

ORIGINAL

IN THE UNITED STATES DISTRICT COURT U.S. DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION **FILED**

UNITED STATES OF AMERICA

v.

HYUN JI MARTIN (01)

No. 4:21-MJ-402-BJ

CLERK U.S. DISTRICT COURT

By: _____

Deputy

JUN - 4 2021

CRIMINAL COMPLAINT

I, Postal Inspector Jared Lonborg, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Alleged Offense:

Beginning no later than on or around March 23, 2020, and continuing into and including June 3, 2021, in the Fort Worth Division of the Northern District of Texas, **Hyun Ji Martin**, along with others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together with each other to commit an offense against the United States, that is to possess with intent to distribute Gamma-Hydroxybutyric Acid (GHB), a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C), and in furtherance thereof and to effect the illegal objects thereof, committed numerous overt acts, all in violation of 21 U.S.C. § 846 (21 U.S.C. § 841(a)(1)) and (b)(1)(C)).

Probable Cause:

1. I am a U.S. Postal Inspector employed by the Fort Worth Division of the U.S. Postal Inspection Service (USPIS), specifically in the Fort Worth Division Headquarters. I am a sworn Federal law enforcement officer empowered to investigate criminal activity involving or relating to the United States Postal Service and/or United States Mail. As

part of my duties, I investigate incidents where the United States mail system is used for the purpose of transporting non-mailable matter, including controlled substances in violation of Title 21, United States Code, Sections 841(a)(1) Possession with Intent to Distribute a Controlled Substance, Title 21, United States Code, Section 843(b), Use of a Communication Facility to Facilitate the Commission of a Federal Drug Felony, and when warranted, Title 21, United States Code, Section 846, Conspiracy to Distribute a Controlled Substance.

2. It is my belief that on or about March 23, 2020, and continuing into and including June 3, 2021, Hyun Ji MARTIN did conspire with other individuals to possess with intent to distribute a controlled substance in violation of 21 U.S.C. § 846 (Conspiracy to Possess, with Intent to Distribute a controlled Substance in Violation of 21 U.S.C. § 841).

3. Since this affidavit is submitted only for the limited purpose of securing a criminal complaint, I have not set forth each and every fact known to me concerning this investigation. I have included what I believe are facts sufficient in establishing probable cause for the complaint sought. The facts in this affidavit are based on, among other things, my review of evidence and discussions with other law enforcement officers.

4. MARTIN is known to reside at an apartment on Valley Ranch Parkway East in Irving Texas; according to database checks, she is a lawful permanent resident of the United States and a citizen of South Korea. During this investigation, MARTIN has been identified as a source of supply and distributor for Gamma-Hydroxybutyric Acid (GHB), a Schedule I controlled substance, and Gamma-Butyrolactone (GBL), an analogue of

GHB regulated as a List I controlled chemical and Schedule I substance. MARTIN utilizes dark web markets to facilitate the sales and distribution of these substances. It has been identified MARTIN is supplying large quantities of GHB and GBL to her purchasers on these dark web markets, in addition to receiving bulk quantities of these substances from known and unknown sources of supply.

5. Beginning on or around March 23, 2020, the North Texas Parcel Task Force (NTPTF) initiated an investigation into MARTIN for the suspected distribution of narcotics via U.S. Mail. While conducting surveillance activities on an unrelated investigation at the Hurst, TX Post Office, an Asian female driving a black Mercedes Benz ML 350 was observed at that post office dropping off numerous parcels which were characteristic of those related to the distribution of narcotics utilizing the dark web. Task Force Officers (TFOs) ran the license plate information and determined the vehicle was registered to Hyun MARTIN. TFOs continued to monitor the movements and mailing activities of MARTIN beginning on or around this date.

6. On May 7, 2020, TFOs identified a parcel, USPS Priority Mail parcel bearing tracking number ending in 8037 38 addressed to "EXTENDED STAY AMERICA ATTN: HYUN MARTIN, 1221 N WATSON RD, ROOM #171, ARLINGTON TX 76006-6250," mailed by a known distributor of methamphetamine (also being investigated by law enforcement under a separate case). TFOs had previously identified MARTIN's vehicle, the Mercedes Benz ML 350, at this location.

7. On May 13, 2020, TFOs executed a federal search warrant for USPS Priority Mail parcel bearing tracking number ending in 8037 38 and seized approximately 8 gross grams of presumptive methamphetamine. TFO's observed similar mailings to MARTIN addressed in her name to the Extended Stay America hotel located at 1221 N Watson RD, Room #171, Arlington, TX 76006-6250 from this date through August 2020. TFOs observed MARTIN's vehicle was routinely parked at this location from May 2020 to August 2020.

8. On November 6, 2020, TFOs conducted surveillance at the Valley Ranch Post Office located at 8501 N MacArthur RD, Irving, TX 75063. On this date, TFOs observed the Mercedes Benz ML 350, driven by MARTIN, enter the customer parking lot of the facility. MARTIN exited her vehicle and retrieved a USPS mail tub full of parcels which she carried into the post office. TFOs documented the parcels mailed by MARTIN and observed 11 Priority Mail parcels and 4 Priority Mail Express parcels. All the parcels listed the return address of "SUNISH VALAPPILE KANDY, 9511 VALLEY RANCH PKWY E, APT 1036, IRVING, TX 75063." TFOs retained two of these parcels for further investigation: a USPS Priority Mail parcel bearing tracking number ending in 1598 74 addressed to MONTEREY PARK CA 91754-7430 and a USPS Priority Mail Express parcel bearing tracking number ending in 1589 27 addressed to FRISCO TX 75033-1153.

9. On November 17, 2020, TFOs executed federal search warrants for the following parcels previously retained: USPS Priority Mail parcel bearing tracking number ending in 1598 74 addressed to MONTEREY PARK CA 91754-7430, and USPS Priority Mail Express

parcel bearing tracking number ending in 1589 27 addressed to FRISCO TX 75033-1153. TFOs seized a total of approximately 208 mL of a clear liquid, suspected to be Gamma-Hydroxybutyric Acid (GHB), a Schedule I substance, or Gamma-Butyrolactone (GBL), an analogue of GHB regulated as a List I controlled chemical and Schedule I substance, concealed in contact lens solution bottles, from the two parcels mailed by MARTIN.

10. On February 22, 2021, TFOs were notified that MARTIN deposited multiple parcels at the Valley Ranch Post Office on this date. TFOs documented that MARTIN mailed 7 Priority Mail Express parcels and 10 Priority Mail parcels. All the parcels listed a return address of "HJ MARTI, 9509 VALLEY RANCH PKWY E, APT 2025, IRVING, TX 75063" and were mailed to various locations throughout the United States. TFOs retained one of these parcels for further investigation: a USPS Priority Mail parcel bearing tracking number ending in 0337 05 addressed to AUSTIN TX 78728-3504. TFOs reviewed surveillance video from this transaction which showed MARTIN mailing the parcels.

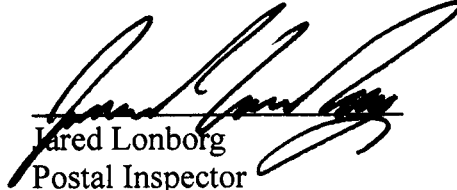
11. On February 25, 2021, TFOs executed a federal search warrant for USPS Priority Mail parcel bearing tracking number ending in 0337 05 addressed to AUSTIN TX 78728-3504 and seized approximately 355 mL of a clear liquid, suspected to be GHB/GBL, concealed in a contact lens solution bottle.

12. On June 3, 2021, TFOs executed a federal search warrant at MARTIN's residence. TFOs discovered large amounts of GBL and GHB, methamphetamine, USPS shipping and packaging supplies, contact lens solution bottles, mylar bags, and a conversion lab to convert GBL to GHB.

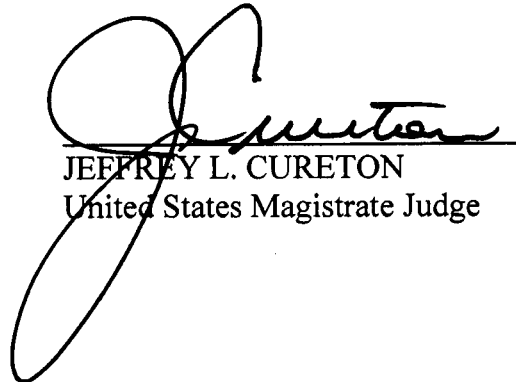
13. On June 3, 2021, TFOs interviewed MARTIN regarding her drug trafficking activities. MARTIN advised that she orders GBL from China and converts some of the GBL to GHB and sells both GBL and GHB on the dark web. MARTIN stated she is a methamphetamine user and orders methamphetamine on the dark web for personal use.

14. Throughout the investigation, TFOs were able to determine that MARTIN is the individual mailing USPS parcels containing narcotics from multiple post offices around the DFW area, in addition to receiving parcels containing narcotics. To date, outbound mailings associated with the MARTIN DTO are estimated to be over 1,600 throughout the United States using various fictitious shipper names and addresses.

15. Based upon the foregoing facts and information, I respectfully submit that there is probable cause to believe that **Hyun Ji Martin** did conspire with another individual to possess with intent to distribute a controlled substance in violation of 21 U.S.C. § 846 (21 U.S.C. § 841(a)(1) and (b)(1)(C)).

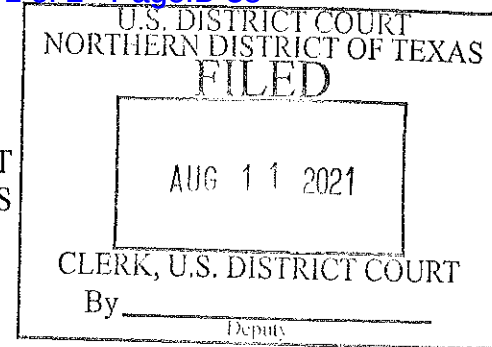

Jared Lonborg
Postal Inspector
U.S. Postal Inspection Service

Sworn to before me, and subscribed in my presence on June 4, 2021 at 10:26 a.m., at Fort Worth, Texas.


JEFFREY L. CURETON
United States Magistrate Judge

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

HYUN JI MARTIN (01)

No. 4:21-CR-164-Y

FACTUAL RESUME

INDICTMENT: Conspiracy to Possess with Intent to Distribute a Controlled Substance, in violation of 21 U.S.C. § 846 (21 U.S.C. § 841(a)(1) and (b)(1)(C)).

MAXIMUM PENALTY:

- Imprisonment for a period not more than 20 years;
- A fine not to exceed \$1,000,000 or both a fine and imprisonment;
- A supervised-release term of not less than 3 years. If the defendant violates any of the supervised-release conditions, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement;
- A \$100 mandatory special assessment;
- Restitution to victims or to the community; and
- Forfeiture of property.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offense charged in the Information/Indictment are as follows:


- First: That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute a controlled substance, as charged in the Information/Indictment;
- Second: That the defendant knew of the unlawful purpose of the agreement; and
- Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose.

STIPULATED FACTS:

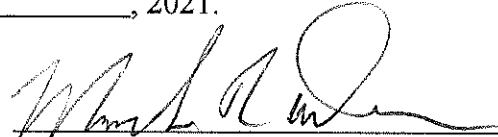
Beginning at least as early as March 23, 2020, and continuing into June 2021, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendant **Hyun Ji Martin**, and others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C § 841(a)(1) and (b)(1)(C), namely to possess with intent to distribute a mixture and substance containing a detectable amount of Gamma-Hydroxybutyric Acid (GHB), a Schedule I controlled substance.

Beginning at least as early as March 2020, and continuing until June 2021, **Hyun Ji Martin** obtained Gamma-Hydroxybutyric Acid (GHB) and other narcotics from sources in China and other locations. **Martin** sold GHB and other narcotics to customers over the dark web. **Martin** operated out of an apartment in Irving. She was observed on multiple occasions receiving and mailing drug parcels, and investigative parcel searches consistently revealed that **Martin** was obtaining and selling narcotics. On June 3, 2021, investigators executed a search at **Martin's** residence. They found large amounts of GHB and other narcotics, as well as packaging material. In a post-*Miranda* interview, **Martin** confessed to the scheme to receive and distribute GHB and other narcotics.

SIGNED this 7TH day of AUGUST, 2021.



HYUN JI MARTIN
Defendant



MARK DANIELSON
Counsel for Defendant

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

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UNITED STATES OF AMERICA

v.

No.

4:21-cr-164-Y

HYUN JI MARTIN (01)

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846 (21 U.S.C. § 841(a)(1) and (b)(1)(C)))

Beginning no later than on or around March 23, 2020, and continuing into and including June 3, 2021, in the Fort Worth Division of the Northern District of Texas, **Hyun Ji Martin**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C), namely to possess with intent to distribute Gamma-Hydroxybutyric Acid (GHB), a Schedule I controlled substance.


In violation of 21 U.S.C. § 846 (21 U.S.C. § 841(a)(1) and (b)(1)(C)).

A TRUE BILL.



FOREPERSON

PRERAK SHAH
ACTING UNITED STATES ATTORNEY


for ROBERT S. BOUDREAU
Assistant United States Attorney
New York State Bar No. 4686507
801 Cherry Street, Suite 1700
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Telephone: 817-252-5200
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

THE UNITED STATES OF AMERICA

v.

HYUN JI MARTIN (01)

INDICTMENT

21 U.S.C. § 846 (21 U.S.C. § 841(a)(1) and (b)(1)(C))
Conspiracy to Possess with Intent to Distribute a Controlled Substance
1 Count

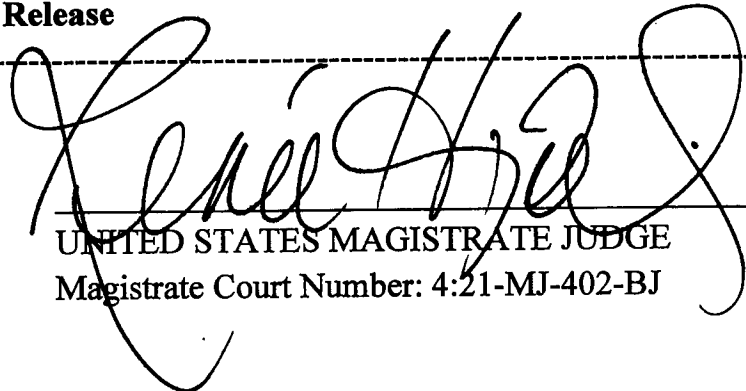
A true bill rendered

DALLAS

 FOREPERSON

Filed in open court this 22nd day of June, 2021.

Defendant on Pretrial Release


UNITED STATES MAGISTRATE JUDGE
Magistrate Court Number: 4:21-MJ-402-BJ