

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ROBERT JAMES FISCHER,

a/k/a Zach Brown

and

CHEERISH NOEL TAYLOR,

Defendants.

Case No. 1:23-MJ-114

FILED UNDER SEAL

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANTS**

I, Daniel McCoy, being duly sworn, depose and state the following:

INTRODUCTION

1. This affidavit is submitted in support of a criminal complaint and arrest warrants charging Robert FISCHER and Cheerish TAYLOR with knowingly and intentionally conspiring to distribute 50 grams or more of methamphetamine (pure), a Schedule II controlled substance, as well as a mixture and substance containing a detectable amount of heroin in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), and 846.

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since January 2021. I am currently assigned to the Washington Field Office, Northern Virginia Resident Agency. I am on a squad that investigates darknet related narcotics trafficking and I have been assigned to this squad since June 2021. Prior to being hired as a Special

Agent with the FBI, I was a Deputy Sheriff with the Collier County Sheriff's Office in Naples, Florida, and was so employed from April 2015 until January 2021. I have received formal training in the investigation of drug and violent crimes, including specialized training in forensic evidence collection. I have experience investigating various types of crime, and I have investigated or assisted in the investigation of several cases involving violent criminal activity, narcotics, and crimes against persons and property. I have been a sworn law enforcement officer during all times herein.

3. The facts and information contained in this affidavit are based upon my training and experience, participation in this and other investigations, personal knowledge, and observations during the course of this investigation, as well as the observations of other individuals involved in this investigation. All observations not personally made by me were relayed to me by the individuals who made them or were conveyed to me through my review of the records, documents, and other physical evidence obtained during the course of the investigation. This affidavit is meant to convey information necessary to support probable cause for the requested complaint and arrest warrant and is not intended to include each and every fact observed by me or known to the government. The inferences and conclusions I draw from the evidence included in this affidavit are what I believe based on my training, experience, and knowledge of the investigation.

FACTS SUPPORTING PROBABLE CAUSE

4. The United States, including the FBI and the U.S. Postal Inspection Service (USPIS), is conducting a criminal investigation of a darknet market vendor that operates using the monikers "SafeServe" and "Sky_HIGH" across several darknet markets.

5. A darknet market is a hidden commercial website that operates on a portion of the Internet that is often referred to as the TOR network, darkweb, or darknet. A darknet market operates as a black market, selling or brokering transactions involving legal products as well as drugs, weapons, counterfeit currency, stolen credit card details, forged documents, unlicensed pharmaceuticals, steroids, and other illicit goods.

6. Individuals typically purchase narcotics through darknet markets from “vendors,” who accept digital currency such as Bitcoin¹ for payment. “Vendors” are the darknet’s sellers of goods and services, often of an illicit nature, and they do so through the creation and operation of “vendor accounts” on darknet markets. Customers, meanwhile, operate “customer accounts.” Vendor and customer accounts are not identified by numbers, but rather monikers or “handles,” much like the username one would use on a clear web site. If a moniker on a particular marketplace has not already been registered by another user, vendors and customers can use the same moniker across multiple marketplaces. Based on customer reviews, vendors can become well known as “trusted” vendors.

I. Investigators Identify Darknet Vendor SafeServe

7. An investigation began in November 2021, when law enforcement discovered that a darknet vendor, which went by the moniker “SafeServe,” advertised for sale illicit substances on the darknet marketplace known as ToRReZ. A review of that page showed that SafeServe had for

¹ Bitcoin is a type of digital cryptocurrency. Functionally, it serves the same purpose as United States dollars, except that it is not tied to a central bank and is not regulated by a government such as a treasury. Bitcoin transactions take place entirely online and offer a degree of anonymity to users. Bitcoin transactions are securely recorded in a public ledger called a blockchain. Based on my training and experience, individuals who are involved in criminal activity over the darknet often purchase items in Bitcoin to conceal the true nature of their funds from law enforcement.

sale “pressed”² pills containing fentanyl,³ heroin, “China White,”⁴ and methamphetamine. Since that time, the FBI has reviewed the vendor profiles for the moniker “SafeServe” across several darknet markets, including ToRReZ Market, ASAP Market, AlphaBay Market, Dark0de Reborn Market, and Incognito Market. Certain of these vendor pages associated with SafeServe, including Incognito and AlphaBay appear to have never become operational, as indicated by no sales or product listings reflected on the vendor pages. On the other markets, to include ToRReZ, ASAP Market, and Dark0de Reborn, the vendor pages reflect the advertisement and sale of multiple controlled substances, including crystal methamphetamine, “pressed” pills containing fentanyl,⁵ heroin, cocaine, xanax, and suboxone.

8. It was discovered that the “SafeServe” accounts on all of these markets used the same PGP⁶ key, indicating that the same individual or individuals operated each of the accounts. Further SafeServe self-identified as the same vendor across multiple darknet markets. For

² Based on my training and experience, “pressed” indicates counterfeit pills. Counterfeit pills are fake medications that have different ingredients than the actual medication, but that resemble legitimate prescription pills in appearance. They may contain no active ingredient, the wrong active ingredient, or have the correct ingredient but in an incorrect quantity. Counterfeit pills may contain fentanyl and fentanyl analogues, including in lethal amounts.

³ As described below, these pills were advertised as “M30s” and “blues.”

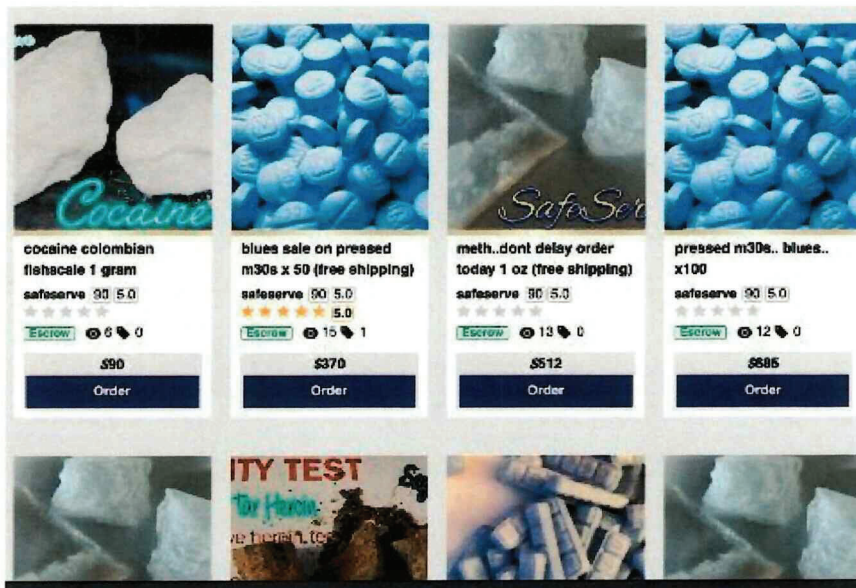
⁴ Based on my training and experience, “China White” indicates powder heroin, powder fentanyl, and various powder fentanyl analogues.

⁵ As described below, these pills were advertised as “M30s” and “blues.”

⁶ PGP, or Pretty Good Privacy, is used on darknet marketplaces to encrypt communications between vendors and customers. When a customer orders from a vendor or sends a vendor a message on a darknet market, that information may be stored in the marketplace’s database. Given concerns that the marketplace server may be hacked or seized by law enforcement, vendors and customers often communicate via PGP encrypted means to address this security problem. A vendor has both a PGP private key and a public key. A customer can use the vendor’s public key to encrypt a message. The vendor then uses a private key to decrypt the message. Vendors keep their private key secure, but they typically list their public key on their profile to enable customers to contact them.

example, on Dark0de, Safeserve wrote “we come straight over from White House market⁷ under the name safeserve where we finished with just over 700 sales. On ASAP Market, SafeServe indicated “we are safeserve from white house market, torrez, and darkode.”

9. The pressed pills containing fentanyl were listed as “Pressed M30s” and “Blues.” In the product description for the “pressed m30s” listings, SafeServe stated that “**These are not reg M30s they are PRESSED and are very strong...seasoned users only please.**” I know, through my training and experience, that oxycodone is commonly referred to as “M30” due to pharmaceutical grade oxycodone tablets having these imprints with the “M” indicating the manufacturer, Mallinckrodt pharmaceuticals, and the “30” indicating 30 milligrams. A screenshot of one of SafeServe’s advertisements for various drugs is below:



⁷ The darknet marketplace “White House” was no longer operational at the time the investigation commenced.

II. The FBI Conducts Undercover Drug Purchases from SafeServe

10. On or about November 2, 2021, an FBI Online Covert Employee (hereinafter referred to as “OCE”) accessed ToRReZ Market and ordered 3.5 grams of methamphetamine from SafeServe for \$80, plus shipping costs and a transaction fee. The OCE provided an address within the Eastern District of Virginia, where SafeServe could send the methamphetamine, and the OCE paid for the methamphetamine with Bitcoin. On November 9, 2021, law enforcement retrieved a white bubble mailer from a United States Post Office within the Eastern District of Virginia, with printed postage affixed to the front with the address designated by the OCE. The return address was to a residential address in Phoenix, Arizona. Within the mailer were blank notecards and plastic toys concealing a plastic cylinder which held a hard, crystalline substance. The practice of concealing a controlled substance is commonly referred to as “stealth”. This is done in an attempt to prevent the package from being seized by law enforcement during shipping. The hard, crystalline substance was sent to the DEA Mid-Atlantic Laboratory for testing and tested positive for methamphetamine hydrochloride and weighed a net 3.56 grams, with 99% purity.

11. Following the initial purchase as described in paragraph 11, the OCE made additional purchases using similar means and methods. In all, between on or about November 2, 2021, and the present, law enforcement conducted the following controlled purchases from SafeServe, as reflected in the table below. All packages included “stealth” materials of the kind that could be purchased at a dollar store, including stationary, children’s stickers, beads, and seasonal gifts items (i.e. heart stickers during the Valentine’s Day holiday). All purchases were

analyzed by the Drug Enforcement Administration (DEA) Mid-Atlantic Laboratory (MAL) and confirmed to have the substance reflected.⁸

Date Ordered	Marketplace Ordered	Type	Amount Ordered	Mailed from	DEA Laboratory Confirmation
11/2/2021	ToRRez	Methamphetamine	3.5 grams	Phoenix, Arizona	3.52 grams Methamphetamine Hydrochloride
01/13/2022	Dark0de	Pressed Oxycodone	25 tablets	Phoenix, Arizona	3.615 grams Flurofentanyl
2/3/2022	Dark0de	Methamphetamine	14 grams	Phoenix, Arizona	14.12 grams Methamphetamine Hydrochloride
3/9/2022	ASAP	Heroin	3 grams	Phoenix, Arizona	2.85 grams Heroin
4/4/2022	ASAP	Methamphetamine	14 grams	Phoenix, Arizona	15 grams Methamphetamine Hydrochloride
5/10/2022	ASAP	Methamphetamine	7 grams	Phoenix, Arizona	9.02 grams Methamphetamine Hydrochloride
9/23/2022	ASAP	Methamphetamine	7 grams	Phoenix, Arizona	7.98 grams Methamphetamine Hydrochloride

III. Investigators link TAYLOR and FISCHER to SAFESERVE

12. On or about February 3, 2022, an FBI OCE sent a payment of bitcoin equivalent to \$311USD to SafeServe for 14 grams of crystal methamphetamine, including shipping. Several days later, a correlating parcel was retrieved by the FBI from a covert mailbox within the Eastern District of Virginia. The parcel was a manila bubble mailer, which was sealed with tape, and had

⁸ Methamphetamine quantities reflected in the below chart indicate an amount of pure substance detected within a mixture and substance containing methamphetamine hydrochloride.

a return address city listed as Phoenix, Arizona. Within the parcel were miscellaneous stationary material concealing a small bag which held a hard crystalline substance. The hard crystalline substance was analyzed by the DEA MAL which confirmed the substance was methamphetamine hydrochloride with a net weight of 14.27 grams with 99% purity.

13. The miscellaneous packaging material associated with the February 3, 2022 order was analyzed by the FBI Laboratory to locate identity any latent fingerprints. Fingerprints were found on both the tape that sealed the manila mailer as well as the manila mailer itself. Through the FBI's national friction ridge print database, Next Generation Identification system (NGI), the fingerprints were identified belonging to CHEERISH TAYLOR ("TAYLOR").

14. During investigations into several other darknet vendors operating out of the Phoenix, Arizona area, TAYLOR was found to be a common telephone contact with at least three individuals who had been previously identified by the FBI as involved in darknet drug activity⁹. One of those individuals (hereinafter referred to as cooperating defendant "CD")¹⁰ was interviewed on December 1, 2022, with counsel present. During the December 1, 2022 interview, CD-1 identified a DMV photograph of TAYLOR, whom he knew by the nickname "Cece". CD then

⁹All three individuals have since pleaded guilty for their participation in a conspiracy to distribute controlled substances. *See, United States v. Schiffner*, Case No. 1:22-cr-217 (E.D. Va.); *United States v. Langer*, Case No. 1:23-cr-003 (E.D. Va.); *United States v. Dittman*, Case No. 1:23-cr-31 (E.D. Va)..

¹⁰ Prior to the December 1, 2022 interview, CD was charged in relation to his involvement in distribution of controlled substances, and later entered into a plea and cooperation agreement with the United States. Information provided by CD has proved to be reliable and credible, and has been independently corroborated through phone toll analysis, physical surveillance, review of communications on seized devices, law enforcement databases, and controlled purchases. There is no indication or information available to investigators that CD is providing false information regarding this investigation. CD has other prior misdemeanor and felony convictions and is deemed reliable and credible. For the purposes of this affidavit, CD is referred to using the male pronouns, regardless of gender. Furthermore, information from the debrief is attributed to "CD" regardless of whether CD's identity is explicitly referenced elsewhere in this affidavit.

stated that TAYLOR operates the Darknet vendor account SafeServe with her live-in boyfriend, ROBERT FISCHER (“FISCHER”). CD claimed that he initially met TAYLOR and FISCHER through more traditional hand-to-hand drug transactions where CD would buy narcotics from TAYLOR and FISCHER at their shared residence. CD claimed to have become friends with TAYLOR and FISCHER and taught them both how to run a vendor account on the darknet. CD was familiar with some of the inner-workings of the SafeServe operation, including TAYLOR and FISCHER’s respective roles. For example, CD claimed that FISCHER primarily operated the SafeServe account and TAYLOR packaged the drugs and deposited them at various blue USPS collection boxes throughout the Phoenix, Arizona area. Further, CD stated that TAYLOR would park her vehicle a short distance away and deposit the parcels on foot as opposed to driving up to the blue USPS collection boxes. CD claimed that TAYLOR did this in order to not have her vehicle associated with her activity. CD further noted that after his arrest and prior to his initial appearance in the Eastern District of Virginia, he contacted TAYLOR to inform her and FISCHER that he had been arrested. CD further relayed that he warned TAYLOR to “stay away from” methamphetamine, because it can carry a 10-year mandatory minimum.

IV. Seized Devices Contain Conspiratorial Messages between TAYLOR, FISCHER, and Others

15. Search warrants issued within the Eastern District of Virginia for phones seized from Devin LANGER and Rick SCHIFFNER contained numerous communications between LANGER, SCHIFFNER, TAYLOR and FISCHER. The phone numbers utilized in the messages below were associated with FISCHER and TAYLOR in the following ways:

Phone	User	Summary of Attribution Evidence
480-202-9650 (hereinafter,	TAYLOR	Subscriber data from Amazon.com and CashApp both had TAYLOR 1 listed as belonging to TAYLOR. Additionally,

<p>“TAYLOR 1”)</p>		<p>LANGER had TAYLOR 1 saved in his phone as “CeCe Watkins” and referred to this individual as “Cece.” Further, in the messages between TAYLOR 1 and LANGER, TAYLOR 1 requested payment from LANGER to their CashApp token, “\$CeceCash24”. Subscriber data for this CashApp token showed it was registered to TAYLOR. Toll analysis also showed that TAYLOR 1 had approximately 348 communications with FISCHER 2, a telephone number listed for TAYLOR’s boyfriend, FISCHER.</p>
<p>480-851-1643 (hereinafter, “TAYLOR 2”)</p>	<p>TAYLOR</p>	<p>In a search of SCHIFFNER’s telephone, a group chat was found with SCHIFFNER, LANGER, and TAYLOR 2. A text message in this group chat sent by TAYLOR 2 was signed “CeCE.” Further, toll analysis showed TAYLOR 2 had approximately 430 communications with a telephone number for TAYLOR’s boyfriend, FISCHER. (referred to below as “FISCHER 2”)</p>
<p>602-79-1570 (hereinafter, “TAYLOR 3”)</p>	<p>TAYLOR</p>	<p>Both Amazon.com and CashApp subscriber data showed TAYLOR 3 registered to TAYLOR.</p>
<p>480-294-1995 (hereinafter “FISCHER 1”)</p>	<p>FISCHER</p>	<p>On 2/23/2022, LANGER messaged FISCHER 1 about the Darknet market Dark0de shutting down. Several days later, LANGER texted FISCHER 1 and apologized for forgetting their birthday, which LANGER described as taking place the day after Dark0de shut down. FISCHER’s birthday is 2/24/1988. Additionally, LANGER referenced FISCHER 1 as “Bobby.”</p>
<p>480-868-0998 (hereinafter, “FISCHER 2”)</p>	<p>FISCHER</p>	<p>Toll analysis showed that FISCHER 2 had approximately 348 communications with TAYLOR 1 and 430 communications with TAYLOR 2, both telephone numbers used by FISCHER’s girlfriend, TAYLOR. Further, subscriber information for this telephone number belonged to “Zach Brown.” According to CD, “Zach Brown” was the alias used by FISCHER to avoid detection from law enforcement for an outstanding warrant.</p>
<p>602-935-0215 (hereinafter,</p>	<p>FISCHER</p>	<p>In text messages with LANGER, FISCHER 3 provided LANGER with their email address, bojbf24@gmail.com. Open-source records showed this email address to belonged to FISCHER. In further text messages FISCHER 3 provided</p>

<p>“FISCHER 3”)</p>		<p>FISCHER and TAYLOR’S shared residence at which TAYLOR has been seen by law enforcement, as their physical address.</p>
<p>602-206-0035 (hereinafter, “FISCHER 4”)</p>	<p>FISHCER</p>	<p>In a text message, LANGER referred FISCHER 4 as “Bobby” and thanked him for being a good friend. Additionally, FISCHER 4 gave the gate code for the pedestrian gate at an entrance to FISCHER and TAYLOR’s shared residence at which TAYLOR has been seen by law enforcement. This gate code was confirmed to be the accurate gate code by the FBI in January 2023.</p>

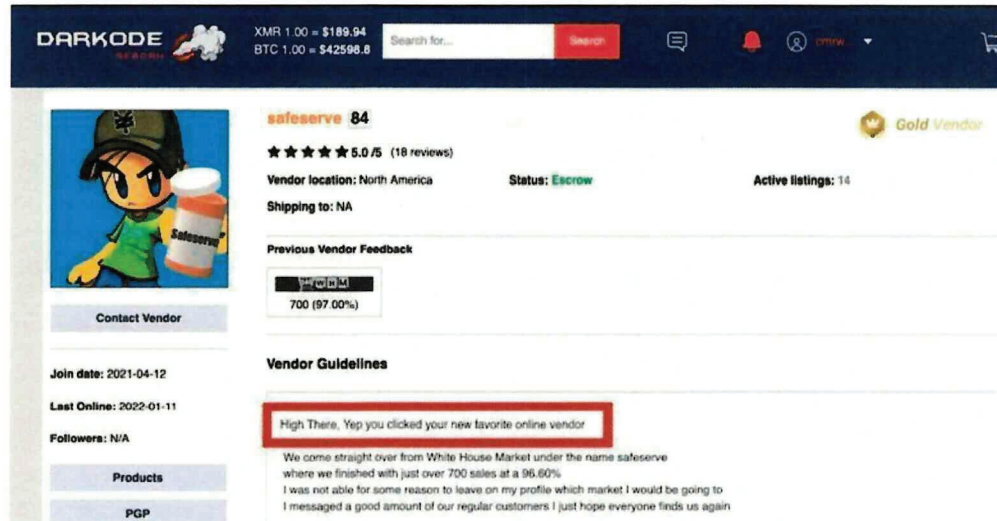
16. Numerous text messages between LANGER and TAYLOR 1 contained references to the Safeserve vendor pages on the darknet.

a. For example, on March 20, 2021, the following conversation occurred:

<p>LANGER</p>	<p>“Will you ask him how much for a ball of the China white and how much for a quarter.”</p>
<p>TAYLOR</p>	<p>“Yes sir. For you right. I wrote out our lil vendor profile today... I think its got potential. You’ll appreciate the 1st line... High there... yep, you just clicked your new favorite vendor! Haha”</p>
<p>LANGER</p>	<p>“Yep for me! It’s for potential for sure!! Lol First impressions are most important !”</p>

Consistent with TAYLOR’s statement in the above text message, the vendor profile for SafeServe in Dark0de market contained the line: “High there... yep, you clicked your new favorite online vendor.” The account reflected a creation date of April 12, 2021.¹¹ A screenshot of the Safeserve vendor page on the Dark0de market is below; the line is highlighted in red:

¹¹ As indicated elsewhere in this affidavit, there were multiple vendor pages associated with SafeServe. Not all reflect the date of creation.



b. Additionally on May 3, 2021, the following conversation occurred following TAYLOR 1 arranging a sale of controlled substances to LANGER.

TAYLOR	“Just like we do for our store n I have a batch to send out anyways taylorcheerish@gmail.com Got it”
LANGER	“You two have been doing the online thing?! I wasn’t sure if you two went through with it!! That’s so fucking dope, I’m so stoked to hear that. I hope I was able to help you two get it all setup.”
TAYLOR	“Yeah its crazy a lot of work w all the encryptions That’s y im giving these to you at cost”
LANGER	“Yeah for sure. It’s only like that with White House market. The other markets aren’t as crazy and strict like that. I’m currently selling on another market that’s not White House. It’s really dope and it’s a lot easier to use. It’s called ASAP market.”
TAYLOR	“That’s dope B n I were just talking bout another place we have like 45 good ratings now”

LANGER	“That’s so awesome. The ordes come in fast huh?”
TAYLOR	“We have G. Blues. Black. Bars and adding in coke now Yeah a little overwhelmed at time I just have to get used to setting aside the time everyday”
LANGER	“That’s badass. I’m super stoked for you two.”

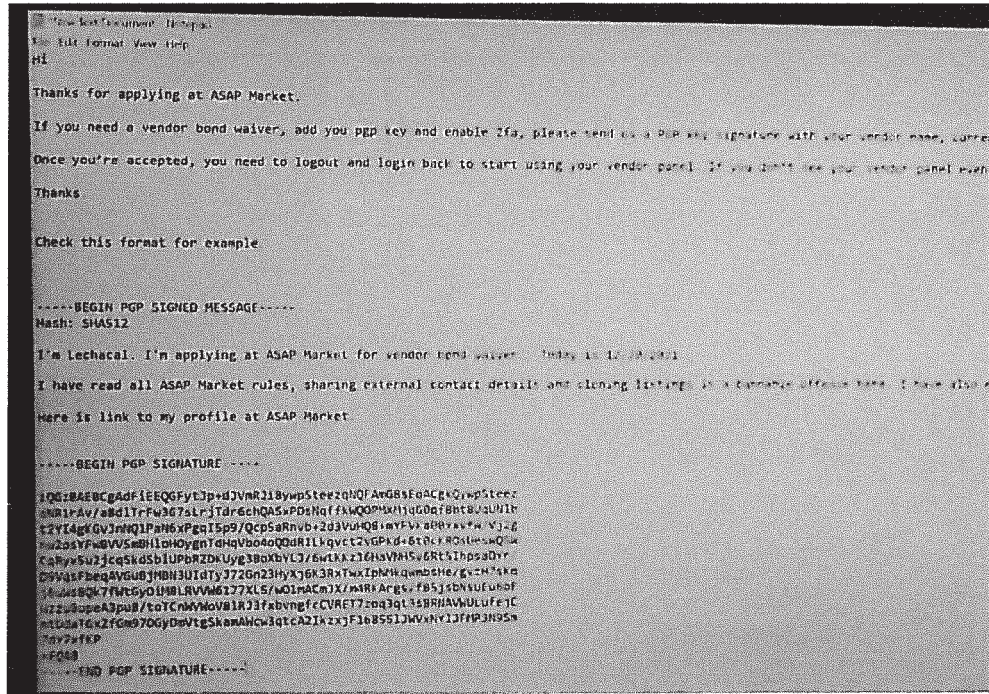
17. Similarly, numerous text messages between LANGER and FISCHER were also found that contained references to vendor pages on the darknet.

- a. For example, on January 27, 2021, two months before the above text between LANGER and TAYLOR, LANGER sent a message to FISCHER 3 stating “hey do you still want me to help you with the PGP key thing? And remote into your computer?”
- b. Later, on or about February 12, 2021, FISCHER 3 messaged LANGER “When you get a chance let’s do that remote desktop thing I want to get that set up that encryption messaging.” And on February 27, 2021, FISCHER 3 sent a message to LANGER stating “You up? If you are give me a call I want to open this shop up I just need to set up that encryption.”
- c. On or about December 23, 2021, LANGER sent a message to FISCHER 4 stating, “hey if you still haven’t figured out your Manero thing, go to this website and enter your seed to try to recover your wallet...” As noted previously in this affidavit, Safeserve only accepted payment via the cryptocurrency Monero.
- d. The following year, in February 2022 LANGER and FISCHER 3 discussed the creation of additional darknet vendor pages. Between February 23 and February

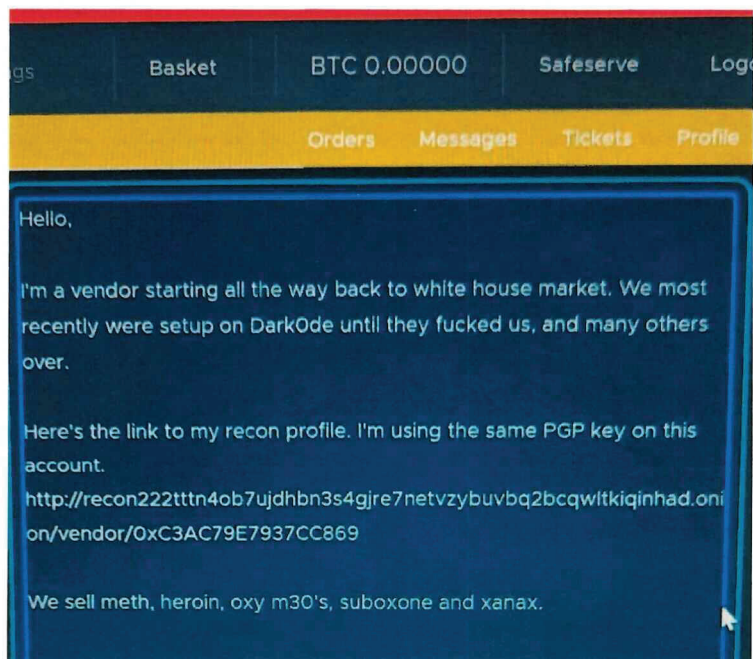
24, 2022, the following conversation occurred between LANGER and FISCHER 3:

LANGER	<p>“Dark0de fucking exit scammed FUCK Fucking piece of shit mother fuckers god fucking damnit Bobby, go to ASAP market and apply for a vendor bond waive. I just did it and they approved me.”</p>
FISCHER	<p>“Maybe they are just offline How do you know they exit scammed?”</p>
LANGER	<p>“No I checked dread They deleted their admin account I dread It’s confirmed”</p>
FISCHER	<p>“Damnt I’m out 4 grand”</p>
LANGER	<p>“Me too. Fucking pieces of shits Fuck You’ll get the bond waived for sure I have a refer all Referral code b”</p>
FISCHER	<p>Can you come over</p>
LANGER	<p>Yes I’ll help you setup ASAP Give me 2 hours I’ll be there</p>

The day after the above-referenced conversation, FISCHER messaged LANGER saying, “Hey they sent me this?” and sent a picture of a computer screen showing a message that was sent to him by one of the administrators on ASAP Market. That photograph is shown below:



LANGER then asked FISCHER, “Will you send me a pic of the message I sent them?” After which FISCHER sent the following picture, portions of which have been cropped for purposes of this affidavit:



18. I know from my training and experience, and experience in this investigation, that an “exit scam” is a term for when a darknet market shuts down unexpectedly. Darknet markets frequently hold funds in escrow between the placement of an order and the finalization of the order. Order finalization typically occurs in one of two ways: (1) the customer has marked the receipt of shipment; or (2) where the customer has neither marked receipt nor “disputed” an order within a certain period of time (often 14 days), the order finalizes automatically. “Exit scams” therefore allow the operators of the market to obtain the cryptocurrency funds that are held in escrow at the time the market shuts down, thereby depriving vendors of payment remitted to them for orders that may have already been fulfilled. While the Safeserve ASAP vendor profile did not indicate a creation date, the earliest customer review reflected on the vendor page is dated on or about March 10, 2022, within weeks of the text message conversation reflected above.

19. Messages involving TAYLOR and FISCHER further explicitly referenced distribution of controlled substances.

- a. For example, on February 10, 2021, LANGER wrote FISCHER 3 “Bobby I have a bunch of the fake chins [sic] white. I tried it last night and my buddy overdosed on it, and I had to Narcan him. It’s the exact same shit you have in Arizona. Just as strong. Here’s the thing though, it’s way cheaper. I’m pretty sure I can get you the same shit, for way cheaper then Tony. Call me when you can.”
- b. On or about March 20, 2021, TAYLOR 1 wrote LANGER “Are you getting a good price on the blues I just met a new plug today finally getting a decent price.” After LANGER asked about her pricing, TAYLOR added “I can do them for you at 6 or 7...but if you’re needing like bulk I can see if I can do better if I pu more than 100 at a timd [sic]. If you buy 100 pack I can do \$5 actually.”
- c. On or about November 20, 2021 LANGER wrote FISCHER 4: “hey when you have a second let’s talk. Just about business stuff with clear and blues. Idk if you wanted to talk in private or something.”

20. FISCHER, who is a convicted felon, also had texted about his ownership and use of firearms on multiple occasions.

- a. For example, on December 4, 2021 FISCHER 4 wrote: “Yo do you wanna go to a gun show tomorrow me and cherish are going to go tomorrow is the last day I’m buying tickets now.”
- b. On January 7, 2022, the following text message conversation occurred:

FISCHER	“...if your back in town you should help me build my ar 15 I have all the pieces for it it’s just touch to put it together but it
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	shouldn't be too hart I have done it before but it's been awhile"
LANGER	"What're you doing tomorrow? I was going to come over and kick it if you're down."

c. On February 3, 2022, FISCHER 4 sent a message to LANGER "we going shooting?"

V. SafeServe Account Suspension & Identification of Sky HIGH

21. Between August 2022 – October 2022, multiple darknet vendors shipping out of the Phoenix, Arizona area were arrested by the FBI.¹² Shortly thereafter, in November 2022, SafeServe went on "Vacation Mode". Vacation Mode is a profile status that vendors can place their account in when they are temporarily on hiatus. I know through my training and experience that vendors may go on Vacation Mode as means of operational security.¹³

22. On January 20, 2023, the FBI and USPIS conducted surveillance at FISCHER and TAYLOR'S shared residence and located a vehicle registered in TAYLOR's name in a parking space associated with the premises. Your affiant is familiar with TAYLOR's appearance from reviewing DMV records containing her photograph, name, date of birth, height, weight, eye color, and hair color. During surveillance, TAYLOR was observed exiting her residence, walking to her

¹² The following individuals were arrested between August and October 2022 pursuant to charges out of the Eastern District of Virginia. All have since pleaded guilty to charges arising out of their darknet drug distribution schemes. *See US v. McKernan*, Case No. 1:22-cr-234 (E.D. Va.); *US v. Udvardi*, Case No. 1:22-cr-225 (E.D. Va.); *US v. Schiffner*, Case No. 1:22-cr-217 (E.D. Va.); *US v. Langer*, Case No. 1:23-cr-003 (E.D. Va.).

¹³ Based on my training and experience, I know that some vendors will leave their account in Vacation Mode indefinitely in order to mislead law enforcement into a false belief that they have ceased distributing controlled substances, while, in actuality, the vendor will simply create a new account, thus assuming a new online identity.

vehicle, and departing in that vehicle. An image of TAYLOR entering the vehicle registered in her name and at the parking space associated with her residence is below:¹⁴



23. The vehicle was followed to an apartment complex across the street from the United States Postal Service (USPS) post office located at 4949 E. Van Buren Street, Phoenix, Arizona. TAYLOR exited her vehicle, crossed the street on foot, and walked into the post office. Surveillance footage showed TAYLOR, wearing the same jacket that TAYLOR was observed wearing as she left her residence, then deposited five manila mailers into a blue USPS collection box inside of the lobby. A still shot of surveillance footage below shows TAYLOR as she walked to the blue USPS collection box just before making the deposit. The manila mailers can be seen inside the tote bag in TAYLOR's left hand:

¹⁴ Images are cropped for purposes of this affidavit.



24. After TAYLOR made the deposit, TAYLOR was observed walking back across the street, entering her vehicle, and departing. USPIS subsequently seized the five mailers that were deposited by TAYLOR. Contact was made with the intended recipient of one of those parcels who granted consent to open the parcel. Inside the parcel were miscellaneous stationary materials, including a greeting card, straws, pens, silver glitter, and a heart-shaped pencil, as well as a clear cylinder with suspected crystal methamphetamine.¹⁵ This packaging style was similar to how SafeServe had packaged their drugs.

25. USPIS executed a search warrant, issued within the District of Arizona, on one of the other parcels. Inside of this parcel found miscellaneous stationary with several Suboxone (buprenorphine and naloxone) sublingual films, still in the original packaging. Within the parcel were miscellaneous stationary items concealing the Suboxone. The use of stationary materials as stealth along with the Suboxone was similar to the methods used by SafeServe. This packaging style was similar to how SafeServe had packaged their drugs.

¹⁵ Official laboratory results for this item are currently pending.

26. Continuing in January 2023, the FBI identified a darknet vendor believed to be operated by the same individuals who were responsible for the SafeServe accounts. The account, Sky_HIGH, was created on ASAP market or around the same time that the SafeServe accounts initially went into Vacation Mode.¹⁶ Further, consistent with CD’s statements to the effect of directing TAYLOR and FISCHER to “stay away from” methamphetamine in or around October 2022, the Sky_HIGH vendor page contained the following statement on its profile page “Meth Sales Will Be ENDING SOON... We have up a Super SALE RN.”

27. Numerous other similarities were found between SafeServe and Sky_HIGH:

- a. Both accounts offered Suboxone and black tar heroin, among other controlled substances.
- b. Both accounts only accepted the cryptocurrency Monero as payment.
- c. Both accounts offered free shipping.
- d. Both accounts described methamphetamine as “GFunk”.
- e. Both accounts used the term “crème de la crème” in the product listing for black tar heroin.
- f. Both accounts had similar “About Me” pages. A portion of such is shown below:

Images from SAFESERVE Listings	Images from SKY_HIGH Listings
“MONERO is the ONLY Payment Accepted”	PAYMENTS: ONLY Accepting MONERO (XMR)
Will Refund 50% if package did not arrive at no fault of address provided. If package shows as Delivered NO Refund will be given. If package is Return to Sender NO Refund will be given. We copy and paste exactly the address you send so please triple check.	NO REFUND will be given if package is “Undeliverable” due to error of Buyer. Will Refund 50% if package did not arrive at no fault of address provided. If package shows as Delivered NO Refund will be given. If package is Return to Sender NO Refund will be given.
Methamphetamine, Crystal, GFunk, Glass, Meth, Ice, Dupe, Shit.	#Meth #Stimulant #GFUNK #Ice #Shards #Glass #Crystal #Sale

¹⁶ While, as noted above, ASAP does not provide account creation dates, the earliest review identified on the Sky_High account was dated on or about November 23, 2022.

g. Both accounts used what appear to be the same picture in listings for crystal methamphetamine:

Images from SAFESERVE ASAP Listing	Image from SKY_HIGH ASAP Listing
<p data-bbox="246 470 743 512">Listing: "Meth- 7 Gs – FREE Shipping"</p> 	<p data-bbox="857 470 1404 546">Listing: "Ball of METH SALE – 3.5 Grams - \$50"</p> 
<p data-bbox="246 919 755 961">Listing: "Methamphetamine Half Ounce"</p> 	<p data-bbox="857 919 1404 961">Listing: "METH SALE – 14 Grams - \$150"</p> 

28. On February 8, 2023, an FBI OCE made a controlled purchase of 3.5 grams of crystal methamphetamine from darknet vendor Sky_HIGH and requested it be shipped to an undercover mailbox within the District of Nevada. On February 23, 2023, the FBI retrieved the correlating parcel, which was a manila mailer, similar to those previously shipped by SafeServe. USPS tracking information showed that the parcel originated in the Phoenix, Arizona, area, just as all previous SafeServe orders had. Within the parcel were miscellaneous stationary items, similar to those that were previously used by SafeServe, concealing a white crystalline substance. The

crystalline substance was sent to the DEA MAL which confirmed the substance contained consisted of 3.58 grams methamphetamine hydrochloride with 100% purity.

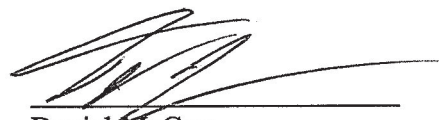
29. Review of the Sky_HIGH ASAP Market page on or about May 19, 2023 indicates that the account is still active. The vendor profile for Sky_High on ASAP market contained an update to the profile listing dated in May of 2023 which stated: "UPDATE: 5.9.23 Suboxone – 8mg/2mg Strips in STOCK..Check out SALE Price b/c won't last much longer! Adderall 20mg B973 and Xanax Bars SOLD OUT Until Restock mid month." The vendor page further reflected the completion of at least 137 sales on ASAP market by Sky_HIGH, with customer reviews dating up to at least as late as May 12, 2023.

(CONTINUED ON NEXT PAGE)

CONCLUSION

30. Based on the facts set forth above, I respectfully submit that there is probable cause to believe that between at least as early as January 2021 and continuing to on or about May 2023, within the Eastern District of Virginia and elsewhere, ROBERT JAMES FISCHER and CHEERISH NOEL TAYLOR did knowingly and intentionally combine, conspire, confederate, and agree together and with each other, and with others, known and unknown, to distribute controlled substances, including 50 grams or more of methamphetamine, a Schedule II controlled substance, and a mixture and substance containing heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

Respectfully submitted,



Daniel McCoy
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to in accordance with Fed. R. Crim. P. 4.1
by telephone on June 1, 2023



Digitally signed by Ivan Davis
Date: 2023.06.01 15:04:27 -04'00'

The Honorable Ivan D. Davis
United States Magistrate Judge