

AO 91 (Rev. 11/11) Criminal Complaint

Redacted

UNITED STATES DISTRICT COURT

for the District of Oregon



Certified to be a true and correct copy of original filed in this District. Dated July 05 2017 By Deputy Clerk Mary L. Moran, Clerk of Court

United States of America v. Henry Konah Koffie, a.k.a. NARCOBOSS

Defendant(s)

'17-MJ-92

UNDER SEAL

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 May 2016 through July 3, 2017 in the county of Multnomah in the District of Oregon, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Row 1: 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 846, 952(a), and 963. The defendant knowingly, intentionally, and willfully conspired to unlawfully import, manufacture, distribute, and possess with the intent to distribute, and did distribute, furanylfentanyl, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and death and serious bodily injury resulted from the use of such substances, all in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 846, 952(a) and 963 (see the list of charges which is attached and fully incorporated by reference).

This criminal complaint is based on these facts:

See affidavit of HSI Special Agent Guy Gino, which is attached and incorporated fully by reference.

Continued on the attached sheet.

Sworn to via telephone pursuant to FRCP 4.1 [Signature]

Complainant's signature

Guy Gino, Special Agent, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/03/2017

[Signature: Paul Papak]

Judge's signature

City and state: Portland, Oregon

Hon. Paul Papak, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT for the DISTRICT OF OREGON

Criminal Complaint Charges

United States v. Henry Konah Koffie, a.k.a. NARCOBOSS

Count 1

(Conspiracy to import, manufacture, distribute, and possess with the intent to distribute a controlled substance)

UNDER SEAL

Beginning on or about May 2016, the exact date being unknown, and continuing through July 3, 2017, within the District of Oregon and elsewhere, defendant HENRY KONAH KOFFIE, a.k.a. NARCOBOSS, and others known and unknown, knowingly, intentionally, and willfully combined, conspired, confederated, and agreed to unlawfully import, manufacture, distribute, and possess with the intent to distribute furanylfentanyl, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and death and serious bodily injury resulted from the use of such substances, all in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 846, 952(a), and 963.

Count 2

(Distribution of a controlled substance resulting in death)

On or about May 1, 2017, within the District of Oregon and elsewhere, defendant HENRY KONAH KOFFIE, a.k.a. NARCOBOSS knowingly and intentionally distributed furanylfentanyl, a Schedule I controlled substance, and death resulted from the use of the furanylfentanyl by C.W., all in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

Count 3

(Distribution of a controlled substance resulting in death)

On or about May 19, 2017, within the District of Oregon and elsewhere, defendant HENRY KONAH KOFFIE, a.k.a. NARCOBOSS knowingly and intentionally distributed fentanyl, a Schedule II controlled substance, and death resulted from the use of the fentanyl by A.M., all in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

DISTRICT OF OREGON, ss:

AFFIDAVIT OF HSI AGENT GUY GINO

**Affidavit in Support of Criminal Complaint
and Application for an Arrest Warrant**

UNDER SEAL

I, Guy Gino, being first duly sworn, depose and say:

Introduction and Agent Background

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI) and have been so employed since 2003. I am a law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7) and I am authorized by law to conduct investigations and to make arrests for felony offenses. I am currently assigned to the Assistant Special Agent in Charge, Portland, Oregon. Prior to this, I was employed as a U.S. Border Patrol Agent and have been a federal law enforcement officer since September 1996. I am authorized and assigned to investigate violations of federal laws, including 21 U.S.C. §§ 841(a)(1), 846, 848, and 843(b) of the Drug Abuse Prevention and Control Act of 1970; that is, possession with intent to distribute and the distribution of controlled substances, conspiracy to commit such offenses, the operation of a continuing criminal enterprise, and the use of a communication facility to facilitate a felony violation of the Drug Abuse Prevention and Control Act of 1970. During my tenure as a federal law enforcement officer, I have investigated and/or participated in investigations of conspiracy, money laundering, narcotics trafficking, fraud, smuggling and theft. I have also acquired knowledge and information about the illegal drug trade and the various means and methods by which it is furthered including through the use of computers, smart phones, digital media and the Internet from formal and informal training, other law enforcement officers and investigators, informants, individuals I have arrested and/or interviewed, and from my participation in other investigations. I am currently detailed to the High Intensity Drug

Trafficking Area (HIDTA) Interdiction Taskforce (HIT) located at the Portland Police Bureau's Drugs and Vice Division in Portland, Oregon.

2. This affidavit is offered in support of a criminal complaint and arrest warrant for Henry Konah KOFFIE (hereinafter KOFFIE). Based upon the forgoing facts, I have probable cause to believe that:

- a. Beginning on or about May 2016, the exact date being unknown, and continuing through July 3, 2017, within the District of Oregon and elsewhere, KOFFIE, a.k.a. NARCOBOSS, and others known and unknown, knowingly, intentionally and willfully combined, conspired, confederated, and agreed to unlawfully import, manufacture, distribute, and possess with the intent to distribute furanylfentanyl, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and death and serious bodily injury resulted from the use of such substances, all in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 846, 952(a), and 963;
- b. On or about May 1, 2017, within the District of Oregon and elsewhere, KOFFIE, a.k.a. NARCOBOSS knowingly and intentionally distributed furanylfentanyl, a Schedule I controlled substance, and death resulted from the use of the furanylfentanyl by C.W., all in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C); and,
- c. On or about May 19, 2017, within the District of Oregon and elsewhere, KOFFIE, a.k.a. NARCOBOSS knowingly and intentionally distributed fentanyl, a Schedule II controlled substance, and death resulted from the

use of the fentanyl by A.M., all in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

Applicable Law

4. The Controlled Substances Act (CSA) is the statute establishing federal U.S. drug policy under which the manufacture, importation, possession, use and distribution of certain substances is regulated. N-Phenyl-N-[1-(2-phenylethyl)piperidin-4-yl]-furan-2-carboxamide, commonly known as furanylfentanyl or FUF (also referred to as furanyl fentanyl) is a schedule I “controlled substance” within the meaning of 21 U.S.C. § 802; N-phenyl-N-[1-(2-phenylethyl)-4piperidinyl] propanamide also known as fentanyl, is a schedule II “controlled substance” within the meaning of 21 U.S.C. § 802; and, fentanyl is a “Schedule II” controlled substance as defined by 21 U.S.C. § 812. Pursuant to 21 U.S.C. § 841(a)(1), (b)(1)(C), it is unlawful for any person to knowingly or intentionally manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance that results in death or serious bodily injury.

///

///

Statement of Probable Cause

5. On May 6, 2017, at approximately 1006 hours Portland Police Bureau uniform officers were dispatched to 3325 SE 29th Avenue, Portland, Oregon. C.W. had died from an apparent overdose. Officer Pagan, Officer Watts and Sergeant Bates responded to investigate the overdose death. Officer Watts and Sergeant Bates collected evidence while Officer Pagan interviewed the decedent's roommates. From the house, a laptop, cell phone, multiple drugs and paraphernalia were collected.

6. TFO Pagan first interviewed, Trevor Nicholas Souza who told Officer Pagan, that C.W. had been using fentanyl since approximately the New Year. I know that fentanyl is a Schedule II controlled substance. Souza told Officer Pagan that C.W. liked mixing alcohol, Xanax and fentanyl. Souza told Officer Pagan, C.W. was getting the fentanyl and the Xanax from the dark net site AlphaBay.

7. Officer Pagan then interviewed Shaun Min Bloodworth. Bloodworth told Officer Pagan, he and C.W. were ordering fentanyl over in Alpha Bay from a vendor who used the moniker NARCOBOSS. Bloodworth told Officer Pagan, NARCOBOSS advertised the fentanyl as pure "China White." Bloodworth told Officer Pagan, he and C.W. would usually split the cost of a gram of fentanyl but C.W. started ordering other drugs using his name Bloodworth told Officer Pagan, C.W. liked mixing drugs with alcohol. When Officer Pagan asked Bloodworth which drug C.W. had overdosed on, Bloodworth responded fentanyl. Bloodworth told Officer Pagan, he and C.W. had ordered a gram of fentanyl from NARCOBOSS for \$40 that arrived on May 4, 2017. Bloodworth told Officer Pagan, he was sure C.W. overdosed on that fentanyl because they had not completely consumed the gram they had ordered. The Oregon State Medical Examiner's Office subsequently informed us that C.W.'s cause of death was the result of furanyl

fentanyl and 4-ANPP intoxication.¹ Officer Pagan asked Shaun Min Bloodworth who ordered the drugs on the dark web. Bloodworth told Officer Pagan, C.W. ordered the drug using his name and they were shipped to their address. Bloodworth went on to tell Officer Pagan the drugs were sent USPS priority two day shipping envelopes. He told Officer Pagan, the envelopes were 8 ½” by 11”. Bloodworth told Officer Pagan the inside the large envelope was a plain, white letter envelope that contained the fentanyl in white powder form. Bloodworth told Officer Pagan the fentanyl NARCOBOSS sent was always sent from a Pennsylvania address. He told Officer Pagan, before they bought from NARCOBOSS they tried a fentanyl distributor from United Kingdom but only ordered once from that vendor because they were unhappy with the product. Bloodworth told Officer Pagan, they began ordering from NARCOBOSS approximately at the beginning of the year.

8. On May 9, 2017, TFO Macomber assisted Officer Pagan in reviewing the evidence from the overdose investigation associated to the overdose death of C.W. While reviewing digital evidence, TFO Macomber was able to log into the AlphaBay account associated to the username “six7keys”. Once logged into the site using C.W.’s credentials, he reviewed several areas of six7keys AlphaBay account and recorded the information. During the review, he noted several finalized and non-finalized orders.

9. I know that the dark net site AlphaBay operates like an escrow service between buyers and vendors. When a buyer places an order from a vendor’s page for a specific item the AlphaBay site will notify the vendor of the purchase and hold the cost of the item by removing the appropriate amount of bitcoin from the buyers account. AlphaBay will retain the bitcoin, in

¹ 4-ANPP (4-anilino-N-phenethyl-4-piperidine) is an intermediate precursor in the synthesis of fentanyl from N-phenethyl-4-piperidone (NPP). 4-ANPP is also an impurity found in fentanyl preparations.

escrow, until the seller “finalizes” the sale by notifying the AlphaBay site that the item was received. During the finalizing of an order the buyer is requested to leave feedback regarding the sale. If feedback is left it will automatically list item # and description of the sold item and will display the feedback in both the buyer’s and vendor’s AlphaBay profile pages.

10. Your affiant was made aware that TFO Macomber observed the following items: In the “Current Orders” folder – six7keys had a 100mg order for “etizolam” that was marked “shipped” with a reference date of May 3, 2017. This sale was from the vendor “dankcity”. The order had not been finalized yet.

11. In the “Archived Orders” folder, there were several listings. Amongst the listings there was a finalized transaction for “1 Gram China White Synthetic Heroin Fentanyl Mix \$40 per gram” The listing was date stamped April 29, 2017, and purchased from the vendor “NARCOBOSS”.

12. On May 12, 2017, US Postal Inspection Service (USPIS) Inspector Adam Sale informed that he had conducted queries into priority mail shipments received at 3325 SE 29th Avenue, Portland, Oregon. Inspector Sale stated that he identified that a priority mail parcel bearing tracking # 9205 5901 6491 7363 4945 84 was delivered to 3325 SE 29th Avenue, Portland, Oregon on May 4, 2017. Inspector Sale advised that the parcel’s postage was purchased on May 1, 2017, and it was first scanned by the US Postal Service on May 1, 2017, at 23:34 EDT at the Philadelphia Network Distribution Center (NDC), 1900 Byberry Rd, Ste. 1, Philadelphia, PA 19116. Inspector Sale also stated that the parcel was addressed to: Shaun Bloodworth and sent from: Mike James, 940 Market Street, Philadelphia, PA 19107.

13. On May 12, 2017, SA Gino reviewed the images TFO Macomber captured of the NARCOBOSS vendor account. I immediately noticed that NARCOBOSS used a Mexican

booking photo of Joaquin "Chapo" Guzman as a profile picture. The NARCOBOSS user profile page displayed that the vendor account has been active since July 7, 2016, and had 5,260 completed transactions. I also observed that on the profile page NARCOBOSS had a message stating, "I'm taking a short break until Saturday May 6, 2017. If you've ordered and your shipment is marked shipped, then it's in the mail." As I reviewed the AlphaBay NARCOBOSS store page I observed that it had 3 current listings available:

- 1 Gram China White Synthetic Heroin Fentanyl Mix \$40 Per Gram UPDATED LISTING (40-5-2017) <<HOT ITEM>>(#4 Heroin Substitute) USA ONLY.
- 7 Grams China White Synthetic Heroin Fentanyl Mix \$40 Per Gram UPDATED LISTING (40-5-2017) <<HOT ITEM>>(#4 Heroin Substitute) USA ONLY.
- 28 Grams China White Synthetic Heroin Fentanyl Mix \$40 Per Gram UPDATED LISTING (40-5-2017) <<HOT ITEM>>(#4 Heroin Substitute) USA ONLY.

14. On May 25, 2017, TFO Macomber initiated an undercover purchase of 1 gram of fentanyl from the AlphaBay vendor NARCOBOSS. TFO Macomber provided a US government controlled undercover address to NARCOBOSS using AlphaBay's messaging system.

15. On May 29, 2017, Portland Police Bureau (PPB) Drugs and Vice Division (DVD) officers were called to the scene of a reported drug overdose at the address 5249 NE 45th Place, Portland, Oregon. Officers on scene called out investigators from PPB/DVD due to their assessment that the death appeared to be caused by an accidental drug overdose. PPB/DVD and HSI Task Force Officers (TFO) Sean Macomber and Freddie Jackson responded to the address and spoke to PPB Officer Straub (the primary officer for the call). Officer Straub informed that he had interviewed the individuals present and that the deceased individual, who he identified as A.M., had been found by a roommate. Officer Straub further stated that one of the roommates

had information that A.M. had purchased narcotics on the internet and had a history of using narcotics including heroin. Officer Straub also showed the TFOs a text message that the roommate had said came from A.M. the previous week. In the text message, TFO Macomber observed that A.M. told Adams that he had obtained a new opioid that only required dosages of .005 grams. TFO Macomber noted that the text message had been sent on May 21, 2017.

16. TFO Macomber spoke with Brandon Adams, who was identified as A.M.'s roommate. Adams told TFO Macomber that A.M. had been "clean" for approximately the past six months and that he had only recently started using drugs again. Adams stated that he personally did not know how to purchase illegal drugs on the internet, but that A.M. did.

17. TFOs Macomber and Jackson entered the residence, where they spoke with the Medical Examiner (ME) who was already on scene. The ME stated that they had waited to examine the scene until TFO Macomber and his partner had arrived. TFO Macomber entered the room where the deceased was located, and noted that he was laying on a bed, leaning on his left side.

18. TFOs Macomber and Jackson proceeded to search the deceased room, where TFO Macomber recovered a black notebook on a desk. Upon reviewing the contents, he observed what appeared to have mnemonic seeds written on one of the back pages. He observed what appeared to him to be a seed recovery for the dark net site AlphaBay as well as a bitcoin wallet.

19. TFOs Macomber also located a black plastic box container on a bookshelf. Upon opening the box, he observed an off-white powder consistent with opioids sold via the dark net.

20. Investigators conducted a search of the room that the roommates identified as belonging to the deceased. During the search, investigators located a laptop computer and also noted that there was no garbage can in the room. TFO Macomber asked the roommates where

A.M. would throw away his garbage and they indicated he would most likely use the bathroom or kitchen garbage cans. TFO Macomber then searched the garbage cans that were located in the bathroom and kitchen and did not find anything of note. TFO Macomber further asked Adams when the last trash pickup was and he indicated that the house trash had not been picked up since before May 21, 2017 (This was the date that the text message that was sent from A.M. regarding the new drug he had obtained). TFO Macomber went to the trashcan located outside the house and searched for items of evidence. In the trash can he found a USPS priority mail envelope addressed to Leo Miller. He noted that the return address listed was from Philadelphia, Pennsylvania. It was noted that the postage label had a shipping date stamped May 19, 2017. The envelope was seized and placed into property. The laptop from A.M.'s room along with other computers that the roommates identified as belonging to A.M. were taken as evidence for later examination.

21. The Oregon State Medical Examiner's Office subsequently informed the Portland Police case officers that the cause of death has not yet been determined, but that toxicology tests revealed the presence of an unknown fentanyl analogue and cannabinoids in A.M.'s system.

22. On June 2, 2017, US Postal Inspection Service (USPIS) Adam Sale notified investigators that an envelope had arrived at the government-controlled address. USPIS brought the parcel bearing tracking # 9205590164917368399747 to the Portland Police Drugs and Vice Division and transferred custody of the parcel envelope to TFO Pagan. TFOs Macomber and Pagan processed the parcel for evidence. During this time, TFO Macomber noted the return address on the package was:

Garcy Lane
940 Market Street
Philadelphia PA 19107

23. TFO Macomber recognized that the envelope return address listed the same street address as the postage label found on May 29, 2017, at the crime scene of A.M.'s death.

24. On June 8, 2017, after PPB Computer Forensics Officer Sparling completed the forensic imaging of the laptop computer identified as A.M.'s. TFO Macomber was able to review the imaged hard drive and located three public "PGP" encryption keys. These public PGP keys were saved on the desktop as text files. The public keys were identified as belonging to associated usernames: TheDeadPoet, NARCOBOSS, and Svnslick. The forensic review also yielded several Google searches had been performed on the name NARCOBOSS and a saved draft message that had been addressed to NARCOBOSS@sigaint.org.

25. TFO Macomber also noted that there were photos saved within the computer files that he recognized as mnemonic recovery seeds for the dark net website AlphaBay.

26. On June 12, 2017, USPIS Inspector Adam Sale advised that he had conducted queries into priority mail shipments received at 5249 NE 45th Pl., Portland, Oregon. Inspector Sale stated that he identified that a priority mail parcel bearing tracking # 9205 5901 6491 7367 1528 79 was delivered to 5249 NE 45th Pl., Portland, Oregon on May 22, 2017.

27. Inspector Sale informed investigators that the parcel's postage was purchased on May 19, 2017 and it was first scanned by the US Postal Service on May 19, 2017, at 23:04 EDT at the Philadelphia Network Distribution Center (NDC), 1900 Byberry Rd, Ste. 1, Philadelphia, PA 19116. Inspector Sale also informed that the parcel was addressed to: Leo Miller and sent from: Mike James, 940 Market Street, Philadelphia, PA 19107.

28. During this investigation, your affiant became aware of an investigation being conducted by The United States Postal Inspection Service, the Federal Bureau of Investigation ("FBI"),

and HSI Pittsburgh in the Western District of Pennsylvania who are engaged in an undercover investigation of the vendor NARCOBOSS from AlphaBay.

29. I was informed that these law enforcement agencies in the Western District of Pennsylvania have made a number of undercover purchases on AlphaBay from the vendor NARCOBOSS.

30. One such undercover purchase occurred on May 11, 2017. On that date, law enforcement in the Western District of Pennsylvania used an undercover AlphaBay account to purchase 7 grams of "China white synthetic heroin fentanyl mix" from NARCOBOSS's AlphaBay vendor account. Law enforcement used Bitcoins to effectuate this purchase and provided "Mike Wilson" as the recipient name and provided an undercover address to receive this product.

31. On May 17, 2017, U.S. Postal Inspectors retrieved, from the undercover address, a Priority Mail Express parcel addressed to Mike Wilson that weighed approximately 2 ounces. The parcel had a return address of Garcy Lane, 909 Chestnut St, Philadelphia, PA 19107. An account with an online postage company was used to pay the postage for this Priority Mail Express parcel.

32. The Priority Mail Express parcel was transported back to the USPIS field office in Pittsburgh, PA, where it was opened and photographically documented. Inside the parcel was a sealed white letter sized envelope. The white envelope was opened and found to contain a clear zipper plastic bag. The plastic bag was found to contain approximately 10 grams of a fine white powder.

33. The white powder was submitted to the USPIS forensic laboratory for chemical analysis. The laboratory's chemical analysis determined the white powder weighed approximately 11 grams and was found to contain furanyl fentanyl, a schedule I controlled substance.

34. During this investigation, HSI Portland investigators became aware of another investigation being conducted by HSI Grand Forks and the Grand Forks Narcotics Task Force (GFNTF) regarding non-fatal overdoses of several individuals in Grand Forks, North Dakota.

35. Your affiant learned from HSI Grand Forks Special Agent Jeremy Grube that on April 26, 2017, HSI Grand Forks agents and members of the GFNTF conducted multiple enforcement operations in the Grand Forks, ND, area related a drug overdose that occurred during the early morning hours of April 26, 2017. Agents learned that Anjelique WILSON's boyfriend, [REDACTED], ingested and later overdosed on a substance believed to be fentanyl, and was admitted to Altru Hospital.

36. On April 26, 2017, agents encountered Anjelique WILSON and discovered that WILSON was in possession of a controlled substance believed to be fentanyl. Agents learned that WILSON had been in recent contact with Blake HOLIEN, related to the drug overdose that occurred during the early morning hours of April 26, 2017. WILSON was later arrested on state drug charges.

37. Continuing on April 26, 2017, agents encountered Blake HOLIEN at his residence in Grand Forks, ND. Agents interviewed HOLIEN and HOLIEN admitted to his role in the distribution of fentanyl. HOLIEN admitted that he was responsible for purchasing fentanyl from NARCOBOSS, a dark net vendor on ALPHABAY, for an extended period of time. Agents conducted a search of HOLIEN's bedroom and discovered narcotics, narcotics paraphernalia, US Postal Service mail packaging, and additional items of interest. Agents learned HOLIEN was linked to the drug overdose that occurred during the early morning hours of April 26, 2017. HOLIEN was subsequently arrested on state drug charges.

38. HOLIEN informed agents that he received a couple points of fentanyl from Jereme SORTEBERG in the early morning hours of April 26, 2017, and later provided WILSON with a portion of the fentanyl. HOLIEN stated he was in recent contact with SORTEBERG and believed he had more fentanyl and/or additional narcotics. Agents conducted a brief operation with HOLIEN's consent and arranged a meeting to receive additional narcotics from SORTEBERG. SORTEBERG arrived at the meet location and was detained by investigators. Agents discovered SORTEBERG was in possession of narcotics and narcotics paraphernalia. SORTEBERG was interviewed and admitted to providing HOLIEN with fentanyl in the early morning hours of April 26, 2017. SORTEBERG further stated he received the fentanyl from [REDACTED] of Grand Forks, ND. SORTEBERG believed that [REDACTED] and HOLIEN worked together to obtain grams of fentanyl from a dark net vendor. SORTEBERG drove agents past [REDACTED]'s residence located at 1820 17th St S, Grand Forks, ND. SORTEBERG was later arrested on state drug charges.

39. On April 26, 2017, agents went to [REDACTED] residence and made contact with [REDACTED]. [REDACTED] invited agents into his residence and informed agents that his son, [REDACTED] was "strung out" on narcotics and currently in his bedroom. [REDACTED] escorted agents to [REDACTED] bedroom where agents discovered [REDACTED] disorientated, visibly under the influence of an unknown substance, and partially unresponsive. Agents contacted Emergency Medical Services and [REDACTED] was later transported to Altru Hospital in Grand Forks, ND.

40. Agents discovered a large amount of narcotics paraphernalia and narcotics residue in plain view in [REDACTED] bedroom. [REDACTED] parents consented to a search of the room

and agents removed the paraphernalia, narcotics residue, and additional items of interest from the bedroom.

41. In June 2017, the North Dakota Crime Laboratory confirmed that the substance discovered on [REDACTED] person on April 26, 2017, was in fact Furanylfentanyl, a schedule I controlled substance. WILSON was later interviewed and confirmed that Blake HOLIEN provided her with fentanyl, which was later used by her boyfriend, [REDACTED]. Shortly after using the substance, WILSON noted [REDACTED] was unresponsive and contacted Emergency Medical Services.

42. In June 2017, Altru Health System provided agents with medical records for [REDACTED] related to the incident, which occurred on April 26, 2017. Medical records revealed that [REDACTED] informed emergency medical services that he was smoking fentanyl and lost consciousness after using the substance. Prior to being admitted into the hospital, emergency medical services provided [REDACTED] with Naloxone IV to treat the initial symptoms and after receiving the Naloxone IV [REDACTED] condition rapidly improved.

43. Medical personnel observed [REDACTED] for a period of time in the hospital and [REDACTED] was later released without further incident. The medical doctor noted in medical reports that "Opiate Overdose" was his impression as to the cause of [REDACTED] recent need for medical treatment.

44. During this investigation into the dark net vending activities of NARCOBOSS, I recalled a prior investigation he conducted with the Portland Police Bureau regarding the non-fatal overdose from fentanyl of a Portland State University student in May 2016. I recall there were several similarities between that investigation and this investigation.

45. The May 2016 investigation identified the AlphaBay dark net vendor DNMKINGPIN as the source of the fentanyl. During that investigation, the profile picture used for DNMKINGPIN was the same Mexican booking photo of Joaquin "Chapo" Guzman that NARCOBOSS utilized as his profile picture.

46. During the DNMKINGPIN investigation, agents were able to retrieve the package in which the fentanyl was received. The priority envelope had a handwritten shipping label which listed a return address of "210 Walnut Street, Darby, PA". Darby, Pennsylvania is a suburb of Philadelphia, Pennsylvania.

47. Investigators were not able to conduct any undercover purchases due to the fact that AlphaBay banned the DNMKINGPIN account at the end of June of 2016. NARCOBOSS's AlphaBay account was established on July 7, 2016. DNMKINGPIN was selling China White Heroin for \$40. It was widely speculated that DNMKINGPIN was banned from the site for advertising the wrong product. This is well documented throughout DNMKINGPIN's negative feedback page. This is proven from the Portland State University student's overdose where that substance was identified as fentanyl. The new NARCOBOSS listing sells "China White Fentanyl Heroin Mix" for \$40 per gram.

48. I noticed that both public GPG² keys provided on both vendors' (DNMKINGPIN and NARCOBOSS) public facing AlphaBay profiles list the same outdated version of "GnuPG key" which is v1.4.12 (MingW32). I know that this version of encryption was last updated on 01-30-2012. The current version of GnuPG key is v2.1.21 and I know has been updated dozens of times. It should be noted that the outdated version of the GnuPG key is consistent between the

² Gnu Privacy Guard -- also referred to as GPG data encryption and decryption is used for transferring and storing information securely. Messages are signed, encrypted and decrypted with keys.

public key displayed on DNMKINGPIN profile page and the public GPG key being used by NARCOBOSS. This leads investigators to believe that the same individual set up the DNMKINGPIN and NARCOBOSS AlphaBay vendor accounts.

49. On June 26, 2017, SA Gino logged onto the AlphaBay site and reviewed the positive feedback page on NARCOBOSS's vendor page. SA Gino observed a comment from a customer posted on November 14, 2016, regarding a purchase of 1 Gram of fentanyl heroin mix. The customer posted "always quick and wonderful value! Been using him since he was *****pin, and nothings changed. happy customer :) ". I believe "*****pin" was referencing DNMKINGPIN.

50. On that same day, I observed a dark net market forum conversation between two users. The exchange was one user asking the other user advice on what to do since they had not received an order on time.

USER1: "Idk about overnight , unless that was the original shipping method. but it couldn't hurt to talk to the vendor about it. Fair warning though, your address could be burned, if it was confiscated because of controlled substances."

USER2: "Ugh, I hope not. Idk how would they find it. This guy has shipped thousands of orders and none but mine have not come in a timely manner."

USER 1: "What vendor ?"

USER2: "DNMKINGPIN/NARCOBOSS on AlphaBay It was a domestic shipment so they dont even xray those, do they?"

51. June 26, 2017, HSI Portland Intelligence Research Specialist (IRS) Biundo conducted DHS database queries on all imports from China destined for the greater Philadelphia region. IRS Biundo focusing on individuals who received import shipments from prior

companies that HSI and Customs and Border Protection (CBP) has tied to being fentanyl suppliers.

52. As a result of these queries, IRS Biundo identified that between April 6, 2016 and May 23, 2017, Henry KOFFIE had 14 imports addressed to him that originated from China and Hong Kong to "300 Berbro Street, Darby, PA 19023". Your affiant is aware that "300 Berbro Street, Darby, PA 19023" is KOFFIE's mother's residence. Further research revealed that KOFFIE's Pennsylvania driver's license lists his residence as "300 Berbro St, Darby, PA, 19023".

53. Investigators conducted a review of these imports and learned that their descriptions were transmitted to US Customs and Border Protection (CBP) by the shipper. These imports were manifested as "HEADWEAR", "SHIRT", "ACCESSORIES", "TONER", "THE DRILLING HEAD", "CABLE", "GIFT X1, and "COMMERCIAL SAMPLES". The China and Hong Kong based shipping agents MDD, Digital Partner, TY5, ZXF, Wenfeng He, have all been shipping agents on parcels seized by CBP that contained fentanyl.

54. On October 6, 2016, two (2) parcels were shipped by Digital Partner, and destined to "Henry KOFFIE" at "300 Berbro Street, Darby, PA 19023". Both were manifested as "CABLE" with weights 0.609kg and 0.602kg. Your affiant is aware that the shipping agent "Digital Partner" has numerous parcels seized by CBP, which contained fentanyl.

55. On October 25, 2016, HSI Nashville, TN received information from the CBP Miami Tactical Analytical Unit about a potential inbound narcotics being shipped from Digital Partner in China to a recipient in Nashville, TN. On November 4, 2016, US Postal Inspectors detained the parcel and HSI Agents performed an extended border search on the parcel. Inside

the parcel, agents located 500 grams of an unknown white powder. All field tests that were conducted were inconclusive.

56. On November 8, 2016, the substance was analyzed by the DEA Lab and confirmed the substance to be fentanyl.

57. On February 21, 2017, four (4) parcels were shipped by "Mudidi Logistics Limited" (MDD) in Hong Kong to "Henry KOFFIE 300 Berbo Street, Darby, PA 19023". All four packages were manifested as "GIFT X1" with weights 0.613kg, 0.579kg, 0.614kg and 0.593kg respectively.

58. I know that in March 2017, Mudidi Logistics Limited (MDD) was identified by CBP and HSI as a shipping agent moving illicit parcels of contraband that were purchased openly on the internet and as a result a joint operation between US and Hong Kong Customs. In April 2017, Hong Kong Customs, at the request of HSI Hong Kong, conducted an operation to examine packages shipped by Hong Kong based shipper MDD. The operation resulted in the seizure of 300 packages in Hong Kong, all of which contained controlled substances, to include fentanyl. Additionally, more than 170 packages were targeted during shipment to the U.S. by the National Targeting Center-Investigations (NTC-I) and the United States Postal Inspection Service (USPIS). All of the packages that were examined contained controlled substances. Following this operation, Mudidi Logistics Limited shipments virtually stopped; however, the National Targeting Center targeting team observed an uptick in TY5 shipping.

59. On May 18, 2017, two (2) parcels were shipped by TY5 from China to "Henry KOFFIE, 300 Berbro Street, Darby, PA 19023". Both parcels were manifested as "COMMERCIAL SAMPLE" with weights 0.345kg and 0.346kg each. A review of records revealed that both of these packages were destined to the above address.

60. On May 18, 2017, one of the parcels shipped by TY5, and manifested as "COMMERCIAL SAMPLE" weighing 0.345kg was seized by CBP. The initial exam revealed a powdery substance, consistent with fentanyl. The powder is currently ta the CBP lab awaiting analysis results. The other parcel was delivered.

61. On May 25, 2017, one parcel shipped by ZXF, entered the U.S. manifested as "COMMERCIAL SAMPLE" weighing .356 KG. The package destined to Henry KOFFIE at 300 Berbro Street, Darby, PA 19023 was seized by CBP after an exam identified a powdery substance, consistent with fentanyl. The powder is at the CBP lab awaiting analysis.'

62. Your affiant was informed that on May 31, 2017, HSI Houston Airport Border Enforcement Security Task Force (BEST) group was contacted by USPIS who interdicted an international air mail package suspected of containing fentanyl. The parcel was being shipped by "TY5" from Shanghai, China and addressed to a consignee in Katy, Texas. HSI and USPIS transported the package to the CBP Laboratory and Scientific Services (LSS) facility in Houston, Texas where an extended border search of the package was conducted. A white, powdery substance was found inside the package and a sample was determined through a preliminary analysis that the substance was Furanyl fentanyl. The contents of the package were determined to have an estimated weight of 102.47 grams including the plastic pouch prior to the sample being removed.

63. Not including the two recent seizures, the total weight of the packages that have been shipped to Henry KOFFIE at 300 Berbro Street, Darby, PA 19023 is 7.001kg.

64. On June 26, 2017, investigators observed that NARCOBOSS' vendor page did not have any listings. Furthermore, NARCOBOSS had posted a message stating, "I am not retired. I'll be back in the middle of July. - Narco". Your affiant believes that the two seizures by

CBP of packages destined for KOFFIE, has caused his supply to dwindle and causing him to have to wait on a reshipment.

65. Further investigation by IRS Biundo identified that between September 15, 2016 and February 13, 2017, Henry KOFFIE received from China and Great Britain five (5) imports indicative of manufacturing narcotics to his residence at 216 Walnut Street 2nd Floor, Darby, PA 19023. Manifested descriptions of these imports transmitted to US Customs and Border Protection (CBP) by the shipper were submitted as “microcrystalline cellulose”, “dust catcher”, “fan sample”, “drill press machine”, and “electrical box”.

66. Based on your affiant's training and experience, I believe that the mechanical items received by KOFFIE are all essential items to build a “pill press”. Your affiant knows that having a commercial grade pill pressed shipped to a residential address is highly unusual and suspicious. To avoid suspicion and detection, the individuals involved will have the “press” shipped in pieces, and then assembled on-site.

67. Additionally, your affiant is aware that “microcrystalline cellulose” is a compound used as a “binding agent” during the manufacturing of pharmaceuticals. It also known from experience in other fentanyl investigations that the other manifested items (“dust catcher”, “fan sample”, “drill press machine”, and “electrical box”) in conjunction with the importation of microcrystalline cellulose is indicative of counterfeit prescription pill manufacturing operations.

68. On June 27, 2017, HSI Portland served administrative subpoenas to several digital currency exchangers requesting any information on any digital exchange accounts belonging to Henry KOFFIE. I received a response from Coinbase, Inc. who informed that KOFFIE was a past account holder for account 53335e705bcd912fec000e32. Coinbase explained that KOFFIE's digital currency account was cancelled by Coinbase's compliance unit after it was

determined that KOFFIE's account had received a high volume of bitcoin from the dark net site AlphaBay.

69. Your affiant reviewed the account information including all transaction history provided to HSI Portland by Coinbase. I observed that KOFFIE's account, which was established on March 26, 2014, and shut down on September 28, 2016. KOFFIE provided phone number (267) 271-0655 and listed his address as 300 Berbro Street, Darby, PA 19023 as his address. KOFFIE also provided a photo of his Pennsylvania issued driver's license as proof of identity and residence.

70. Investigators conducted a review of all financial data during the life of the account showed that it had transacted a total of 341.7792077 bitcoin (btc). These transactions consisted of the account receiving 289.7967607btc and sending 51.98244699 btc to external bitcoin addresses. The review also showed that KOFFIE had purchased 3.15583052 BTC which at the time of purchase had the USD equivalent of \$760 and that KOFFIE sold 240.9701443 BTC. From that 240.9701443 BTC for which KOFFIE received \$127,282.77 which was subsequently wired into a TD Bank Account ending in x2546 and his Greendot Bank account ending in x3300.

71. IRS Biundo was able to identify several social media platforms with which KOFFIE had accounts. KOFFIE was identified as Facebook user "Moneybags215" at WWW.facebook.com/moneybags215. A review of that site shows KOFFIE set the name to appear as Henry KOFFIE, which has numerous photos of KOFFIE, who your affiant recognized from the photo of his driver license (which he supplied to Coinbase Inc.). Specifically the photos posted to KOFFIE's profile show him holding stacks of US currency.

72. Further investigation revealed that KOFFIE uses the moniker "COUNTSTACKULA" as his handle on "Twitter." I and other investigators reviewed his

postings on the COUNTSTACKULA twitter account. I observed a February 2017 post, which included an Instagram photo. The post stated, "No clubbing for me tonight. Work, work, work, work, work, work, work...." The linked Instagram photo is of two computers, one black laptop, and one silver Apple MacBook. A closer examination of the Apple mac Book's screen shows the icon for the "The Onion Router Browser" aka the "Tor" browser. I know that the Tor browser allows a computer to access the Tor or "The Onion Router" and all sites that end in the suffix ".onion" instead of .net or .com. You affiant is aware that that a person needs Tor software to access the dark net site AlphaBay.

73. In reviewing KOFFIE's COUNTSTACKULA Twitter account's public facing postings, I discovered a May 4, 2017, post that Twitter's geolocation stated that KOFFIE was in Miami Beach, Fl. The picture was KOFFIE sitting on a jet ski with the comment "CountStack in Miami!!!!"

74. You affiant observed that on May 5, 2016, there was a post of picture of KOFFIE holding 25 stacks of light blue banded US currency, inside what appears to be a night club. KOFFIE commented on the post "Last night in Miami. So we "did the usual".

75. Your affiant also observed that on May 5, 2017, KOFFIE posts another picture of himself, this time inside the first class cabin of an airplane. The geolocation setting on Twitter stated he was located at the Miami International airport. The post stated, "I just got a text and it said, "H, the hood miss you." So I said, I'm in my way" (we're on our way back)".

76. As referenced earlier, on May 12, 2017, I reviewed the images TFO Macomber captured of the NARCOBOSS vendor account. During that review, I noted that on the profile page NARCOBOSS had a message stating, "I'm taking a short break until Saturday May 6, 2017. If you've ordered and your shipment is marked shipped, then it's in the mail."

77. Your affiant continued to review the COUNTSTACKULA twitter account and noticed that he also posted photos of a trip he took to Phoenix posted on December 2, 2016. The photo is of him holding a boarding pass on American Airlines with a caption stating, "I'll be in Phoenix for the weekend. Try not to miss me too much. Holla". I reviewed feedback for the vendor profile of NARCOBOSS on Alphabay and noticed that on the site there were comments dated December 2, 2016 and then no further feedback until December 6, 2016. Your affiant believes that the lapse in comments was because NARCOBOSS was "away" and not filling and sending out orders.

78. On June 27, 2017, your affiant served an HSI Administrative subpoena to AT&T requesting subscriber and toll data on (267) 271-0655 which was the phone number KOFFIE had supplied to Coinbase, Inc. as well as listing on his passport application. AT&T responded that subscriber for (267) 271-0655 is Henry KOFFIE with a billing address of 300 Berbro St, Collingdale, PA 19023; IMSI 310150902122988 with a service start date of 08/05/2014. Your affiant knows that "Collingdale" and "Darby" are the same town in Pennsylvania as indicated by same postal zip code.

79. A search of DHS/HSI indices revealed that KOFFIE had applied for and received a United States passport (#556390897). Your affiant personally reviewed that handwritten passport application that KOFFIE submitted in order to obtain his passport. Your affiant was also provided a copy of the handwritten shipping label, which was recovered by the Portland Police Bureau following the investigation of the non-fatal overdose in May 2016.

80. The investigation into that overdose revealed that the parcel containing fentanyl was ordered from AlphaBay vendor DNMKINGPIN. Your affiant has previously provided probable cause to establish that KOFFIE operates or has operated as a dark net vendor under the

monikers "DMNKINGPIN" and "NARCOBOSS". A side-by-side comparison of the handwritten United States passport application, submitted by KOFFIE and the handwritten shipping label, sent by DNMKINGPIN, revealed strikingly similar handwriting.

81. On June 27, 2017, Homeland Security Investigations initiated surveillance in the area of 216 Walnut Street, Darby, PA (the residence of KOFFIE). HSI surveillance agents observed KOFFIE, wearing a teal shirt and dark pants exit 216 Walnut Street with a "Gucci bag" shopping bag and a suitcase. Agents observed KOFFIE approach a newer model Chevy Tahoe bearing Pennsylvania license plate "KKF 4165" (registered to "Henry Koffie, 300 Berbo Street, Darby, PA). KOFFIE is seen accessing the rear cargo area of the Tahoe and placed the "Gucci bag" and luggage into the rear cargo area of the vehicle.

82. Agents observed as KOFFIE got into the driver's seat of the Tahoe and departed the area.

83. Surveillance agents followed the Tahoe, operated by KOFFIE, as it traveled to the Home Depot store located at 4640 Roosevelt Boulevard, Philadelphia, PA. Surveillance observed KOFFIE exit the vehicle and enter the Home Depot. A short time later, surveillance agents observed KOFFIE exit Home Depot with a small plastic bag and re-enter the driver's seat of the Tahoe and depart the area. Agents followed the Tahoe, operated by KOFFIE, to the 4900 block of Lawrence Street in Philadelphia. The Tahoe is observed parked on Lawrence Street, with KOFFIE sitting in the driver's seat. A white Toyota Camry bearing Pennsylvania registration "JWN 4962" (registered to "Nassim Haquouam, 4.5 West Ruscomb Street, Philadelphia, PA) is observed park directly in front of the Tahoe. A male, with a beard, exited the Toyota Camry and approached the driver's window of the Tahoe. Surveillance agents observed as the male exchange something with KOFFIE and then return to the Camry and

KOFFIE then departed the area of Lawrence Street in the Tahoe. A review of Haquouam's Pennsylvania driver's license by surveillance agents, confirmed that the male that met with KOFFIE, was Haquouam.

84. Surveillance agents followed KOFFIE as he traveled into the state of Delaware, ultimately stopping at 205 Thorton Street, Dover, DE. KOFFIE exited the Tahoe and removed the "Gucci" paper bag and luggage from the cargo area and entered the front door of 205 Thorton Street, without a key. Consumer database checks on the address revealed that this address is the residence of "Shellneka Clifton" (the top caller from KOFFIE's cell phone records).

85. On June 28, 2017, SA Gino conducted a review of the positive feedback page on NARCOBOSS's AlphaBay vendor profile page and was able to calculate that NARCOBOSS had 3,710 confirmed and finalized transactions where customers left feedback. The feedback listed the date, description of item sold, US dollar price of sale and the first and last letter of the AlphaBay username who conducted the purchase.

86. The investigation revealed that between July 7, 2016 and June 16, 2017, NARCOBOSS sold 7.120 kg of what he advertised "China White Synthetic Heroin Fentanyl Mix". A tally of the US dollar amount for each finalized sale revealed that NARCOBOSS received at the time of transactions \$284,800 worth of bitcoin. Utilizing the list of international packages that KOFFIE has received between 2016 and Present at "300 Berbro Street, Darby, PA" your affiant was able to calculate that the total weight of these packages shipped to KOFFIE was 7.001 kg.

87. SA Ressler reviewed the Pennsylvania Department of Labor and Industry records, which indicate that KOFFIE was last employed by "Waverly Heights LTD" during the

3rd quarter of 2016. Pennsylvania Department of Labor and Industry shows no reported employment for KOFFIE since that time period.

88. On June 29, 2017, agents conducting surveillance observed that the newer model Chevy Tahoe bearing Pennsylvania license plate "KKF 4165" (registered to "Henry Koffie, 300 Berbo Street, Darby, PA), had returned to 216 Walnut Street, Darby, PA (the residence of KOFFIE) and was parked in the driveway once again. Surveillance agents thus believe that KOFFIE has returned home from his trip.

89. On June 30, 2017, SA Ressler received a subpoena return from American Airlines regarding the historical travel records for KOFFIE. In reviewing those records, it was discovered that on June 16, 2017, KOFFIE travelled to Minneapolis, Minnesota. KOFFIE returned to Philadelphia, Pennsylvania on June 18, 2017.

90. During the course of this investigation, screenshots of NARCOBOSS' AlphaBay profile page have been captured for memorialization. One such capture was on June 21, 2017. On that date, NARCOBOSS' vendor page had a message stating, "I'm taking a short break until June 19, 2017. If you've ordered and your shipment is marked "shipped", then it is in the mail."

91. On June 22, 2017, HSI Portland submitted administrative subpoenas to the online postage company requesting information on USPS tracking numbers: 9205 5901 6491 7363 4945 84, 9205 5901 6491 7373 1607 14, 9205 5901 6491 7372 9352 45 and 9205 5901 6491 7362 0232 66.

92. The tracking number 9205 5901 6491 7363 4945 84 was the parcel that was identified as the USPS Priority Mail parcel that delivered the fatal dose of narcotics to Curtis C.W. on May 4, 2017. The other tracking numbers were from TFO Macomber's undercover purchases he conducted with NARCOBOSS.

93. On June 28, 2017, the online postage company returned information regarding the submitted tracking numbers. In their return, the company informed that 9205 5901 6491 7363 4945 84 was shipped on May 1, 2017 and was part of a batch order with 99 other parcels. The online postage company informed that the account used to purchase the postage had the labels sent to "GetTheYayo8@safe-mail.net." The online postage company informed that the same account purchased postage for tracking numbers 9205 5901 6491 7373 1607 14, 9205 5901 6491 7372 9352 45 and 9205 5901 6491 7362 0232 66.

94. On June 28, 2017, HSI Portland requested information on all other postage labels purchased from online postage company that were purchased by GetTheYayo8@safe-mail.net account using the digital currency bitcoin.

95. On June 29, 2017, the online postage company returned 5,706 labels that were purchased by GetTheYayo8@safe-mail.net account between September 6, 2016 and June 24, 2017. Within those 5,706 labels, I was able to locate and identify the postage purchased for:

- a. The parcel that delivered the fatal furanylfentanyl dose to C.W.
- b. The parcel that delivered the fatal fentanyl dose to L.M.
- c. The parcel that delivered the non -fatal furanylfentanyl doses to HOLIEN.
- d. The previously mentioned parcel that contained the furanylfentanyl purchased from NARCOBOSS by the Pittsburgh USPIS and FBI.
- e. All received parcels of suspected fentanyl purchased from NARCOBOSS by the Portland Police Bureau, USPIS and Oregon/ Idaho HIDTA.
- f. Parcels addressed and delivered to HOLIEN and WALTERS in Grand Forks, ND.

All 5,706 purchases of postage by GetTheYayo8@safe-mail.net account were made with bitcoin.

96. As you may recall I had previously received a subpoena return from the digital currency exchanger Coinbase, Inc. who had provided information on the digital currency account belonging to Henry Konah KOFFIE. The returned information from that company informed that they had terminated KOFFIE's digital currency account on September 28, 2016, as a result of KOFFIE's account receiving bitcoin from AlphaBay.

97. I reviewed GetTheYayo8@safe-mail.net 's online postal orders for the period between September 6, 2016 and September 28, 2016. I focused my attention to the bitcoin payments received by the online postage company from GetTheYayo8@safe-mail.net customer. I compared these received bitcoin payments with the outgoing bitcoin transactions made by Henry KOFFIE's Coinbase account. In doing this, I discovered that between September 6, 2016 and September 28, 2016 KOFFIE's Coinbase account conducted 21 bitcoin transactions directly to the online postage company provided bitcoin addresses for 21 online postage orders made by GetTheYayo8@safe-mail.net. The online postage company provided a one-time use bitcoin address per purchase order.

98. My analysis concluded that the 21 bitcoin transactions totaled \$2,929.52 and represented 367 postage labels being generated.

99. I therefore believe there is probable cause that:

- a. Beginning on or about May 2016, the exact date being unknown, and continuing through July 3, 2017, within the District of Oregon and elsewhere, KOFFIE, a.k.a. NARCOBOSS, and others known and unknown, knowingly, intentionally and willfully combined, conspired,

confederated, and agreed to unlawfully import, manufacture, distribute, and possess with the intent to distribute furanylfentanyl, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and death and serious bodily injury resulted from the use of such substances, all in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 846, 952(a), and 963;

- b. On or about May 1, 2017, within the District of Oregon and elsewhere, KOFFIE, a.k.a. NARCOBOSS knowingly and intentionally distributed furanylfentanyl, a Schedule I controlled substance, and death resulted from the use of the furanylfentanyl by C.W., all in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C); and,
- c. On or about May 19, 2017, within the District of Oregon and elsewhere, KOFFIE, a.k.a. NARCOBOSS knowingly and intentionally distributed fentanyl, a Schedule II controlled substance, and death resulted from the use of the fentanyl by A.M., all in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

100. Based on the foregoing information, your affiant respectfully requests that a warrant of arrest be issued for Henry Konah KOFFIE for violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

101. This affidavit and the requested criminal complaint and arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Scott Kerin (U.S. Attorney's Office for the District of Oregon) prior to being presented to the Court. AUSA Kerin informed me that in

his opinion, the affidavit sets forth sufficient probable cause to support the issuance of the criminal complaint and arrest warrant.

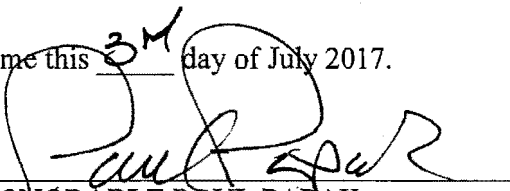
I respectfully request the Court to authorize the attached arrest warrant and criminal complaint.

Request for Sealing

102. I also respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested ~~search~~ warrant, including the application, this affidavit, the attachments, and the requested ~~search~~ warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time may endanger the life or physical safety of an individual, cause flight from prosecution, cause destruction of or tampering with evidence, cause intimidation of potential witnesses, or otherwise seriously jeopardize an investigation. Premature disclosure of the contents of the application, this affidavit, the attachments, and the requested ~~search~~ warrant may adversely affect the integrity of the investigation.

SWORD TO VIA TELEPHONE
PURSUANT TO PRCP 4.1 JGD
GUY GINO, Special Agent
Homeland Security Investigations

SUBSCRIBED and SWORN to before me this 31 day of July 2017.


HONORABLE PAUL PAPAK
United States Magistrate Judge