each pill bore the marking "Xanax" on one side and the marking "2" on the other side, which markings are consistent with pills made by the pharmaceutical manufacturer Pfizer. Agents could tell upon inspecting the pills through the plastic packaging that several of the pills had lighter markings, indicating possible counterfeit production. On March 27, 2018, laboratory results returned indicating the pills were all alprazolam (Xanax) with a 95% level of confidence and numbered 83,538 dosage units (total pills).

Cleveland Alprazolam Package

17. Meanwhile, on March 8, 2018, Cleveland Police Department Detective John Dlugalinski reported USPS Parcel 9405536897846313514706 (Easy Post) to United States Postal Inspection Services Investigator Bryon Green. The parcel was addressed to a residence in Cleveland, Ohio, and was turned over by a resident who had no knowledge of the parcel. The parcel originated in Urbana, Illinois. The parcel contained more than 1,000 alprazolam pills; the presence of alprazolam was confirmed by the Cuyahoga County Laboratory on March 22, 2018.

18. On March 22, 2018, Investigator Green identified associated mailings going to another address in Cleveland, Ohio. These parcels, like those deposited by CAAMANO into the mail drop box in Champaign, Illinois, had a return address of Colin H. Taylor, 2105 S. Zuppke Dr., Urbana, Illinois, and were associated with EasyPost account C26321.

19. On March 26, 2018, Investigator Green, along with Homeland Security Investigations and the Drug Enforcement Administration, conducted a controlled delivery of the two associated parcels. Agents detained the individual² who received the parcel. That individual signed a consent form permitting law enforcement agents to search his/her residence, which resulted in the recovery of the two parcels associated with EasyPost account C26321, along with various narcotics, numerous Priority Mailing envelopes, label makers, and a food saver machine with plastic bags commonly used for vacuum packaging.

20. The package recipient provided a statement to agents and advised that he/she purchased the "Xanax" (alprazolam) that was recovered from the parcels from a darkweb vendor that he/she had found on a Reddit forum. He/she identified the Reddit user as "Googleplex". He/she stated that "Googleplex" sells "Xanax" on the Dream Market, but advised that he/she purchased directly from "Googleplex" by

² This individual was convicted of narcotics trafficking in at least one other criminal case.

sending Monero³ cryptocurrency to a wallet⁴ provided by "Googleplex". The package recipient stated that he/she communicates with "Googleplex" via email. The recipient stated that he/she ordered from "Googleplex" three times in amounts of \$5,000.00, \$5,000.00, and \$4,000.00 during the winter and spring of 2018 and paid "Googleplex" \$0.60 per "Xanax" pill.

21. In performing a Google search using keywords "Googleplex Reddit", agents were able to see URL results ranging from 2016 to 2018, which referenced "Googleplex" and discussed dark web transactions and "Xanax".

Recovery of Returned Package in Normal, Illinois

22. On Thursday, March 29, 2018, law enforcement agents were contacted by USPS Inspector Keith Williams, regarding a package with EasyPost account C26321, which had been turned into the Normal, Illinois, US Post Office under "refused mail". The EasyPost account number matched the account number CAAMANO was believed to have used to create shipping labels for previous packages. The package was

³ An open-source cryptocurrency that focuses on privacy and decentralization. Monero uses a public ledger to record transactions while new units are created through a process called mining. Monero aims to improve on existing cryptocurrency design by obscuring sender, recipient, and amount of every transaction made, as well as making the mining process more egalitarian.

⁴ A "wallet" or cryptocurrency wallet stores the public and private keys, which can be used to receive or spend the cryptocurrency. A wallet can contain multiple public and private key pairs. The cryptocurrency itself is not in the wallet. The cryptocurrency is decentrally stored and maintained in a publically available ledger. With a private key, it is possible to write in the public ledger in order to spend the cryptocurrency.

addressed to T.W. on Hollywood in Los Angeles, California; originated from Urbana, Illinois; and weighed approximately 2 pounds. The return address was listed as L.W. on High Street in Urbana, Illinois. The package had a USPS label over the recipient address stating, "Return to Sender, Refused, Unable to Forward, Return to Sender". Inspector Williams also advised that L.W., who received the package, had turned the package over to the Normal, Illinois, US Post Office, stating that she did not send the package and had no knowledge of it or its contents.

23. Law enforcement inspection later revealed that the package contained 1,000 pills marked "Xanax".

Residential Search Warrants at Glenshire and Fair Residences

24. On May 27, 2018, residential search warrants were executed at 1510 Glenshire Drive and 510 South Fair Street in Champaign, Illinois. Stephan CAAMANO's rental residence, 510 South Fair Street, was largely empty, although law enforcement agents found various metal machine parts, proof of residency, an instruction manual for a scale, a Toshiba laptop, and a cutting agent powder.

25. At the 1510 Glenshire Drive address, agents found one zp9 rotary tablet press, two 20L mixing machines, 3 commercial grade scales, 3 heavy duty vacuum sealing machines, multiple large plastic bins and containers used to sort and mix powders used to press pills, a container filled with binding agent Firmapress, pressed counterfeit Xanax bars, non-prescribed steroids, doping masking agents, non-FDA approved tramadol and domperidone medicines, tryptamine (psychedelic), multiple

materials used for packaging and shipping items via registered mail, multiple cellular devices, and several computers and computer related components containing memory/hard drive space.. The pill press had been partially taken apart. Agents also discovered a laptop cord to a Toshiba laptop. Agents did not encounter all of the pill presses CAAMANO appeared to have purchased via PayPal.

FURTHER, AFFIANT SAYETH NOT.

s/Todd M. Emery

Todd M. Emery, Special Agent
Drug Enforcement Administration

Subscribed and sworn to before me this
29th day of May, 2018
s/Eric I. Long

THE HONORABLE ERIC I. LONG
United States Magistrate Judge