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**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

NOAH BLOOM (1),

SHANE DAVIS (2),

Defendant

Case No.: **20-mj-2669**

COMPLAINT FOR VIOLATION OF

Title 21 U.S.C. § 841 and 846 Conspiracy to  
Distribute Controlled Substances (Felony).


The undersigned complainant duly sworn states:

**COUNT 1**


Beginning on a date unknown, continuing up to and including June 19, 2020, within the Southern District of California, and elsewhere, defendants NOAH BLOOM and SHANE DAVIS did knowingly and intentionally conspire with each other and with other persons known and unknown to distribute 3,4-Methylenedioxyamphetamine (commonly known as MDMA, or ecstasy), a Schedule I Controlled Substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

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1 The complainant states that this complaint is based on the attached Statement of  
2 Facts incorporated herein by reference.

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4   
5 David D. Jones,  
6 United States Postal Inspector

7 Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
8 telephone on this 7th day of July, 2020.

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11 HON. LINDA LOPEZ  
12 U.S. MAGISTRATE JUDGE

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**STATEMENT OF FACTS**

***Introduction***

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3 1. On June 19, 2020, U.S. Postal Inspectors arrested Noah Bloom (“Bloom”) and  
4 Shane Davis (“Davis”) after they travelled to a U.S. Post Office in Carmel Valley, CA, to  
5 retrieve four parcels, each containing approximately one kilogram of MDMA.

6 ***June 19, 2020- Seizure of 4 kilograms of MDMA***

7 ***Introduction of MDMA Parcels***

8 2. On June 10, 2020 US Customs and Border Protection (“CBP”) officers seized  
9 an international parcel at the JFK, NY International Mail Facility (“June 10<sup>th</sup> Parcel”). The  
10 June 10<sup>th</sup> Parcel originated from Great Britain and was addressed to “James Knight, 11249  
11 Vista Sorrento Pkwy #304 San Diego, CA 92130.” Upon inspection, the June 10<sup>th</sup> Parcel  
12 was discovered to contain approximately 1,257 grams of a crystalline substance which field  
13 tested positive for methylenedioxyamphetamine commonly known as MDMA or  
14 ecstasy (Schedule I)(“MDMA”). Based upon U.S. Postal Service records, the Vista  
15 Sorrento Pkwy address, listed on the June 10<sup>th</sup> Parcel, was a fictitious address.

16 3. Thereafter, on June 15, 2020, within the Southern District of California, Postal  
17 Inspectors located and intercepted two additional international parcels (“June 15<sup>th</sup> Parcels”)  
18 with the same fictitious recipient’s name and address that was found on the June 10<sup>th</sup> Parcel.  
19 Pursuant to a subsequent inspection, the June 15<sup>th</sup> Parcels were found to each contain  
20 approximately one kilogram of a substance that field tested positive for MDMA

21 ***Additional April 28, 2020 Parcel***

22 4. According to utility bills and Bloom’s girlfriend, Bloom’s primary residence  
23 is located at 269 Glendale Drive, San Marcos, CA 92069 (“Glendale Residence”). Pursuant  
24 to the discovery of these aforementioned parcels, agents queried U.S. Postal Service  
25 records, and discovered that the Glendale Residence, on April 28, 2020, had received a  
26 parcel that was shipped from Great Britain. According to U.S. Postal Service records,  
27 Bloom signed for the receipt of this additional parcel.

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***Bloom Calls Post Office Regarding Parcels Containing MDMA***

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2 5. On June 18, 2020, during an unrecorded conversation, a person purporting to  
3 be “James Knight,” called Carmel Valley Post Office inquiring international packages that  
4 were tracked to the Carmel Valley Post Office. U.S. Postal Inspectors ultimately informed  
5 “James Knight” that the three parcels [the June 10<sup>th</sup> Parcel and the June 15<sup>th</sup> Parcels] were  
6 available for pick-up. “James Knight” then stated that he would have his room-mate, whose  
7 name was “Shane,” pick up the three parcels the following day.

8 6. On June 19, 2020, the Carmel Valley Post Office received yet another  
9 international parcel addressed to “James Knight” at the same fictitious address used on the  
10 three aforementioned international parcels (“June 19<sup>th</sup> Parcel”). During a subsequent  
11 inspection of the June 19<sup>th</sup> Parcel, agents discovered that the June 19<sup>th</sup> Parcel also contained  
12 a crystalline substance which filed tested positive for MDMA.

***Bloom and Co-conspirator Arrive to Retrieve Parcels Containing MDMA***

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14 7. Later that same day, surveillance agents observed a white Tesla Model 3  
15 (CA#8DYB541)(“White Tesla”), arrive at the Carmel Valley Post Office. The White Tesla  
16 was occupied by a driver [later identified as Bloom] and a front passenger [later identified  
17 as Davis]. Upon arrival the White Tesla parked near the Post Office and Davis got out of  
18 the White Tesla and went into the post office.

19 8. While in the Carmel valley Post Office, the Davis, presented his California  
20 Identification Card and, in return received the four aforementioned parcels [the June 10<sup>th</sup>  
21 Parcel, the June 15<sup>th</sup> Parcels and the June 19<sup>th</sup> Parcel]. Thereafter, Davis left the post office  
22 and started to walk in the direction of where the White Tesla was parked.

***Apprehension of Bloom***

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24 9. Then, inexplicably, Davis walked in a different direction, away from the  
25 White Tesla. The White Tesla then started to back out of its parking space. Agents  
26 thereafter, moved in to apprehend Bloom and Davis. The passenger, Davis, was  
27 apprehended without incident. The driver [Bloom] however, failed to immediately yield  
28 after surveillance agents activated their lights and sirens. After a short period of failing to

1 yield, surveillance agents blocked his path with another vehicle and only then did Bloom  
2 stop. Bloom was, thereafter, taken into custody.

3 ***Interview of Bloom's Co-conspirator Davis***

4 10. During a recorded post arrest interview, Davis stated that Bloom had asked  
5 Davis to go into the post office to retrieve parcels on his behalf. When asked why he did  
6 not go back to the White Tesla, Davis stated that he knew something was wrong and had a  
7 strange feeling when he was carrying the parcels.

8 11. Moreover, following a consent search of Davis' cellular telephone, agents  
9 discovered that the same telephone number that had called the Carmel Valley Post Office,  
10 while claiming to be "James Knight," had also placed calls to Davis' telephone.

11 ***Search of the White Tesla***

12 12. During the subsequent consent search of the White Tesla, agents discovered  
13 another parcel addressed to "Santiago Fortino" at 3427 Capalina Road #28, San Marcos,  
14 CA 92069. Located within this parcel, agents located \$2,400.00 in U.S. currency.  
15 Additionally, \$1,260.00 was located in the center counsel of the White Tesla. Also located  
16 within the White Tesla, were new and unused U.S. postal packaging supplies.

17 ***2016 Distribution Activates***

18 ***May 2, 2016 Parcel Containing 5.58 Pounds MDMA***

19 13. On May 2, 2016, CBP inspected an international parcel from the Netherlands  
20 addressed to Mikaela Rhoads ("Rhoads") at address 8148 Genesee Avenue Apt. 125, San  
21 Diego, CA 92122. This parcel contained fourteen sealed puzzle boxes, with ten containing  
22 anomalies. The ten anomalous puzzle boxes contained 5.58 pounds of MDMA.

23 ***May 4, 2016 Parcel Containing 5.61 Pounds of MDMA***

24 14. On May 4, 2016, CBP intercepted an international parcel from the  
25 Netherlands, addressed to "Noah Bloom" [Bloom] at 3875 Cornell Drive, Oceanside, CA  
26 92056. This parcel contained fourteen sealed puzzle boxes, with ten containing anomalies.  
27 The ten anomalous puzzle boxes contained 5.61 pounds of a white/light gray crystal-like  
28 substance later identified as MDMA.

***Controlled Delivery of the May 4, 2016 Parcel***

15. On May 9, 2016, agents conducted a controlled delivery of the May 4, 2016 parcel which contained MDMA. The May 4 Parcel was received by Catherine Bloom, later identified as Bloom's mother. After the delivery of the MDMA parcel, a search was performed on the residence. The search resulted in the seizure of various items including a Blue and Red Paper Notebook with four pages of USPS tracking labels (found in Noah Bloom's room and inside of a carry bag with his items inside).

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