

AO 91 (Rev. 02/09) Criminal Complaint

# United States District Court

for the  
Western District of New York

United States of America

v.

LEELADHAR H. TANDEL,  
BARRY M. WRIGHT, and  
JESUS ANDON,

*Defendants*



## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

### COUNT 1

#### **(Conspiracy to Possess with Intent to Distribute, and to Distribute, Controlled Substances)**

Beginning in or about May 2023, and continuing to in or about July 2025, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendants, **LEELADHAR H. TANDEL, BARRY M. WRIGHT, and JESUS ANDON**, did knowingly, willfully, and unlawfully combine, conspire, and agree together and with others, known and unknown, to commit the following offenses, that is to possess with intent to distribute, and to distribute, Fentanyl, a Schedule II controlled substance; Methamphetamine, a Schedule II controlled substance; Tapentadol, a Schedule II controlled substance; Oxycodone, a Schedule II controlled substance; Amphetamine/Dextroamphetamine, a Schedule II controlled substance; Alprazolam, a Schedule IV controlled substance; Clonazepam, a Schedule IV controlled substance; Tramadol is a Schedule IV controlled substance; and Zolpidem, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(2).

**All in violation of Title 21, United States Code, Section 846.**

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

**JASON  
DOMENECH**

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DOMENECH  
Date: 2025.07.22 09:22:04 -04'00'

*Complainant's signature*

**JASON DOMENECH  
SPECIAL AGENT  
DRUG ENFORCEMENT ADMINISTRATION**

*Printed name and title*

Criminal Complaint submitted electronically by e-mail in .pdf format. Oath administered, and contents and signatures attested to me as true and accurate telephonically pursuant to Fed R. Crim. P. 4.1.

Date: July 22, 2025

City and State: Buffalo, New York

*Judge's signature*

**HONORABLE MICHAEL J. ROEMER  
UNITED STATES MAGISTRATE JUDGE**

*Printed name and title*

**AFFIDAVIT**

STATE OF NEW YORK    )  
COUNTY OF ERIE        )    SS:  
CITY OF BUFFALO        )

**I.    INTRODUCTION**

I, **JASON DOMENECH**, Special Agent of the Drug Enforcement Administration, United States Department of Justice, having been duly sworn, states as follows:

1.    I am a Special Agent (“SA”) of the Drug Enforcement Administration (“DEA”). I have served as a SA from January 2022 to present. I am currently assigned to the DEA New York Division (“NYD”) Buffalo District Office Tactical Diversion Squad (“TDS”). I am an investigator or law enforcement officer of the United States, within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations of, and to make arrests for, the offenses enumerated in Title 18, United States Code, Section 2516. During my career in law enforcement, I have attended numerous trainings directly related to criminal and narcotics investigations.

2.    During my time as a SA with DEA, I have received several hundred hours of comprehensive, formalized instructions on drug identification; money laundering techniques; patterns of drug trafficking; complex conspiracies; the exploitation of money launderers and

drug traffickers' telecommunications devices; surveillance; and other investigative techniques. I have also assisted in numerous investigations into the unlawful importation, manufacture, possession with intent to distribute, and distribution of controlled substances, the laundering of narcotics proceeds, and conspiracies associated with narcotics offenses. In conducting these investigations, I have used a variety of investigative techniques and resources, including surveillance, confidential sources, telephone toll analysis, and wire communications analysis in other Title III and New York wiretap investigations. As a result of this background, I am familiar with the activities of the criminal element within this community and how they tend to operate.

3. Through my training, experience, and conversations with more senior federal and state law enforcement investigators, I have become familiar with the methods used by narcotics traffickers to smuggle and safeguard narcotics, distribute narcotics, and collect and launder proceeds related to the sales of narcotics. I am particularly familiar with methods employed by large-scale narcotics organizations, and the sophisticated tactics that they routinely use in attempts to thwart the investigation of their narcotics organizations, including the use of cellular telephone technology, counter surveillance techniques, debit calling cards, public telephones, hidden vehicle compartments, smuggling schemes tied to legitimate businesses, false or fictitious identities, and coded communications and conversations.

4. This affidavit is being submitted for a limited purpose, that is, a probable cause determination, therefore I have not presented all the facts of this investigation to date. I have set forth only the information I believe to be necessary to establish probable cause. The facts



in this affidavit come from my personal observations, my training and experience, and information obtained from law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause and does not set forth all of my knowledge about this manner.

5. I make this affidavit in support of a criminal complaint charging **LEELADHAR H TANDEL, BARRY M WRIGHT and JESUS ANDON** with violating Title 21, United States Code, Section 846 (Conspiracy to distribute controlled substances) (the “Target Offense”).

## **II. PROBABLE CAUSE**

6. The Drug Enforcement Administration (“DEA”) Buffalo District Office (“BDO”) has been conducting a criminal investigation of an online entity “**MEDDZONLINE.COM**”, “**PHARMACYSTORESONLINE.COM**”, “**MEDSHEALTHONLINE.COM**”, “**PHARMACYHUBONLINE.COM**”, “**PHARMACYMEDSONLINE.COM**” and others unknown distributing controlled substances in the United States.

7. **MEDDZONLINE.COM** and related websites are online websites which are selling counterfeit pharmaceutical and controlled substances. The website has listed medications such as “Zoltrate 10mg”, “Tapentadol 100mg”, “Percocet 10mg” “Adderall 30mg”, “Alprazolam 1mg”, “Tramadol 100mg”, “Oxycodone 30mg”. Zolpidem Tartrate is a Schedule IV controlled substance. Tapentadol (Opioid) is a Schedule II controlled



substance. Percocet contains Oxycodone, a Schedule II controlled substance. Adderall contains Amphetamine/Dextroamphetamine, a Schedule II controlled substance. Alprazolam is a Schedule IV controlled substance. Tramadol is a Schedule IV controlled substance. These controlled substances are all listed for sale based on type of drug and quantity ordered.

8. Based on your Affiant training and experience, and information gleaned during the investigation, **MEDDZONLINE.COM** and related websites are believed to be part of a larger organized drug trafficking organization which operates domestically and internationally using similar versions of the same website under different domain names. After orders are received the organization sends a bulk shipment of drugs via international mail to a US based bulk re-shipper. The drugs received by the bulk re-shipper are then sent to smaller re-shippers who are responsible for shipping out the individual orders via USPS to customers. These smaller re-shippers are paid by the drug trafficking organization for each package they mail out to customers.

9. Members of the DEA Buffalo District Office TDS were notified by a Source of Information ("SOI") of an overdose in the Silver Creek, NY area around the end of February 2024. DEA BDO utilized various law enforcement databases to identify the victim ("Victim"). On or about February 28, 2024, the victim was admitted to UPMC Jamestown (New York). Your Affiant has learned through interviews and subpoenaed medical records, that the Victim was brought to the emergency room by family members. They found the Victim in her bedroom sitting on a plastic garbage bag naked and repeatedly saying the word,

“no.” Your Affiant learned that on or about November 12, 2023, the Victim purchased Ambien for \$769 and Tapentadol for \$519 and the money was sent via Western Union to a certain individual in Pakistan.

10. Your Affiant has also learned that a representative from **MEDDZONLINE.COM** and the Victim negotiated a price of \$1200 for the order. On or about November 16, 2023, a representative of **MEDDZONLINE.COM** sent USPS tracking number to the Victim confirming the package was sent to the Victim’s residence.

11. Through the review of records of the Victim, your Affiant observed 5 different transactions of similar nature as described above. The last transaction noted was on February 17, 2023, where the Victim purchased Valium, Ambien, and Tapentadol for \$2230.00. The Victim sent the money to a certain individual in Pakistan. This exchange shows the flow of money back to the head of the drug trafficking organization overseas in Pakistan even though the websites advertise the drugs as originating in the USA and shipping within the USA. Your Affiant believes that customers being directed to make payment via several different means is indicative of efforts to conceal and launder money transactions out of the view of law enforcement.

12. In furtherance of the investigation into the conspiracy to distribute controlled substances and to attempt to identify additional co-conspirators, the DEA Buffalo District Office has conducted several controlled purchases via the Target Websites operated by the head of the drug trafficking organization.

13. On or about November 20, 2024, an undercover purchase of 90 pills of Adderall 30mg, a Schedule II drug, was completed from **MEDSHEALTHONLINE.com**. Agents subsequently received a USPS parcel which contained the pills that were purchased. Analysis of the pills by the DEA Northeast Regional Laboratory indicated that the pills tested positive for Methamphetamine, a Schedule II controlled substance, and Ketamine, a Schedule III controlled substance.

14. On or about December 3, 2024, DEA Buffalo District Office conducted an undercover purchase of 90 Oxycodone M-30 pills, a Schedule II drug, from **MEDSHEALTHONLINE.com**. Agents subsequently received a USPS parcel which contained the pills that were purchased. Analysis of the pills by the DEA Northeast Regional Laboratory indicated that the pills tested positive for Dimethylamino Etonitazene, which is a Schedule I controlled substance analog that is structurally similar to known opioids.

15. On or about January 27, 2025, DEA Buffalo District Office conducted an undercover purchase of 90 Oxycodone M-30 pills, a Schedule II drug, from **MEDSHEALTHONLINE.com**. Agents subsequently received a USPS parcel which contained the pills that were purchased. Analysis of the pills by the DEA Northeast Regional Laboratory indicated that the pills tested positive for Fentanyl, a Schedule II controlled substance.



16. On or about April 1, 2025, DEA Buffalo District Office conducted an undercover purchase of 90 Oxycodone M-30 pills, a Schedule II drug, from **MEDSHEALTHONLINE.com**. Agents subsequently received a USPS parcel which contained the pills that were purchased. Analysis of the pills by the DEA Northeast Regional Laboratory indicated that the pills tested positive for Fentanyl.

17. On or about May 30, 2025, DEA Buffalo District Office conducted an undercover purchase of 90 Oxycodone M-30 pills, a Schedule II drug, from **MEDSHEALTHONLINE.com**. Agents subsequently received a USPS parcel which contained the pills that were purchased. Analysis of the pills by the DEA Northeast Regional Laboratory indicated that the pills tested as Acetaminophen.

18. On January 15, 2025, DEA Buffalo District Office obtained a search warrant for several Google accounts used in the operation of the Target Websites. The Honorable H. Kenneth Schroeder Jr, United States Magistrate Judge in the Western District of NY signed the warrant, *see* Case No. 25-mj-14. Upon review of the files received from Google, agents identified approximately 50 separate orders of Schedule II and Schedule IV drugs that were mailed out to customers located in the Western New York area.

**Co-conspirator 1 - LEELANDER H. TANDEL**

19. During or about the month of June 2024, the DEA Buffalo District Office (BDO) Tactical Diversion Squad (TDS) became aware of a target co-conspirator operating in

the Mobile, Alabama region named **LEELADHAR H TANDEL**. Law enforcement believes that **TANDEL** is a distributor of illegal controlled substances and/or counterfeit substances through the United States Postal Service.

20. During the investigation, law enforcement has learned that **LEELADHAR H TANDEL** was born in 1981 and is a resident of Alabama. **TANDEL** was previously arrested by U.S. Customs and Border Protection for being a Non-Immigrant Overstay and listed for Alien Removal. The charges were dropped on or about December 2, 2024.

21. During the investigation, on June 6, 2024, members of DEA Buffalo conducted an undercover purchase of drugs from an online website, **PHARMACYSTORESONLINE.com**, known to be operated by a foreign national head of an international drug trafficking organization. The purchase was for 60 pills of Zolpidem at a cost of \$489.60.

22. On June 10, 2024, DEA Buffalo was advised through correspondence from the website, that the package had a specific USPS tracking. Your Affiant then contacted USPIS Inspector Michael Reilly for assistance in attempting to identify any individuals tracking the package. Via USPIS searches Inspector Reilly was able to identify that the package originated out of the post office located in Summerdale, Alabama.

23. On June 17, 2024, DEA Buffalo responded to the undercover post office mailbox located in Buffalo, New York. Within the mailbox was a manila-colored parcel which was transported to the Buffalo District Office. Contained inside the parcel were six blister packs of Zolpidem. (See below photos)



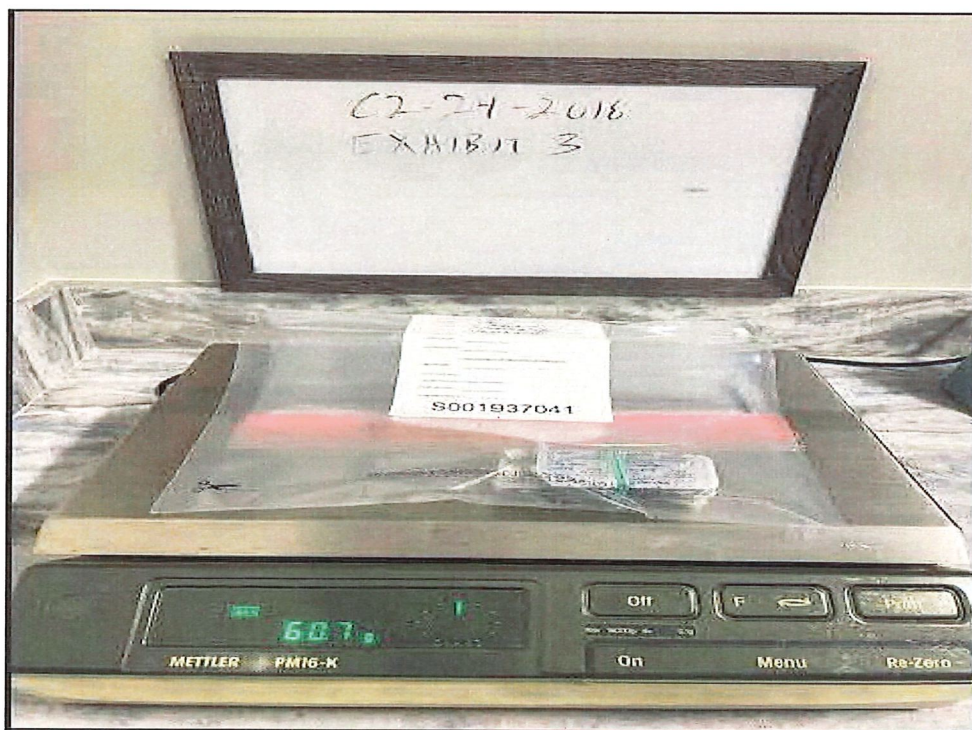
24. On or about July 11, 2024, the DEA Northeast Laboratory conducted a chemical analysis of the Zolpidem that was received on June 17, 2024. The analysis report for this exhibit confirmed that the substance was Zolpidem, a Schedule IV drug. Lab analysis of the exhibit seized on July 2, 2024, confirmed the substance as Clonazepam, a Schedule IV controlled substance.

25. In or about June 2024, your Affiant reached out to the DEA Mobile Resident Office for assistance in identifying the individual who mailed the parcel. Special Agent



James H. Joiner of DEA Mobile proceeded to reach out to the Postal Inspector who covered that region. Subsequently, Inspector Doug Wilson of the USPIS Houston Division called your Affiant and informed him of his awareness of suspected counterfeit drugs being mailed out of the Summerdale, Alabama post office. Inspector Wilson informed your Affiant that he was in the process of preparing to intercept a parcel the next time the unknown individual mailed out parcels from this post office.

26. On July 2, 2024, Inspector Wilson seized and obtained a search warrant for a USPS parcel/envelope that had been dropped off at the post office in Summerdale, AL on the same date. Inspector Wilson opened the package and found approximately 36 grams of suspected Clonazepam pills which were seized. Subsequently, Special Agent Joiner took possession of the pills on July 8, 2024. (See below photo)



27. On August 21, 2024, your Affiant sent a photo of TANDEL to Inspector Wilson in an attempt to confirm his identity as the individual mailing the parcels out of the Summerdale, AL post office. Inspector Wilson confirmed to your Affiant that the photo was a positive identification for the individual mailing the parcels.

28. On March 26, 2025, members of DEA Buffalo District Office, Mobile Resident Office and Omaha Division traveled to Raceway gas station located in Foley, Alabama to speak with TANDEL. Your Affiant, along with Special Agent Joiner and Special Agent Joshua Black interviewed TANDEL regarding the parcels that he had been mailing out at the post office. TANDEL informed the agents that he had been mailing out the parcels for a friend he had back in India. Additionally, he stated that he would receive boxes of blister packs that he would then mail out in parcels at the post office. While interviewing TANDEL, the agents observed packing materials and parcels matching the description of the parcel that was seized as well as the parcel received from the undercover purchase. Agents also observed a USPS box that was partially filled with a variety of blister packs which TANDEL turned over to Special Agent Joiner. The total seized consisted of 53 packs of suspected Carisoprodol tablets, 34 blister packs of suspected Alprazolam, 85 blister packs of suspected Clonazepam and 20 blister packs of suspected Metilfenidato.

29. On May 21, 2025, Inspector Wilson contacted Special Agent Joiner regarding a seizure of approximately 40 packages that had originated in Summerdale, AL which had previously been mailed out by TANDEL. Special Agent Joiner received the following totals for pills mailed out by TANDEL: 1,620 suspected Tramadol pills; 2,100 suspected Zolpidem

pills; 2,100 suspected Alprazolam pills; and 1,080 suspected Tapentadol pills. Subsequently, Special Agent Joiner forwarded the information regarding the seizure to your Affiant.

30. The pills seized by Inspector Wilson were turned over to the Mobile County Sheriff's Office for disposal. The breakdown of the packages was as follows: 9 parcels containing 1,620 suspected Tramadol pills; 14 parcels containing 2,100 suspected Zolpidem pills; 13 parcels containing 2,100 suspected Alprazolam pills; and 4 parcels containing 1,080 suspected Tapentadol pills. The packaging of pills in these parcels was indicative of shipments being mailed out to customers of the online websites that are operating. Furthermore, the labels on the parcels show the scope of customers spans the entire country and individuals such as **TANDEL** play a key role in aiding the foreign national head of the online websites to provide controlled substances to their customers in the USA.

**Co-conspirator 2 – BARRY M. WRIGHT**

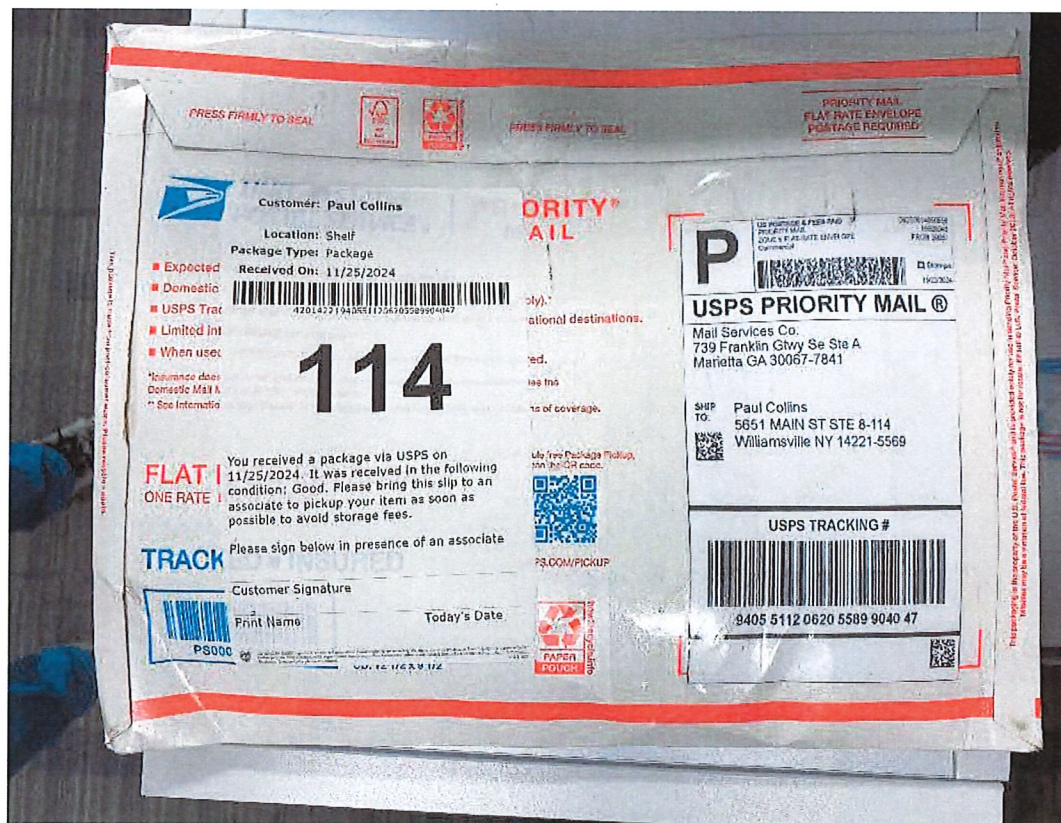
31. During the investigation, law enforcement has learned that **BARRY M WRIGHT** was born in 1969 and is a resident of Georgia. **WRIGHT** was previously arrested by the Atlanta Police Department for Aggravated Assault – Family Violence on March 13, 2015. The case was disposed of on March 15, 2015.

32. During the investigation, on November 20, 2024, members of DEA Buffalo conducted an undercover purchase of drugs from an online website, **MEDSHEALTHONLINE.com**, known to be operated by the head of an international drug trafficking organization. The purchase was for 60 pills of Zolpidem for \$475. On November



22, 2024, via correspondence from the website, DEA Buffalo was advised of the USPS tracking number for the Zolpidem. Your Affiant contacted USPIS for assistance in identifying who mailed this parcel out.

33. On November 27, 2024, members of DEA Buffalo responded to the undercover mailbox located in Buffalo, NY. Within the mailbox was a USPS parcel that contained blister packs of Zolpidem. (See below photos)





34. On or about December 18, 2024, the DEA Northeast Laboratory conducted a chemical analysis of the Zolpidem that had been received. The lab result indicated that it was inclusive as to what substance was in the pills.

35. On December 13, 2024, USPIS Inspector Michael Rosenberg contacted your Affiant to inform him that the individual who had mailed the pills from the undercover buy on November 20, 2024. The individual from postal databases and associated the Stamps.com account which paid for the postage was **BARRY M WRIGHT**. Additional postal searches indicated that **WRIGHT** was also the recipient of international packages from France and India, which the investigation knows to be countries the organization uses to mail pills through.



36. January 15, 2025, your Affiant obtained a signed search warrant from for one of the Google accounts used to operate the target websites, authorized by the Magistrate Judge H. Kenneth Schroeder Jr., the District Court for the Western District of New York. Within the files obtained from the search warrant was an Excel spreadsheet titled “BARRY & JENNIFER”.

37. Your Affiant reviewed this spreadsheet which showed that **WRIGHT** was working for the organization in the capacity of mailing out drugs to customers located around the United States. Your Affiant observed that **WRIGHT** was involved in mailing out various Schedule II and IV and received payment for his services, \$48.50/per package, after mailing out a varying number of packages. For the time period covering the spreadsheet, 7/21/24 – 1/14/25, your Affiant observed that **WRIGHT** mailed out a total of 333 parcels containing a variety of Schedule II and Schedule IV drugs to customers located across the USA. In addition, your Affiant observed that there were instances when **WRIGHT** is listed as taking drugs from his stock for himself. The tracking of stock, payments made to **WRIGHT** and the customers receiving pills shows that the operator of the online websites has direct control over every aspect of the business even from his location in Pakistan.

**Co-conspirator 3 – JESUS ANDON**

38. During the investigation, law enforcement has learned that **JESUS ANDON** was born in 1968 and is a resident of Missouri. **ANDON** does not have a criminal history.



39. On April 29, 2024, DEA St. Louis conducted a consensual interview of C.B., a practitioner located in St. Louis, MO who had been identified by your Affiant as a customer of the target websites. C.B. provided USPS packaging, including tracking numbers, which she had received Ambien pills that she had ordered from the websites.<sup>1</sup>

40. On August 22, 2024, DEA St. Louis contacted USPIS regarding the return address that had been found on the packaging that C.B. had provided which contained the Ambien pills that had been ordered. Postal searches of databases found that approximately 41 packages had been mailed out with that return address. Further review of records found a common individual in the area which led to the identification of a certain Missouri license plate. DMV records show that the vehicle is registered to **JESUS ANDON**. Surveillance of the area and comparison of the DMV photo for **ANDON** provided positive identification of **ANDON** as the individual mailing out drugs from St. Louis.

41. Your Affiant, through training and information obtained via multiple search warrants on target accounts used to operate the online websites, can confirm that it is customary practice to use a variety of re-shippers in different areas of the country. **ANDON**, via records obtained through search warrants, did mail out drugs to customers of the websites which is tangible proof that he was involved in actions in furthering the conspiracy.

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<sup>1</sup> Your Affiant is aware that Ambien contains zolpidem tartrate, a Schedule IV controlled substance.

WHEREFORE, based on the foregoing, your Affiant respectfully submits that probable cause exists to believe that **LEELADHAR. H TANDEL, BARRY M. WRIGHT** and **JESUS ANDON** violated Title 21, United States Code, Section 846 (conspiracy to possess with intent to distribute, and to distribute, controlled substances), and requests that a Criminal Complaint and Arrest Warrant as aforesaid is issued, and that this Complaint and Affidavit be sealed based on a continuing investigation and further Order of this Court.

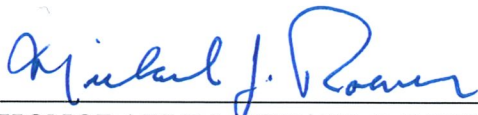
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JASON DOMENECH  
Special Agent  
Drug Enforcement Administration

Affidavit submitted electronically by e-mail in .pdf format. Oath administered, and contents and signatures attested to me as true and accurate telephonically pursuant to Fed R. Crim. P. 4.1 and 41(d)(3), 22<sup>nd</sup> day of July, 2025.



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HONORABLE MICHAEL J. ROEMER  
UNITED STATES MAGISTRATE JUDGE