

UNITED STATES DISTRICT COURT

for the

Northern District of California

FILED

Sep 14 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

United States of America
v.
NATALIE MARIE GONZALEZ
Defendant(s)

Case No. 3:23-mj-71393 MAG

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 April 14, 2023 to Sept. 13, 2023 in the county of San Mateo in the Northern District of California, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Row 1: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(C); Conspiracy to Distribute Methamphetamine. Row 2: Maximum Penalties: 20 years in prison; \$1 million fine; lifetime supervised release and minimum of 3 years supervised release; \$100 special assessment.

This criminal complaint is based on these facts:
See attached affidavit of DEA Special Agent Colin Hart

Continued on the attached sheet.

Approved as to form /s/ Daniel Pastor_
AUSA Daniel Pastor

Sworn to before me by telephone.

Date: 09/13/2023

City and state: San Francisco, California

/s/ Colin Hart
Complainant's signature
Colin Hart, DEA Special Agent
Printed name and title

Signature of Peter H. Kang
Hon. Peter H. Kang, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Colin Hart, a Special Agent (SA) with the Drug Enforcement Administration (DEA) being duly sworn, hereby declare as follows:

INTRODUCTION

1. This Affidavit is made in support of a Criminal Complaint against **Natalie GONZALEZ** for Conspiracy to Distribute Controlled Substances in violation of 21 U.S.C. § 846 and 21 U.S.C. § 841(a)(1) and (b)(1)(C) for her role in a Door Dash-style drug delivery operation which distributes methamphetamine pills, cocaine, and other drugs throughout the San Francisco Bay Area. **GONZALEZ's** co-conspirators Matthew SESTAK, Frederick GAESTEL, and Rory RICKEY have already been charged with distribution of methamphetamine.

2. The facts in this affidavit are based on my personal observations and knowledge, my training and experience, my review of reports prepared by other law enforcement officers and records prepared by others, information from records and databases, and information obtained from other government agents and witnesses. Because this affidavit is made for the limited purpose of obtaining the requested search warrant, I have not set forth every fact learned during the investigation; I have set forth only those facts that I believe are necessary to establish probable cause for the requested warrant.

3. Where actions, conversations, and statements of other individuals are referenced in this affidavit, they are described in sum and substance and in relevant part only, unless otherwise noted. Similarly, where information contained in reports, recordings, and/or other documents or records is referenced in this affidavit, such information is also described in sum and substance and in relevant part only, unless otherwise noted.

AFFIANT BACKGROUND

4. I am a Special Agent (“SA”) employed by the DEA and have been so employed since December 2019. I am currently assigned to the San Francisco Field Division. I am authorized and am presently assigned to investigate violations of the Controlled Substance Act

(“CSA”), Title 21 of the United States Code, and other violations of federal law.

5. Prior to becoming a DEA Special Agent, I was a legal analyst with Verizon Wireless. In this capacity, I assessed and processed legal inquiries from various local, state, and federal law enforcement agencies. I also conducted cellular phone data extractions, real-time GEO tracking, and installed location tracking programs to assist in Verizon Wireless’s mission to complement the emergency services requests of various law enforcement agencies across the country.

6. During my employment with the DEA, I have received nineteen weeks of full-time formalized education, training, and experience at the DEA Basic Agent Training Academy in Quantico, Virginia. This education, training, and experience included but was not limited to drug detection, drug interdiction, money laundering techniques, and schemes and investigation of individuals and organizations involving the smuggling, cultivation, manufacturing, and illicit trafficking of controlled substances. As a Special Agent, I have participated in multiple narcotics investigations. I have debriefed defendants, confidential sources, and witnesses who had personal knowledge regarding narcotics trafficking organizations. I have conducted complex dark web and cryptocurrency investigations. I also have participated in many aspects of drug investigations including but not limited to telephone toll analysis, records research, and physical and electronic surveillance. I have participated in the execution of several federal search and arrest warrants that resulted in the arrest of suspects and seizure of narcotics. In addition, I have attended a training course regarding drug smuggling and interdiction.

7. I have also had the opportunity to speak extensively with other experienced law enforcement officers and cooperating individuals about the packaging and preparation of narcotics, methods of operation, and security measures often employed by drug traffickers. I have examined documentation of various methods in which illicit drugs are smuggled, transported, and distributed. Throughout these investigations, I have also gained expertise in the use of a variety of law enforcement techniques, including the application and use of wire and electronic interceptions, confidential sources and undercover agents, surveillance techniques, and

various other types of electronic techniques, such as body wires and transmitters. Additionally, I have gained knowledge and expertise in the use and analysis of data from pen register and trap-and-trace devices, toll records, traditional business records (including financial records and utility records) and nontraditional records kept by drug traffickers, such as pay-and-owe sheets documenting deliveries of and payments for narcotics. I have also gained knowledge and expertise in the collection and identification of drug evidence and the analysis and interpretation of taped conversations.

8. Through my training, education, experience, and my conversations with other agents and officers who conduct drug investigations, I have become familiar with narcotics traffickers' use of mobile telephones and mobile telephone applications, Internet applications, social media applications, as well as narcotics traffickers' use of numerical codes and code words to conduct business. I have become familiar with narcotics traffickers' methods of operation, including, but not limited to, the manufacturing, distribution, storage, and transportation of narcotics, and the methods used by drug traffickers to collect, transport, safeguard, remit, and/or launder drug proceeds.

9. Through my work and training, I am familiar with the how narcotics traffickers use telephones, cellular telephone technology, pagers, coded communications, or slang-filled telephone conversations, false or fictitious identities, and other means to facilitate their illegal activities and thwart law enforcement investigations. Based upon my training and experience, I know that it is common practice for narcotics traffickers to use pagers, telephones, and/or cellular telephones to communicate with their customers, suppliers, couriers, and other co-conspirators to insulate themselves from detection by law enforcement. It is common for them to initiate cellular phone service under the name of an associate or fictitious name.

10. I have had many discussions with other experienced law enforcement officers and have conducted, and been present at, many interviews of self-admitted narcotics traffickers and cooperating defendants concerning how drug traffickers and money launderers operate. I know that drug traffickers often hold proceeds traceable to their drug-trafficking activities in the form

of United States currency, funds in bank accounts, high-value personal property items, and real property. But I also know drug traffickers are now increasingly holding drug-trafficking proceeds in virtual currency or cryptocurrency.

11. Based on my training, research, education, and experience, I am familiar with the Dark Web and Cryptocurrencies. I know that cryptocurrencies are different from traditional currencies in that cryptocurrencies are not issued by or backed by any government. In addition, cryptocurrency accounts and wallets are different from traditional bank accounts in that these accounts are held in digital format in one of any number of various types of digital wallets or exchanges. Likewise, cryptocurrency is accessible only by the account holder or someone who has access to the account password or account “recovery seed,” a mnemonic passphrase made up of a series of random words, or in some circumstances, by the company hosting the virtual wallet containing the cryptocurrency. Account holders can send and receive cryptocurrency using a unique and complex wallet address, often referred to as the private key.

12. Unless otherwise noted, when I assert that a statement was made, I have either heard the statement directly or listened to a recording of the statement, or the statement was reported to me by another law enforcement officer, either directly or indirectly in a written report. The officer providing me with the information may have received the information by way of personal knowledge or from another source. My understanding of certain events, facts, and evidence may change or develop as this investigation progresses.

APPLICABLE LAW

13. Title 21, United States Code, Section 841(a)(1) makes it unlawful for any person to knowingly possess with intent to distribute or to distribute a controlled substance. Methamphetamine and Adderall are Schedule II controlled substances.

14. Title 21, United States Code, Section 846 makes it unlawful for any person to conspire with others to distribute a controlled substance.

STATEMENT OF PROBABLE CAUSE

Overview of Investigation

15. In March 2023, the Drug Enforcement Administration (DEA) identified a drug trafficking organization (DTO) operating out of East Palo Alto, California. The investigation has shown that the DTO's members include **GONZALEZ**, **GAESTEL**, **RICKEY**, **SESTAK**, and others.

16. The DTO sells a variety of narcotics throughout the San Francisco Bay Area including methamphetamine pills, cocaine, and MDMA. The group uses the encrypted messaging application Signal to market and sell drugs.

Information From Confidential Source (CS-1)

17. In March 2023, a DEA Confidential Source (CS-1)¹ identified **GONZALEZ** as the leader of the DTO.

18. CS-1 told agents that **GONZALEZ** uses the encrypted chat app Signal and the Signal screen name "Soter" to manage the DTO.

19. Prior to working for the DEA, CS-1 had repeated drug business with **GONZALEZ** and had met with **GONZALEZ** in person on multiple occasions in addition to interacting on Signal with **GONZALEZ** who CS-1 said used the screen name "Soter".

20. CS-1 advised agents that **GONZALEZ** has a drug "menu" which she sends to customers to market her DTO's available narcotics.

21. CS-1 explained that the Signal account "The Shop" is used by **GONZALEZ** and

¹ In March 2023, the DEA executed a federal search warrant at CS-1's residence. During the search, agents located controlled substances and evidence of narcotics trafficking. CS-1 agreed to work with the DEA on its investigation. CS-1 has not been charged at this time. A review of CS-1's criminal history shows no other arrests and no criminal convictions. To date, agents have not known CS-1 to provide any information determined to be false or misleading. Agents are often able to corroborate CS-1's information through surveillance and other sources. Based on that corroboration, agents believe CS-1 is reliable.

her drug couriers.

22. CS-1 explained that “The Shop” functions as a general customer service account for the DTO’s customers.

23. CS-1 also told agents that “Natalie” resides and operates out of her residence at 620 Montage Circle in East Palo Alto, California.

24. Agents identified **Natalie GONZALEZ**, a 30-year-old female who is approximately 5’4” and resides at 620 Montage Circle, East Palo Alto, California, from public and law enforcement databases.

25. Agents showed **GONZALEZ**’s Colorado driver’s license photo to CS-1. CS-1 confirmed that the woman in the license photo is the individual CS-1 knows as “Natalie” and the user of the Signal account “Soter.”

26. When agents executed a federal search warrant on September 13, 2023, they seized a cell phone from **GONZALEZ**. Agents called the telephone number that agents know is linked to the “**Soter**” Signal account. **GONZALEZ**’s phone began ringing and showed an incoming call from the agent’s phone.

CS-1 Introduces DEA Undercover Agent (UC) to GONZALEZ and the DTO

27. In March 2023, CS-1 created a group chat on the Signal app between a DEA Undercover Agent (“UC”), CS-1, and “The Shop” to introduce the UC to the DTO.

28. In the Signal chat, CS-1 introduced the UC to the group and explained that the UC lived in San Mateo and wanted to order of drugs and be added to the “route.”

March 29, 2023: UC Buys Two Ounces of Cocaine

29. After CS-1 introduced the UC to “Soter” and the “The Shop”, the UC asked to order of “2 bs of dps and [eight-ball-emoji] of [snow-flake-emoji].”

30. I know from my experience with narcotics investigations that “2 bs of dps” is street slang for 2,000 Adderall pills pressed with the “dp” stamp that appears on prescription

Adderall pills.

31. I also know from my training and experience that “bs” is street slang for two “boats” and that a “boat” is street slang for a quantity of 1,000 pills.

32. Based on my training and experience, I know that eight-ball emoji is commonly used to refer to 1/8th of an ounce of a drug (usually cocaine) and that the snow-flake emoji is commonly used in electronic communications to refer to cocaine.

33. The Shop responded: “Yeah so the route generally starts at 7pm to 11pm does that work for you.”

34. The UC confirmed that the 7-11pm delivery window would work and provided the Laurelwood Shopping Center, 1206 W Hillsdale Boulevard, San Mateo, CA, as the UC’s preferred meet address.

35. The Shop wrote: “So we try to hit you up with an exact eta about a stop or two away how long of a heads up do you need.” The UC replied that he needed 30 minutes.

36. The Shop responded: “Awesome I’ll add the note in for you and let you know delivery time frame as soon as i can I’m realizing you said San Mateo gotta see if that fits better with tonight’s sf or tomorrow east bay let me check on that for you sorry I missed that earlier” / “It’s labeled Wednesday I just wanna make sure so everyone is on the right page here” / “Okay yeah tonight will fit I’m working on building the route now so I’ll let you know a relative eta and then you’ll get updated during the actual route.”

37. The Shop later messaged the UC that the drug delivery would occur around 7:30 PM on March 29, 2023

38. The Shop then created a Signal chat for the UC’s deliveries on Signal between the UC, The Shop, and two additional screen names “**Soter**”, and “Driver M” (who agents later identified as drug courier Matthew Sestak).²

39. The Shop wrote: “Hey friend! Our driver M will be delivering your order tonight

² SESTAK has been charged with distribution of methamphetamine in Case No. 3:23-mj-71384.

and will be in your area in the 7:30-8:30pm range. He will let you know his eta when he is one stop away (usually about 10min). Please meet him at the car (silver Prius Prime) with exact change and either: - Hop in for a short “Uber” ride around the block - Get your order through the window like Door Dash.”

40. The Shop wrote: “Please keep money exchanges out of view of the window / Address: - 1206 w Hillsdale Blvd Total: \$2200.”

41. The UC and Driver M (SESTAK) both confirmed the planned drug transaction in the Signal chat.

42. On March 29, 2023, the UC met with SESTAK inside the drug courier’s silver Prius Prime.

43. SESTAK handed the UC a white paper bag with a clover sticker on it which contained a white powdery substance which appeared to be cocaine in a clear plastic Ziploc bag.

44. SESTAK then said that “we” have a full return policy. If the UC did not sell all the cocaine, the UC could return or exchange what the UC did not sell.

45. The UC asked SESTAK if his organization sold Adderall pills. SESTAK said they had Adderalls and recently sold three “boats.”

46. SESTAK then asked if the UC had the “full menu.” The UC said no and requested the menu.

47. SESTAK said that he would have to confirm with “the girl who makes the call.”

48. Based on my training and experience and my knowledge of the investigation, when SESTAK referred “the girl who makes the call,” in response to the UC’s question about obtaining the “menu,” I believe SESTAK was referring to **GONZALEZ** and suggesting that he needed **GONZALEZ**’s permission to provide the UC with the “full menu.”

49. The UC then handed SESTAK the agreed purchase price of \$2,200.

50. The UC asked if he should message the same group chat for future deliveries. SESTAK confirmed.

51. SESTAK then explained how the organization delivered drugs throughout the San

Francisco Bay Area. SESTAK said “we” deliver to San Francisco and this side of the Bay on Wednesdays and to Oakland and the North Bay on Thursdays.

52. The suspected cocaine that the UC purchased from SESTAK was later tested at a DEA laboratory and determined to be Cocaine Hydrochloride with a net weight of approximately 56 grams and a pure cocaine weight of approximately 50 grams.

April 14, 2023: UC Buys 2,000 Fake Adderall Pills

53. Shortly after the above-described cocaine transaction, the UC was added to a Signal group chat between the UC, The Shop, “**Soter**”, and “**Chronos**”.³ Each of these screen names was linked to an associated telephone number that was visible to the UC on the Signal app.

54. On April 10, 2023, the UC sent a message to the Signal group asking to purchase 2,000 fake Adderall pills.

55. **Soter** responded on April 12, 2023: “Hey there, sorry can you remind us who connected you?”

56. The UC replied that he had purchased cocaine from the group in San Mateo.

57. **Soter** responded: “Yes sorry now I remember, just forgot to make a note in phone and we deal w a lot of ppl so always like to verify.” The UC then asked for confirmation on the order of “2 bs”, referring to two boats or 2,000 fake Adderall pills.

58. **Soter** responded on April 13, 2023: “Hey sorry got swarmed w messages and forgot to hit you back” / “Yes we can do that for ya, does tomorrow 11am-3pm range work?” / “work*” / “tonight’s route is getting a little wild,” / “and please lmk address”.

59. The UC confirmed the deal and wrote: “Laurelwood shopping center, 1206 W

³ When agents executed a search warrant on September 13, 2023, they seized a cell phone that was found with the driver’s license of the man who agents know to be **GONZALEZ**’s boyfriend with whom she resides. An agent called the telephone number that agents know is linked to the “**Chronos**” Signal account. The phone found with the license of **GONZALEZ**’s boyfriend began ringing and showed an incoming call from the agent’s phone.

Hillsdale Blvd, San Mateo, CA”. The UC asked for the price of the fake Adderall pills.

60. On April 14, 2023, **Soter** messaged: “Hey sorry for the delay We can do 2k per so 4 total.”

61. The UC agreed to the price of \$2,000 per boat for a total price of \$4,000 in exchange for 2,000 fake Adderall pills.

62. Later, on April 14, 2023, the UC met with SESTAK in the Laurelwood Shopping Center parking lot.

63. SESTAK handed the UC a brown paper bag with black writing.

64. The UC asked if he could observe what was in the paper bag. The UC then opened the brown paper bag that SESTAK handed the UC and observed two Ziploc bags containing suspected Adderall pills and a black mylar bag.

65. As the UC took out the arranged \$4,000, SESTAK advised the UC to place the money under the blanket in the trunk of his Prius. SESTAK then closed the trunk.⁴

66. Laboratory testing of the suspected fake Adderall pills confirmed the substance to contain Methamphetamine and indicated a net methamphetamine weight of 670.7 grams and a pure methamphetamine weight of 24.1 grams.

The DTO’s Drug Menu and In-Person Delivery Process

67. On April 26, 2023, the UC sent a message to the Signal group asking for the new drug menu.

68. **Soter** responded: “For sure,” and sent a menu with a list of several different types of drugs and details about the DTO’s “Ordering Protocol”.

69. **Soter** wrote: “And lmk what in particular if it’s not on there” / “not sure if you ever deal w bulk things other than pills but we have great prices on molly and k right now.”

70. The menu stated: “WE’RE HIRING!” / “We need more delivery drivers”.

⁴ On or about August 29, 2023, CS-1 advised agents he/she was messaging “Soter” on Signal about SESTAK’s role with the DTO. **Soter** told CS-1: “He is no longer doing any shop related stuff”.

71. The menu section titled “Ordering Protocols” stated: “We have a \$300 minimum order for postal shipments and Bay Area delivery” / “We only accept CASH or CRYPTO (if you don’t already have crypto, we’ll walk you through it).”

72. With respect to in-person delivery, the menu stated: “Delivery: Order by the night before relevant delivery day to receive your order” / “SF deliveries are WEDNESDAY night 8-11p” / “EAST BAY deliveries are THURSDAY night 8-11pm”.

June 14, 2023: UC Purchases 1,000 Fake Adderall Pills

73. On June 11, 2023, the UC sent a message to the Signal group asking for the new drug menu.

74. According to the menu sent by **Soter**, as of June 12, 2023, the DTO was selling: Cocaine, LSD, MDMA and various ecstasy variants, DMT, GHB, GBL, ketamine in rock and spray form, Xanax as well as other drugs.

75. On June 12, 2023, the UC sent another message requesting to purchase 1,000 Adderall pills.

76. On June 13, 2023, **Soter** wrote: "Yes we can do that, \$3K for the [iPhone-Boat-Emoji]" / “And you're still in San Mateo ish?”

77. The UC confirmed that he was located in San Mateo. The UC then requested that **Soter** lower the price for 1,000 Adderall pills closer to \$2,000, closer to what the UC paid for the previous purchase of 2,000 Adderall pills.

78. **Soter** responded: “most recent ones we bought were more expensive (been hard to find good sourcing)” / “Can we call it 2500? and if you get more in future we can drop to 2.”

79. The UC acknowledged, confirmed the price, and then asked if the deal would take place in San Mateo, CA on June 14, 2023. **Soter** confirmed that “we're delivering in that direction tonight.”

80. Later that day, **Soter** wrote: “Hey Friend! Our Driver F will be delivering your order tonight in a black Honda Accord with Oregon plates and a cute black/white puppy - []

Laurelwood Shopping Center, 1206 West Hillsdale Blvd - [] \$2500 - [] 7:40-8:30 He will let you know his eta when he is one stop away (usually about 10min).”

81. **Soter** continued: “Please meet him at the car (black Honda Accord) with exact change and either: - Hop in for a short “Uber” ride around the block - Get your order through the window like Door Dash / Please keep money exchanges out of view of the window.”

82. That evening, the UC met with GAESTEL⁵ outside of the drug courier’s black Honda Accord.

83. The UC asked if GAESTEL was “F,” and GAESTEL confirmed that he was.

84. GAESTEL stated that a woman told him what to do.

85. Based on my knowledge of the investigation, when GAESTEL explained that a female told him what to do when delivering drugs, I believe GAESTEL was referring to GONZALEZ and suggesting **GONZALEZ** was his boss and the leader of the DTO.

86. GAESTEL then handed the UC a brown paper bag with white-colored spots, which contained a clear Ziploc bag containing orange pills with markings “b 974” and “30”.

87. The UC then handed GAESTEL the agreed \$2,500. The UC observed GAESTEL place the cash in a pocket.

88. Laboratory results for the suspected fake Adderall pills confirmed the substance to be Methamphetamine (calc. as Hydrochloride) and indicated a net weight of 385.0 grams and a pure methamphetamine weight of 19.2 grams.

89. Following the controlled buy from GAESTEL, agents conducted continuous mobile surveillance of GAESTEL as he drove for about 4.5 hours making suspected drug deliveries in San Francisco, meeting multiple individuals, and conducting hand-to-hand transactions while getting in and out of the Honda.

90. Around 12:51 AM, agents observed GAESTEL park his black Honda Accord near 620 Montage Circle—**GONZALEZ**’s residence—and enter the residence’s wooden gate

⁵ GAESTEL has been charged with distribution of methamphetamine in Case No. 3:23-mj-71382.

entrance.

91. Agents know from surveillance that GAESTEL resides at 74 Henderson Place and that **GONZALEZ** and her boyfriend reside at 620 Montage Circle.

June 22, 2023: UC Asks About a Bulk Order of Fake Adderall Pills

92. On June 22, 2023, the UC sent a message to the Signal group asking to purchase between 5,000 and 10,000 fake Adderall pills.

93. **Soter** responded: “We have maybe a few left of those ones. Some of them are sort of spotted with white though” / “Trying to get them replaced but haven't heard back yet” / Can do 1000 each on 10 of them” / “Five at 1500.”

94. **Soter** then asked the UC: “who is your primary clientele with those?” / “We serve a lot of students and young professionals, who use them for work, but I’m curious what you’re understanding of the use case for your clients.”

95. The UC asked about lowering the price of the “spotted” Adderall and explained that he sells to “college kids/my post grad friends”.

96. **Soter** responded: “thank you for sharing, I more just want to make sure that we are sharing responsibility rather than contributing to addictions that are damaging people” / “We can definitely do more bs, especially as we gain trust and see shared values/ruels” / “rules*”.

July 13, 2023: Agents See GONZALEZ and GAESTEL Working Together Before Observing GAESTEL Conduct a Suspected Drug Delivery

97. On July 13, 2023, agents observed **GONZALEZ**’s silver colored Toyota van park on the street outside of 74 Henderson Place in Menlo Park—GAESTEL ’s residence—around 6:07 PM.

98. Around 6:08 PM, agents observed **GONZALEZ** get out of the Toyota van, retrieve a brown-colored box from the van, and enter 74 Henderson Place.

99. Around 7:05 PM, agents observed GAESTEL go in and out of 74 Henderson

Place and move items around in his Subaru Forester.

100. Around 7:07 PM, agents saw **GONZALEZ** leave 74 Henderson Place carrying a brown box and place it in the trunk of GAESTEL's white Subaru Forester.

101. Around 7:10 PM, agents saw **GONZALEZ** and GAESTEL place several brown paper bags in a box in the trunk of GAESTEL's Subaru Forrester.

102. Based on the investigation, I know that the DTO commonly uses paper bags to conceal drugs during drug exchanges. Further, I know from the UC's Signal chats with the DTO that the DTO sells drugs in the "EAST BAY"—on Thursdays.

103. Based on it being a Thursday, and **GONZALEZ** and GAESTEL loading paper bags into GAESTEL's vehicle outside of 74 Henderson Place, I believe **GONZALEZ** and GAESTEL were loading drugs into GAESTEL's vehicle for him to distribute on a regular route.

104. Around 7:12 PM, agents followed GAESTEL as he drove the white Subaru Forester from 74 Henderson Place to the area of 137th Avenue, San Leandro, CA where he parked on the street near 1749 137th Avenue, San Leandro, CA.

105. Around 7:55 PM, agents observed GAESTEL exit his white Subaru Forester with a small dog, go to the trunk of the vehicle, appear to retrieve an unknown item from the trunk, and walk down 137th Avenue while manipulating his phone.

106. At approximately 7:56 PM, agents observed GAESTEL meet with an unknown female and hand the woman a brown paper bag. Agents then saw the woman hand GAESTEL cash.

107. Based on my training and experience, and the investigation, I believe that this observation was consistent with a hand-to-hand drug transaction.

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July 26, 2023: Agents See GONZALEZ and GAESTEL Placing Boxes and Bags into GAESTEL's Vehicle Shortly Before GAESTEL Sells 1,000 Fake Adderall Pills to the UC.

108. Prior to a scheduled UC drug buy from GAESTEL on July 26, 2023, agents set up surveillance at 620 Montage Circle (Gonzalez's residence) and 74 Henderson Place (Gaestel's residence).

109. Around 5:22 PM, agents observed **GONZALEZ**, driving her silver Toyota van leave 620 Montage Circle and drive to 74 Henderson Place and park in the driveway of the residence.

110. Around 5:30 PM, agents saw GAESTEL exit 74 Henderson Place and greet **GONZALEZ**. The two then entered 74 Henderson Place.

111. Around 5:31 PM, agents saw **GONZALEZ** leave 74 Henderson Place, retrieve a large brown cardboard box from her silver Toyota van, and then go back inside 74 Henderson Place.

112. Around 5:32 PM, agents observed GAESTEL leave 74 Henderson Place, retrieve a medium-sized brown cardboard box from **GONZALEZ's** silver Toyota van, and then go back inside 74 Henderson Place.

113. While agents were surveilling GAESTEL and **GONZALEZ's** activities at 74 Henderson Place, **Soter** messaged the UC on Signal around 6:07 PM: "Hey Friend! Our driver Franz will be delivering your order tonight in a white Subaru Forester with a cute black/white puppy - 1206 West Hillsdale Blvd - \$2500 - 7:15-8pm He will let you know his eta when he is one stop away (usually about 10min)."

114. **Soter** continued: "Please meet him at the car (white Subaru Forester) with exact change and either: - Hop in for a short "Uber" ride around the block - Get your order through the window like Door Dash - Or play with the pup outside the car to cover up a casual swap :)".

115. Around 7:10 PM, agents saw GAESTEL leave 74 Henderson Place with his dog. GAESTEL was carrying two large brown cardboard boxes that he put in the trunk of his white Subaru Forrester.

116. The UC and “Driver F” (GAESTEL) then discussed on Signal where to meet in the Laurelwood Shopping Center parking lot.

117. Around 7:18 PM, agents observed GAESTEL depart 74 Henderson Place driving his white Subaru Forrester.

118. Agents followed GAESTEL to the Laurelwood Shopping Center—the location specified by Soter for the sale of the 1,000 Adderall pills.

119. Around 7:41 PM, the UC drove into the Laurelwood Shopping center parking lot and observed GAESTEL there with a small black and white dog.

120. The UC met with GAESTEL in the parking lot. The UC greeted GAESTEL and then crouched down to play with GAESTEL’s black and white puppy as Soter had suggested the UC do in her Signal message.

121. GAESTEL handed the UC a white paper bag which contained a clear Ziploc bag containing orange pills with markings “b 974” and “30,” which the UC believed to be fake Adderall pills pressed with methamphetamine.

122. The UC then handed GAESTEL the arranged \$2,500, and agents observed GAESTEL place the \$2,500 in his front sweatshirt pocket.

123. GAESTEL departed in the white Subaru Forrester around 7:46 PM.

124. Shortly after the drug transaction, around 7:55 PM, agents observed GONZALEZ leave GAESTEL’s residence at 74 Henderson Place, lock the door, and depart in her silver Toyota van.

August 16, 2023: UC Attempts to Buy 4,000 Fake Adderall Pills Containing Methamphetamine

125. On August 11, 2023, the UC sent a message to the Signal group asking if any “4 ad bs⁶” were available for purchase the following week. On August 13, 2023,

126. On August 13, 2023, Soter responded: “Let me double check but I think yes”.

⁶ I know from my training and experience that when the UC said, “4 ad bs,” the UC was using common drug slang to refer to a quantity of 4,000 Adderall pills.

127. On August 15, 2023, the UC sent a message to the Signal group chat asking for an update on the price of the 4,000 Adderall pills. The Shop responded: “not a bother, it's helpful to get a ping from time to time. I don't have the chat history to know what you're requesting a price on, I'll ping @Soter to this.”

128. The UC acknowledged and asked for a price of \$1,500 per 1,000 pills for a total of 4,000 pills.

129. The Shop responded: “1206 W Hillsdale Blvd, San Mateo, CA ?” Soter replied: “yes” and “\$6000 total.”

130. The UC then began to discuss paying the \$6,000 for 4,000 fake Adderall pills utilizing cryptocurrency. During these discussions, both Signal accounts, The Shop, and Soter confirmed the UC's ability to pay that way, provided detailed instructions how to pay, and provided cryptocurrency wallets for the UC to pay to.

131. On August 16, 2023, in the Signal chat for the UC's deliveries, **Soter** wrote: “Hey Friend! Our driver R will be delivering your order tonight in a silver Toyota Matrix hatchback - 1206 West Hillsdale Blvd - \$6000 total - 9:50-10:50pm / He will let you know his eta when he is one stop away (usually about 10min).”

132. The UC asked if the drug delivery could be earlier in the night.

133. **Soter** responded: “Hey sorry it's a huge route tonight so second driver isn't available until 9.” The UC acknowledged and said he would purchase the Adderall during the following week.

134. **Soter** responded: “oh sorry about that! we make the route and give actual eta in the 5-630 range” / “And I was on the road to Telluride and kept losing service so I apologize we didn't check in with you sooner.”

135. The UC acknowledged and mentioned how Telluride is cool.

136. **Soter** responded: “ok appreciate your flexibility and we can get you when is back (when are you back?)” / “telluride is so beautiful”.

137. The UC messaged them to enjoy Telluride.

138. **Soter** responded: “It's so beautiful here!! And went from 70s and hot AF to hailing, gotta love colorado weather.”

GONZALEZ Stopped by Police in Telluride, Colorado on August 21, 2023

139. While discussing the sale of 4,000 fake Adderall pills to the UC on August 16, 2023, **Soter** repeatedly stated that she was away in Telluride, Colorado.

140. Agents contacted the Telluride Marshals Department about locating **GONZALEZ** in Telluride, CO in her silver Toyota van.

141. On August 21, 2023, Telluride law enforcement advised federal agents that, around 9:55 AM Mountain Time, they conducted a traffic stop for speeding and identified **GONZALEZ** who was driving her silver Toyota van in the Telluride, Colorado area.

142. Body camera footage from the traffic stop was reviewed by agents. The video shows that **GONZALEZ** was driving in Telluride, Colorado on August 21, 2023.

UC Purchases 4,000 Fake Adderall Pills from RICKEY August 24, 2023

143. On August 23, 2023, the UC sent a message to the Signal group asking if “4 bs⁷” were available for purchase the following day.

144. On August 23, 2023, **Soter** responded: "Hi yes they're ready for you".

145. The UC asked where he would pick up the drugs the following day.

146. The Shop responded: “I will likely be passing through your area on Friday for make-up deliveries that don't make it there tonight” / “Soter will confirm/deny/reschedule for us- but yes, the 4 are still ready for you.”

147. The UC requested to meet Thursday in Hayward, CA.

148. The Shop responded: “yeah, you would possibly passing by us to get to Hayward as is” / “I'll make a note for @Soter to coordinate with you.”

⁷ When the UC wrote “4 bs,” I know from my training and experience that the UC was referencing the quantity of 4,000 Adderall pills.

149. **Soter** then wrote: “Yes we can have someone meet you at Target in EPA
Thursday What time ish?”

150. The UC confirmed the deal for 3:30 PM at the Target store in East Palo Alto, CA.

151. On August 24, 2023, the UC sent a message to the Signal group and advised he would be arriving in East Palo Alto, CA, earlier than expected.

152. **Soter** wrote: “Ok cool one driver just finished something and can be there early.”

153. Around 3:41 PM, the UC drove into the Target Parking lot, 1775 E Bayshore Road, East Palo Alto, CA, and observed RICKEY's silver Toyota Matrix.

154. The UC exited his vehicle, entered the front passenger door of RICKEY’s Toyota Matrix, and greeted RICKEY.⁸

155. When the UC entered the vehicle, the UC observed RICKEY holding a brown paper bag with black markings on it, which contained four clear Ziploc bags containing orange pills with markings “b 974” and “30”.

156. RICKEY introduced himself as “Rory.” RICKEY explained that “they” gave him the name “Kairos” for deliveries.

157. RICKEY then offered the UC the brown paper bag with black markings containing the fake Adderall pills pressed with methamphetamine, and then placed it in the center console area of the vehicle. RICKEY told the UC that things have been hectic because people are ordering a lot for “Burning Man.”⁹

158. The UC asked RICKEY if he would be driving for the group on a regular basis. RICKEY said yes and explained he will be in the area until January.

159. The UC told RICKEY that the crypto exchange was loading slowly. RICKEY advised that it was okay and explained that he would not be the one receiving it.

160. RICKEY then asked the UC to check the drugs and proceeded to open the brown

⁸ RICKEY has been charged with distribution of methamphetamine in Case No. 23-mj-71383.

⁹ Burning Man is an event held annually in the western United States. It is known—among other things—for prevalent drug use.

paper bag with black markings containing the fake Adderall pills.

161. The UC asked if **Soter** is the boss. RICKEY said yes.

162. The UC asked RICKEY if he had a long delivery route. RICKEY said no and explained that he does “smaller routes” and that the “other driver,” “F” or “Franz” does longer delivery routes. RICKEY said the other driver will drive for hours but that he (RICKEY) would drive the South Bay and nearby.

163. The UC asked how he began working with the group. RICKEY said he knew the right people. RICKEY said that they are practicing a form of harm prevention and explained how they had had friends who overdosed.

164. While discussing cryptocurrency with the UC, RICKEY said that “they” do large cryptocurrency for cash exchange in which the group took a percentage of the exchange.

165. Around 4:08 PM, the UC exited RICKEY’s silver Toyota Matrix and returned to the UC’s vehicle to try to send Bitcoin in exchange for the 4,000 fake Adderall pills.

166. The UC returned to RICKEY’s vehicle and told RICKEY the UC could not get the cryptocurrency payment to work.

167. RICKEY then said he would call “them” and called **Soter** on speakerphone through a Signal audio call.

168. The UC noted that the individual who answered the Signal audio call to **Soter** sounded like a woman.

169. The UC then spoke to **Soter** directly on the Signal audio call.

170. The UC told **Soter** that the UC needed to send the BTC from a desktop computer.

171. **Soter** said that she would send a different code for the UC to try on Signal.

172. **Soter** then sent a Signal message with a cryptocurrency wallet address.

173. RICKEY then asked **Soter** what to do if the cryptocurrency transfer did not work.

174. **Soter** asked the UC whether, if the transfer on the UC’s desktop did not work, the UC would be able to meet up for a cash payment. The UC agreed.

175. **Soter** told the UC if it did not work, they could figure out cash payment in the

next few days. The UC told them the transfer was not working.

176. **Soter** then said it was okay for the UC to take the Adderall pills now and send the cryptocurrency once he got home.

177. The UC said goodbye to **Soter**, and **RICKEY** ended the Signal audio call.

178. Agents have played the Signal audio call for CS-1 who is familiar with **GONZALEZ**'s voice. CS-1 confirmed that the female voice heard on the call is that of **GONZALEZ**.

179. The UC confirmed with **RICKEY** that the UC would take the drugs. The UC exited the vehicle with the pills and departed.

180. A TruNarc field test of the fake Adderall pills showed a presumptive positive test result for methamphetamine.

181. On September 13, 2023, when agents executed a search warrant on **GONZALEZ**, agents spoke with **GONZALEZ**. The UC recognized **GONZALEZ**'s voice as the voice the UC had heard on the Signal call with Soter.

CONCLUSION

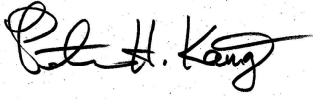
182. Based upon the information set forth in this Affidavit, I respectfully submit that there is probable cause to believe that between March 2023 and August 2023, in the Northern District of California, **Natalie GONZALEZ** conspired with others to distribute methamphetamine in violation of 21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(C). I respectfully request that the Court issue an arrest warrant for **GONZALEZ**.

I declare under penalty of perjury that the above is true and correct to the best of my knowledge and belief.

_____/s/ Colin Hart_____
COLIN HART
Special Agent
Drug Enforcement Administration

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Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim. P 4.1
and 4(d) on ~~this 2nd~~ of September 2023.
this 13th day of September 2023.

A handwritten signature in black ink, appearing to read "Peter H. Kang". The signature is written in a cursive style with a large initial "P".

HON. PETER H. KANG
United States Magistrate Judge