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

Alexandria Division

UNITED STATES OF AMERICA v. VLADISLAV VITALIEVICH CHERNYSHOV and, STANISLAV VITALIEVICH CHERNYSHOV, *Defendants*.	Case No. 1:26-mj-336 **UNDER SEAL**

AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANTS

I, Mickey Bigg, being duly sworn, depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

1. This affidavit is submitted in support of a criminal complaint and arrest warrant charging that on or between May 5, 2021 and the present, within the Eastern District of Virginia and elsewhere, the defendants, Stanislav Vitalievich CHERNYSHOV (hereinafter referred to as "S CHERNYSHOV") and Vladislav Vitalievich CHERNYSHOV (hereinafter referred to as "V CHERNYSHOV"), did knowingly and intentionally combine, conspire, confederate, and agree with others, known and unknown, to unlawfully, knowingly, and intentionally distribute controlled substances, including a mixture and substance containing a detectable amount of benzimidazole opioids, commonly known as nitazenes, specifically to include: Protonitazene, Metonitazene, N-Pyrrolidino Etonitazene, and N-Pyrrolidino Isotonitazene, all Schedule I controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846. As set forth in greater detail below, S CHERNYSHOV and V CHERNYSHOV have been identified by law enforcement

distributing counterfeit oxycodone pills containing controlled substances, among other items, utilizing vendor accounts on the darknet operating under the monikers "BarbaraWhite" and "BarbaraWhite1" to advertise and conduct narcotics transactions, as well as depositing packages containing controlled substances at USPS collection boxes. Further, based on the acquisition of components for the manufacture of counterfeit oxycodone pills, your affiant believes S CHERNYSHOV, V CHERNYSHOV, and their co-conspirators to be domestically manufacturing counterfeit oxycodone pills.

2. I am a police officer with the Arlington County Police Department ("ACPD") and have been so employed since July 2013. In 2019, I was promoted to the rank of detective and assigned to the Drug Enforcement and Vice Unit within the Organized Crime Section. In September 2021, I was appointed as a Task Force Officer ("TFO") with the Federal Bureau of Investigation ("FBI"), specializing in transnational organized crime matters, to include darknet-related drug trafficking. I am currently responsible for the enforcement of the statutes of the Virginia Code pertaining to the possession and distribution of narcotics and controlled dangerous substances as well as federal drug trafficking laws under Title 21 of the United States Code. As such, I am a Law Enforcement Officer as defined under 18 U.S.C. § 2510(7) (i.e. an officer of the United States of a political sub-division thereof, who is empowered to conduct investigations of, and to make arrests for, offenses enumerated in Title 21, United Stated Code).

3. As a narcotics investigator, I have participated in the application for and execution of many state and federal search warrants related to the investigation of narcotics and organized crime related offenses, resulting in the prosecution and conviction of numerous individuals and the seizure of illegal drugs, drugs proceeds in the form of bulk U.S. currency, weapons, and other evidence of criminal activity. Additionally, I have interviewed many individuals involved in drug

trafficking and have obtained information from them regarding the acquisition, sale, importation, manufacture, and distribution of controlled substances. Through training and my experience, I am familiar with the methods used by traffickers of controlled substances and the nature and appearance of illegal narcotics. I have received extensive training in drug identification, drug distribution methods, and drug enforcement techniques from various federal, state, and local agencies, including the ACPD, the Northern Virginia Criminal Justice Academy, the Drug Enforcement Administration ("DEA"), and the FBI, among others. Additionally, I have extensive training and experience related to the methods and processes used by darknet drug traffickers through my position as an FBI TFO.

4. Unless specifically indicated otherwise, all conversations, statements, and events described in this affidavit are relayed in substance and in part only, all amounts or sums are approximate, and all dates and times are on or about those indicated. This affidavit also reflects my current understanding of the facts related to this investigation, but my understanding may change in the future as the investigation proceeds.

5. 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.

PROBABLE CAUSE

I. Background on Nitazenes

6. As set forth in further detail below, during the course of this the investigation, law enforcement has made controlled purchases of round blue pills imprinted with an "M" and "30," which mimic the markings associated with pharmaceutically manufactured oxycodone 30 milligram (mg) pills. Law enforcement officers commonly find narcotics dealers selling round blue pills imprinted with "M" and "30". The widespread distribution of the counterfeit pills has led the pills to be marked by popular culture terminology such as "blues," "M-30s," "Perc's," and "Perc-30's." "Perc" is a commonly used slang reference that is short for "Percocet," which is a name brand prescription pain killer that contains oxycodone and acetaminophen. It is common in the Eastern District of Virginia, and throughout the United States, for counterfeit pressed pills containing fentanyl, heroin, or other opioids to be manufactured to look like legitimate pharmaceutically produced oxycodone pills. Counterfeit pills may contain lethal amounts of synthetic opioids, such as fentanyl and/or nitazenes, and are extremely dangerous because they often appear identical to legitimate prescription pills, and the user may be unaware of what substances the pills contain and how lethal they can be.

7. Historically, counterfeit pressed M30 pills contained primarily fentanyl; however, in recent years, pill seizures have revealed pills containing heroin, nitazene-class synthetic opioids, morphine derivatives, and other opioids. On occasion, confidential sources or undercover officers will negotiate for the purchase of fentanyl pills and later lab testing will reveal the pills did not contain fentanyl but contained another opioid substance, such as heroin.

8. Laboratory analyses of law enforcement controlled purchases in this case have revealed the pills to contain Benzimidazole-opioids or nitazenes, to include at least Protonitazene, Metonitazene, Ethyleneoxynitazene, N-Pyrrolidino Etonitazene and, N-Pyrrolidino Isotonitazene.

9. According to the Drug Enforcement Administration (DEA), benzimidazole-opioids, commonly referred to as "nitazenes," emerged on the recreational drug market in 2019.[1] The Drug Enforcement Administration (DEA) has temporarily or permanently scheduled multiple nitazene compounds under Schedule I of the Controlled Substances Act due to their high abuse potential and lack of accepted medical use. According to the DEA, nitazenes are "synthetic opioids similar to fentanyl but can match or surpass the potency of fentanyl."[2] Molecular studies of nitazenes have indicated these powerful compounds to be hundreds to thousands of times more potent than morphine and stronger than fentanyl. The potency of the nitazene compounds can lead to prolonged respiratory depression and eventual respiratory arrest, especially in the opioid-naïve, resulting in death.[3]

10. Each of the Nitazenes encountered in this investigation have now been either temporarily or permanently ordered as a schedule I controlled substance via the Controlled Substances Act. The dates of scheduling for each nitazene encountered in this investigation, as well as the first date each was encountered in the course of the investigation, are set forth below.

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1 Source: Schedules of Controlled Substances: Temporary Placement of N-Pyrrolidino Metonitazene and N-Pyrrolidino Protonitazene in Schedule I, 90 Fed. Reg. 39314 (Aug. 15, 2025)(to be codified at 21 C.F.R. pt. 1308).

2Source: Drug Enforcement Administration, 2025 National Drug Threat Assessment (May 2025), *available at* https://www.dea.gov/sites/default/files/2025-07/2025NationalDrugThreatAssessment.pdf (hereinafter "2025 NDTA").

3 Source: Nitazenes: the Emergence of a Potent Synthetic Opioid Threat, J. Pereira et al, 2025, https://doi.org/10.3390/molecules30193890.

As reflected below, not all of the nitazenes encountered in this investigation were scheduled at the time that they were distributed.

Substance	Date of Temporary Scheduling Order	Date of Permanent Scheduling Order	Date First Encountered in this Investigation	Date Most Recently Encountered in this Investigation
Protonitazene	April 12, 2022[4]	April 11, 2024[5]	May 15, 2023	May 15, 2023
Metonitazene	April 12, 2022	August 18, 2023[6]	May 15, 2023	June 24, 2024
N-Pyrrolidino Etonitazene	April 12, 2022	April 11, 2024[7]	November 13, 2024	November 13, 2024
N-Pyrrolidino Isotonitazene	October 15, 2025[8]	N/A, still under temporary order	November 2, 2024	June 23, 2026

11. Despite the federal efforts to schedule nitazenes, law enforcement continues to encounter unscheduled, dangerous nitazenes in the United States. The DEA has found that chemical suppliers, mainly located in China, introduce new nitazenes when the ones currently on the market become riskier to produce due to regulatory actions and drug scheduling.[9] In the past

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[4] Schedules of Controlled Substances: Temporary Placement of Butonitazene, Etodesnitazene, Flunitazene, Metodesnitazene, Metonitazene, N-Pyrrolidino etonitazene, and Protonitazene in Schedule I, 87 Fed. Reg. 21556 (April 12, 2022)(to be codified at 21 C.F.R. pt. 1308).

[5] Schedules of Controlled Substances: Placement of Etodesnitazene, N-Pyrrolidino Etonitazene, and Protonitazene in Schedule I, 89 Fed. Reg. 25514 (April 11, 2024)(to be codified at 21 C.F.R. pt. 1308). Since the permanent scheduling orders cite to the date of temporary scheduling, hereinafter citations will only be to the relevant permanent scheduling orders.

[6] Schedules of Controlled Substances: Placement of Metonitazene in Schedule I, 88 Fed. Reg. 56466 (Aug. 18, 2023)(to be codified at 21 C.F.R. pt. 1308).

[7] Schedules of Controlled Substances: Placement of Etodesnitazene, N-Pyrrolidino Etonitazene, and Protonitazene in Schedule I, 89 Fed. Reg. 25514 (April 11, 2024)(to be codified at 21 C.F.R. pt. 1308).

[8] Schedules of Controlled Substances: Temporary Placement of Ethyleneoxynitazene, Methylenedioxynitazene, 5-Methyl Etodesnitazene, N-Desethyl Etonitazene, N-Desethyl Protonitazene, N,N-Dimethylamino Etonitazene, and N-Pyrrolidino Isotonitazene in Schedule I, 90 Fed. Reg. 48259 (Oct. 15, 2025)(to be codified at 21 C.F.R. pt. 1308)

[9] 2025 NDTA at 28.

year, multiple bipartisan bills have been introduced in Congress seeking class-wide scheduling[10] for Nitazenes.[11]

12. Not only do manufacturers seek to avoid regulation, but law enforcement detection of nitazenes in the drug supply and amongst fatal overdoses can be remarkably difficult. For example, I know from my training, experience, and experience in this investigation that many routine drug tests and toxicology screenings do not detect nitazenes.

II. Background on Cryptocurrency and Darknet Markets

13. 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.

14. Individuals typically purchase narcotics through darknet markets from "vendors," who accept digital currency, such as Bitcoin and Monero, 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

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10 Similar class wide scheduling was enacted in 2018 to place fentanyl-related substances as a class in Schedule I under the Controlled Substances Act.

11 *See, e.g.* The Nitazene Control Act, H.R. 5032, 119th Congress (2025); Strengthening Tools to Outlaw Poisonous (STOP) Nitazenes Act, H.R. 7970, 119th Congress (2026). The STOP Nitazenes Act in particular passed through the House Energy and Commerce Committee in July 2026, but has not yet become law.

same moniker across multiple marketplaces. Based on customer reviews, vendors can become well known as "trusted" vendors.

15. "Virtual currency" or "cryptocurrency" is a form of online payment that uses cryptography to secure financial transactions. Cryptocurrency transactions may be recorded on a "blockchain," which is a cryptographically verified ledger of every transaction that occurs in a particular currency. Cryptocurrency transactions can be conducted with multiple inputs and multiple outputs to a single transaction. Cryptocurrency transactions take place between "addresses" on a blockchain, and a transfer of funds from a sender to a recipient may be broken into multiple transactions that follow different paths to the same destination. One individual may control multiple "addresses," sometimes all as part of a single "account" or "wallet."

16. "Bitcoin," or "BTC", is a common form of cryptocurrency. The BTC blockchain, or ledger, is publicly available. Users can view the movement of BTC from one "address" to another on the BTC blockchain. The BTC blockchain identifies the addresses and BTC amounts involved in transactions but does not identify who owned or controlled a particular address at any particular time. A BTC "Transaction ID number" uniquely identifies a particular BTC transaction. A BTC deposit address is a unique identifier that serves as a virtual location to which BTC can be sent. Most BTC users employ software that creates and manages a "wallet." The wallet software creates and controls "addresses" that are used to hold, send, and receive BTC.

17. The passcodes allowing users to access a bitcoin wallet, and transfer the bitcoin contained within it, may be stored on mobile devices, external or removable media, or computers. These passcodes can also be represented as long strings of characters, machine readable bar codes (QR codes), or hidden within other innocuous looking data such as image files. Private keys and "seed phrases" (specialized passphrases that can be used to regenerate private keys), can also be

stored on paper. Seed phrases are usually only maintained by the individual(s) that opens or accesses the cryptocurrency wallets. Because these seed phrases can be utilized to access the cryptocurrency wallet, individuals usually keep their access hidden and secret. Again, passwords for access to electronic wallets are typically complex and are often written down or saved in an accessible manner on paper or on some electronic device.

18. "Monero," or XMR, is another type of cryptocurrency. Unlike the bitcoin blockchain, the Monero blockchain is not publicly viewable. As described on the website getmonero.org, Monero is a "Private, decentralized cryptocurrency that keeps your finances confidential and secure." Monero includes a variety of features that help to obscure transactions and their true origins and destinations. Due to these enhanced security features, Monero is sometimes classified as a "privacy coin." Monero can be used to obfuscate the origins and destinations of cryptocurrency transactions by exchanging one cryptocurrency for Monero, where cryptocurrency transactions cannot be readily observed, and then exchanging from Monero back into another cryptocurrency, such as bitcoin.

19. PGP or "Pretty Good Privacy" is software that allows for the encryption and decryption of text and files. GPG or "GNU Privacy Guard" is an open-source implementation of PGP that is free. PGP/GPG encryption uses two "keys" referred to as the Public Key and the Private Key. A user's Public Key, as the name implies, is meant to be shared widely to allow people to encrypt messages to the user. The recipient then uses their private key to decrypt a message or file that was encrypted using their public key. In practice, this means that Private Keys are not widely shared to maintain their integrity and security, but that Public Keys must be made available to others to facilitate encrypted communication. As part of generating a Public Key and a Private Key, also referred to as a "Key Pair," users may, but are not required to, provide an e-

mail address and/or name or moniker that may be incorporated into the header of the Public Key and subsequently visible when the public key is imported into PGP/GPG software. Additionally, vendors typically maintain and display the same PGP Public Key across different markets and, sometimes, different vendor names to prove their identity as the same vendor.

III. Background on Internet Protocol (IP) Addresses and Virtual Private Networks (VPNs)

20. Every device that connects to the Internet is assigned an Internet Protocol (IP) address. An IP address functions similarly to a mailing address for Internet communications, allowing data to be transmitted between devices through service providers and applications. In many circumstances, an IP address can be associated with a particular Internet Service Provider (ISP) account and, through legal process directed to the ISP, may be traced to the subscriber using that Internet connection at a specific date and time.

21. A VPN is a technology that encrypts Internet traffic and routes it through servers operated by a third-party VPN provider before it reaches its destination. As a result, websites, online services, and investigators generally observe the IP address of the VPN server rather than the user's actual residential or business IP address.

22. VPN technology has many legitimate uses. Individuals and businesses commonly use VPNs to protect privacy, secure communications on public Wi-Fi networks, safeguard corporate data, and access business resources remotely. The use of a VPN is not, by itself, indicative of criminal activity.

23. However, VPN services may also be used by individuals engaged in cybercrime to make attribution more difficult. By routing Internet traffic through VPN servers, a user can obscure the true source of an Internet connection, complicating efforts to identify the originating IP

address. Some VPN providers operate servers in multiple countries,[12] permit anonymous methods of payment, and maintain limited or no connection logs, all of which may further hinder investigative efforts. From my training and experience, I know that VPN services are nearly inherent in use by those accessing the darknet to obfuscate their identity and conceal their activity online from law enforcement.

IV. History of the Darknet Vendor "BarbaraWhite"

24. In May 2023, Drug Enforcement Administration ("DEA"), Columbus, OH, opened an investigation into the darknet vendor "BarBaraWhite."[13] In April 2024, the United States Postal Inspection Service ("USPIS") Washinton Division, ACPD, and Federal Bureau of Investigation Washington Field Office, entered into the investigation following a fatal drug overdose in Arlington, Virginia. Following a subsequent fatal drug overdose in Frisco, Texas in November 2025, USPIS Ft. Worth Division, USPIS Miami Division, and the Clay County Sheriff's Office joined the investigation.

25. BarbaraWhite[14] is a moniker utilized by an individual or group of individuals to advertise controlled substances on darknet markets. Based upon a Dread[15] post, BarbaraWhite has

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12 Many of which are not responsive or required to respond to U.S. legal demands.

13 It should be noted that the vendor BarBaraWhite is known to alternate between using the name "BarBaraWhite" and "BarBaraWhite1" depending on the darknet market that they are listed on. Law enforcement knows these two monikers to be operated by the same person(s) based upon both vendors having the same PGP key, as well as other similarities identified across the accounts. This affidavit will refer to the darknet Vendor as "BarBaraWhite" for purposes of clarity and continuity.

14 BarbaraWhite also used the moniker BarbaraWhite1 on Archetyp darknet market. They reported that they lost the info for the BarbaraWhite account after making an account "long ago". Law enforcement verified BarbaraWhite and BarbaraWhite1 were operated by the same individual(s) through comparison of the matching PGP keys.

15 Dread Forum is the leading dark web discussion platform, often referred to as the "Reddit of the darknet." Source: https:dreadforum.io

been operating on darknet markets since at least November 2020.[16] Since that time, BarbaraWhite has advertised quantities of "TOP SHELF CRYSTAL METH," "SYNTHETIC CHINA WHITE SUPER POTENT FENT FREE[17]," and "Pressed NON FENTANYL M30 OXYCODONE Pills"[18] for sale over the years on various major darknet markets to include at least White House Market, Bohemia, Torzon, DrugHub, Archetyp, Darkmatter, Incognito, and Nemesis. As of at least as recently as July 31, 2026, BarbaraWhite still maintains a presence on multiple darknet markets advertising pressed M30 non-fentanyl oxycodone pills. A screenshot of products currently listed for sale by BarbaraWhite on the DrugHub darknet market is below. These images were captured on or about July 22, 2026.

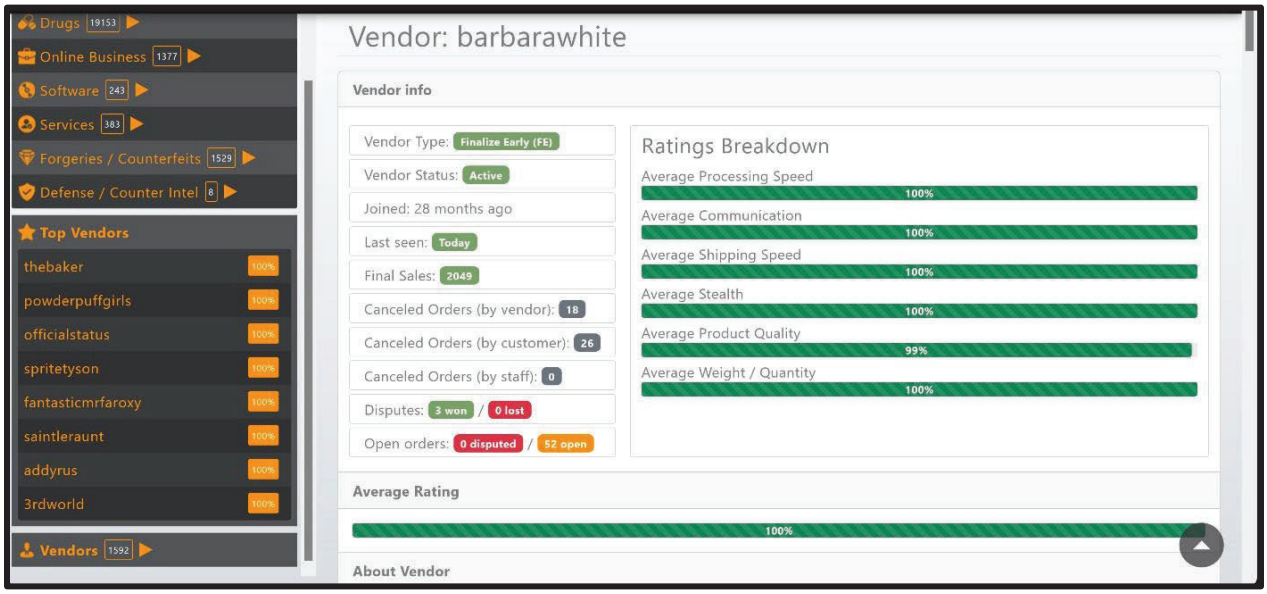
[CONTINUED ON NEXT PAGE]

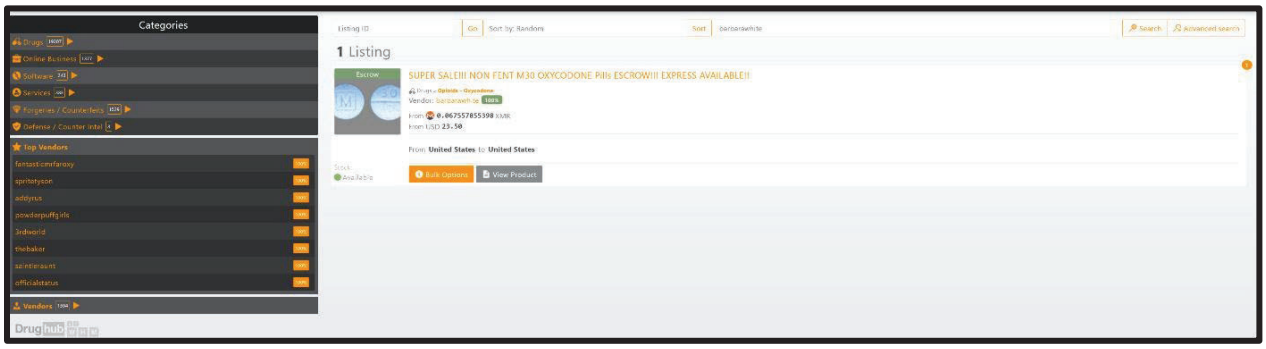
16 BarbaraWhite's first identified engagement on the forum DREAD was on or about November 30, 2020 where they advertised controlled substances for sale, indicating they are a new vendor on "WHM" and were offering free samples of "White Xanax X2 Clonazolam bar samples" that are "pressed with Pure CLAM dosed at 1.2 mg in each bar!". Your Affiant believes "WHM" stands for White House Market, a popular darknet market at the time of the post. Additionally, your Affiant believes CLAM to be slang for "Clonazolam", a benzodiazepine. It should be noted that the active ingredient in "Xanax" is alprazolam, which is a benzodiazepine similar to Clonazolam.

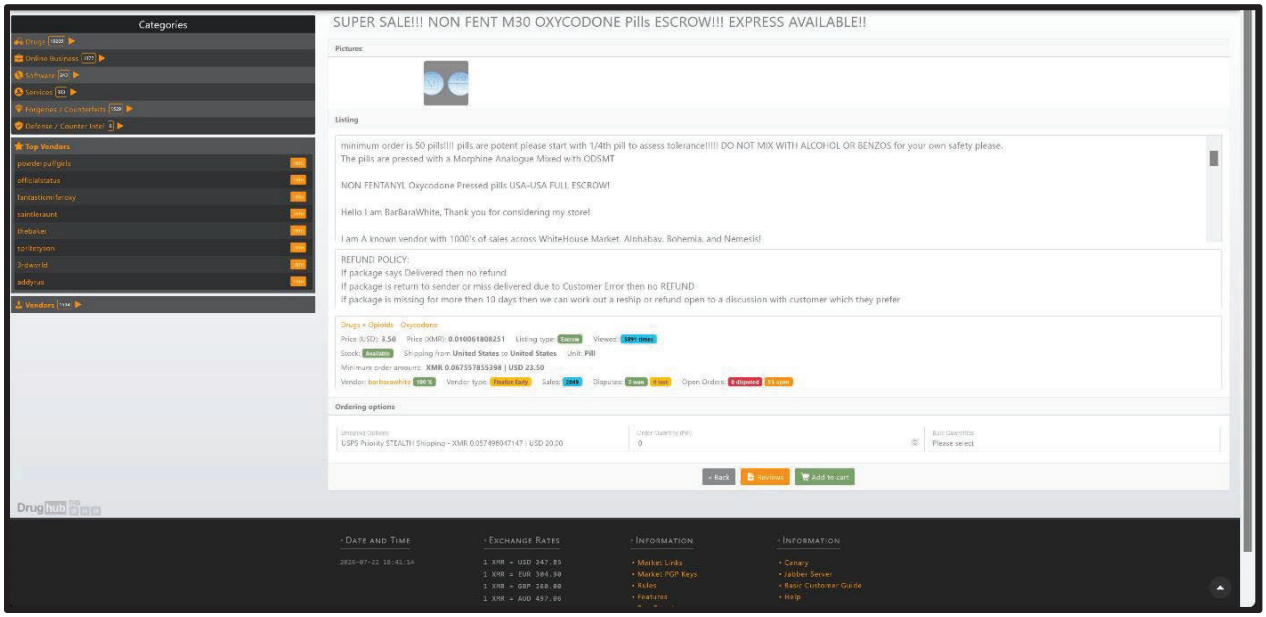
17 "Fent Free" is slang for fentanyl free, meaning the pills are free of fentanyl.

18 Based on my training and experience, "pressed" indicates counterfeit pills.

BarbaraWhite listings and profile on DrugHub Market







26. The first identified instance of BarbaraWhite advertising Oxycodone "M30" pills for sale occurred on May 5, 2021, in a Dread forum post indicating they were selling them on White House Market. In this post, BarbaraWhite indicated the pills did not contain fentanyl. In a comment on the post, BarbaraWhite indicated the pills contained a "METO/ETO[19]" mix. Since then, BarbaraWhite Oxycodone M30 pills have been marketed as "FENT FREE" on various markets and still are.

27. Based on my training and experience, I know that, while the oxycodone pills may seem safer since they are marketed as "fent free," it is a misnomer. As noted above, the substances identified in these "fent free" pills have been found to be either as potent or *more* potent than fentanyl. Further, BarBaraWhite has been identified on multiple occasions promising customers that the products do not contain "zenes," a common shorthand for the highly potent nitazenes that law enforcement has consistently identified in BarBaraWhite's M30 pills.

28. For example, in September 2024, a Dread user made an inquiry about the contents of Barbarawhite's pills. A conversation ensued with other users, with one stating Barbarawhite had told them it contained Desomorphine,[20] and speculating it could be improperly synthesized and unsafe. Barbarawhite ultimately responded stating that their product is a safe alternative to fentanyl and xylazine, further stating "I have been around for years we don't use FENT xylazine or any maps or zenes."[21]

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19 Law enforcement believes "METO/ETO" to mean Metonitazene and Etonitazene.

20 Desomorphine, also known by the slang term 'Krokodil' is a semi-synthetic opioid which gained notoriety for impure variants distributed and used in the Russian street drug market and led to visible distortion and loss of soft tissue, specifically the skin. Source: Life Sciences, *A "Krokodil" emerges from the murky waters of addiction*…, M. Katselou et al, 2014, https://doi.org/10.1016/j.lfs.2014.03.008

21 Law enforcement believes "zenes" to be slang for "Nitazenes" or Benzimidazole-opioids

29. In response to a post on Dread about the presence of fentanyl in pills found on the darknet on or about November 2025, BarbaraWhite commented they don't use fentanyl in their pills and advise all their customers to test for fentanyl. They indicated they use 300 mg ODMST[22] and 8mg dermorphin[23] and advise customers to use one-fourth of a pill at a time to assess tolerance. This similar advice to use one-fourth of a pill to assess tolerance is listed in their profile on their market pages. Investigators note that referencing ODMST and dermorphin would mislead and comfort a customer/opioid user by leading them to believe the pills contain a safer and/or natural compound. However, the recommendation for customers to take one-fourth of a pill to assess tolerance acknowledges the seller is aware of the true potency and strength of the product being sold. Furthermore, BarbaraWhite encourages their customers to test their product for fentanyl.[24] It should be noted that law enforcement has not encountered O-Desmethyltramadol, desomorphine, or Dermorphin throughout the course of this investigation.

V. Examples of BarbaraWhite's Quantities Sold on the DarkNet

30. Law enforcement has been able to obtain records for sales conducted by BarbaraWhite from Nemesis Market, Bohemia Market, and Archetyp marketplaces. Below is a chart showing conservative estimates of controlled substances sold by BarBaraWhite:

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22 ODMST or O-Desmethyltramadol, is a tramadol metabolite, and is being researched for safer pain management alternatives. ODMST is unscheduled and not approved for medicinal use. Source: Effects of the central analgesic tramadol and its main metabolite, O-desmethyltramadol…, J. Sevcik et al, 1993, https://doi.org/10.1111/j.1476-5381.1993.tb13788.x

23 Dermorphin is a hepta-peptide naturally derived from the skin of South American frogs. This peptide acts as a natural opioid and is 30-40 times stronger than morphine. Source: Pharmacological data on dermorphins…, M. Broccardo et al, 1981, https://bpspubs.onlinelibrary.wiley.com/doi/10.1111/j.1476-5381.1981.tb16797.x

24 Based on my training and experience, I know that for safety purposes, many opioid users test their products for fentanyl with test kits that can be utilized at home. A customer testing a BarbaraWhite tablet may further believe the tablet to be less dangerous as it would not test positive for fentanyl.

Market	Time Frame	Product	Number of Orders Marked Shipped	Estimate of Controlled Substances Sold
Nemesis	02/10/2023 – 03/20/2024	"Pressed NON FENTANYL M30 OXYCODONE Pills"	337	36,493 Pills
Nemesis	02/10/2023 – 03/20/2024	"Top Shelf Crystal Meth Shards"	96	Unknown[25]
Archetyp	03/06/2024 – 06/11/2025	"NON FENT M30 OXYCODONE PILLS"	283	23,253 Pills
Archetyp	03/06/2024 – 06/11/2025	"SYNTHETIC CHINA WHITE SUPER POTENT FENT FREE"	10	Unknown[26]
Bohemia	05/01/2021 to 11/16/2023	"Pressed NON FENTANYL M30 OXYCODONE Pills"	463[27]	35, 707 Pills
Bohemia	05/01/2021 to 11/16/2023	"TOP SHELF CRYSTAL METH"	34[28]	889 grams
Non-Darknet Market Transactions[29]	*Duration of conduct*	*Unknown*	*Unknown*	*Unknown*

25 The records that law enforcement has access to does not include a weight or baseline price to calculate the sale quantities.

26 The records that law enforcement has access to does not include a weight or baseline price to calculate the sale quantities.

27 48 orders were marked "shipped." 405 orders were marked "processed". 10 orders were marked "processing."

28 One order was marked shipped. 33 orders were marked "processed."

29 Investigators note that many darknet market vendors will conduct off-market transactions with their customers. These transactions are conducted off the Darknet Market platform and are often intended to avoid market fees, resulting in a better negotiated price for the customer and seller. Barbarawhite is known to conduct off-market transactions on other hidden service communication platforms, such as Dread. The scale, frequency, and number of these sales cannot be discerned by law enforcement

31. The data above is not representative of BarbaraWhite's total sales, as law enforcement has obtained records for just three of the markets that BarbaraWhite has operated on, and only for limited time periods.

VI. Law Enforcement Purchases of Substances from BarBaraWhite

32. Throughout the investigation, law enforcement has made multiple controlled purchases from BarbaraWhite.

33. For example, on April 2, 2024, an FBI Online Covert Employee ("OCE") acting in a covert capacity purchased "…NON FENT M30 OXYCODONE Pills…" through BarBaraWhite's vendor page on the Archetyp Market.

34. On April 12, 2024, the order, or Purchase of Evidence ("POE") was received at a law enforcement-controlled address within the Eastern District of Virginia and displayed a return address located on Sutton Estates Circle N., in Jacksonville, Florida. The package was identified by tracking number 940553790239565493478 3. Analysis of USPS business records indicated that the parcel originated in the Middle District of Florida ("MDFL"), but an exact location could not be ascertained.

35. Agents processed the parcel and located the narcotics concealed inside of a yellow bubble mailer. Subsequent lab testing at the Drug Enforcement Administration Laboratory yielded positive results for the presence of Metonitazene, a Schedule I controlled substance.

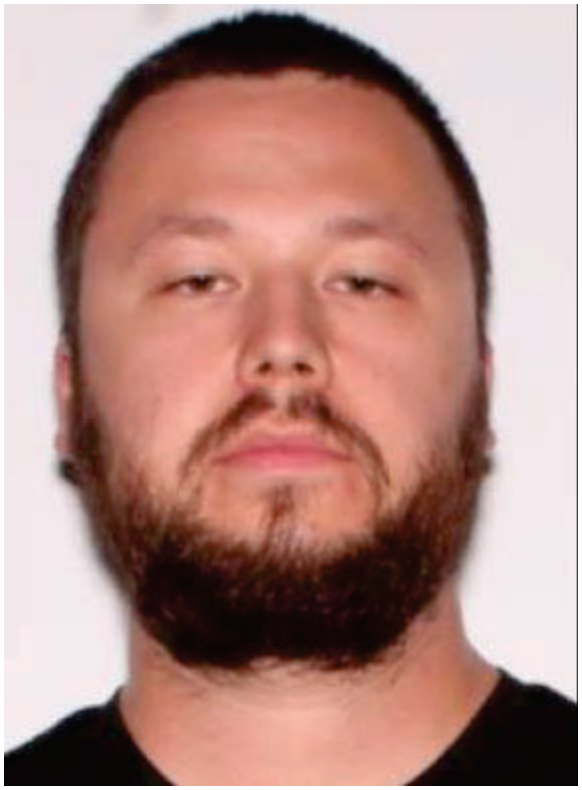
36. Throughout the course of the investigation, FBI and DEA OCEs have made at least 18 POEs from BarBaraWhite, as shown in the chart on the following page:

Date	Type Ordered	Lab Results	Mailed From
05/03/2023	50 non-fentanyl M30 Oxycodone Pills	Protonitazene; Metonitazene; and Ethyleneoxynitazene[30]	Jacksonville, Florida area
09/12/2023	50 non-fentanyl M30 Oxycodone Pills	Metonitazene	Jacksonville, Florida area
03/21/2024	100 non-fentanyl M30 Oxycodone Pills	Metonitazene	Jacksonville, Florida area
04/02/2024	100 non-fentanyl M30 Oxycodone Pills	Metonitazene	Jacksonville, Florida area
05/02/2024	100 non-fentanyl M30 Oxycodone Pills	Metonitazene	Jacksonville, Florida area
06/18/2024	100 non-fentanyl M30 Oxycodone Pills	Metonitazene	Jacksonville, Florida area
10/18/2024	100 non-fentanyl M30 Oxycodone Pills	N-Pyrrolidino Etonitazene	Jacksonville, Florida area
10/27/2024	200 non-fentanyl M30 Oxycodone Pills	N-Pyrrolidino Isotonitazene[31]	Jacksonville, Florida area
01/15/2025	300 non-fentanyl M30 Oxycodone Pills	N-Pyrrolidino Isotonitazene	Jacksonville, Florida area
03/14/2025	14 grams of Synthetic Heroin	N-Pyrrolidino Isotonitazene	Jacksonville, Florida area
05/18/2025	100 non-fentanyl M30 Oxycodone Pills	N-Pyrrolidino Isotonitazene	Jacksonville, Florida area
07/01/2025	100 non-fentanyl M30 Oxycodone Pills	N-Pyrrolidino Isotonitazene	Jacksonville, Florida area
09/08/2025	100 non-fentanyl M30 Oxycodone Pills	N-Pyrrolidino Isotonitazene	Jacksonville, Florida area
01/29/2026	200 non-fentanyl M30 Oxycodone Pills	N-Pyrrolidino Isotonitazene	Jacksonville, Florida area
4/23/2026	250 non-fentanyl M30 Oxycodone Pills	Pending Results from DEA Laboratory	Jacksonville, Florida area
05/04/2026	50 non-fentanyl M30 Oxycodone Pills	N-Pyrrolidino Isotonitazene	Jacksonville, Florida area
06/08/2026	50 non-fentanyl M30 Oxycodone Pills	N-Pyrrolidino Isotonitazene	Jacksonville Beach, Florida area
06/12/2026	50 non-fentanyl M30 Oxycodone Pills	Pending Results from DEA Laboratory	Jacksonville, Florida area

[30] According to the research report"Pharmacology of newly identified nitazene variants reveals structural determinants of affinity, potency, selectivity for mu opioid receptors" (https://pmc.ncbi.nlm.nih.gov/articles/PMC12147671/), , Ethyleneoxynitazene bears a chemical structure substantially similar to Etonitazene.

[31] In reviewing evidence in advance of charging, your Affiant recognized that several affidavits drafted in support of search warrants earlier in this investigation inadvertently listed the substance bought on this and later occasions as "N-Pyrrolidino Isonitazene" and simply "Isonitazene."

VII. Identification of Stanislav Chernyshov



Florida Driver's License Photo, May 12, 2025

37. Through intermittent analysis of U.S. Postal Service ("USPS") Business Records throughout the duration of the investigation, USPIS investigators identified additional parcels that, based on common characteristics, were associated with known parcels shipped from BarBaraWhite. During review, investigators noted many associated mail items were inducted into the U.S. Mailstream at a USPS collection box in the immediate vicinity of an address on Old Saint Augustine Road, Jacksonville, FL 32257 (hereinafter the "TARGET COLLECTION BOX").

38. On or about February 20, 2026, while reviewing USPS Business Records, USPIS investigators noted several Priority Mail labels were created that, based on common characteristics with POEs, were associated with known BarBaraWhite mailings. The mailings were all return addressed from Jacksonville, FL. Several of these mail items were addressed to known frequent recipient addresses of prior BarBaraWhite mailings.

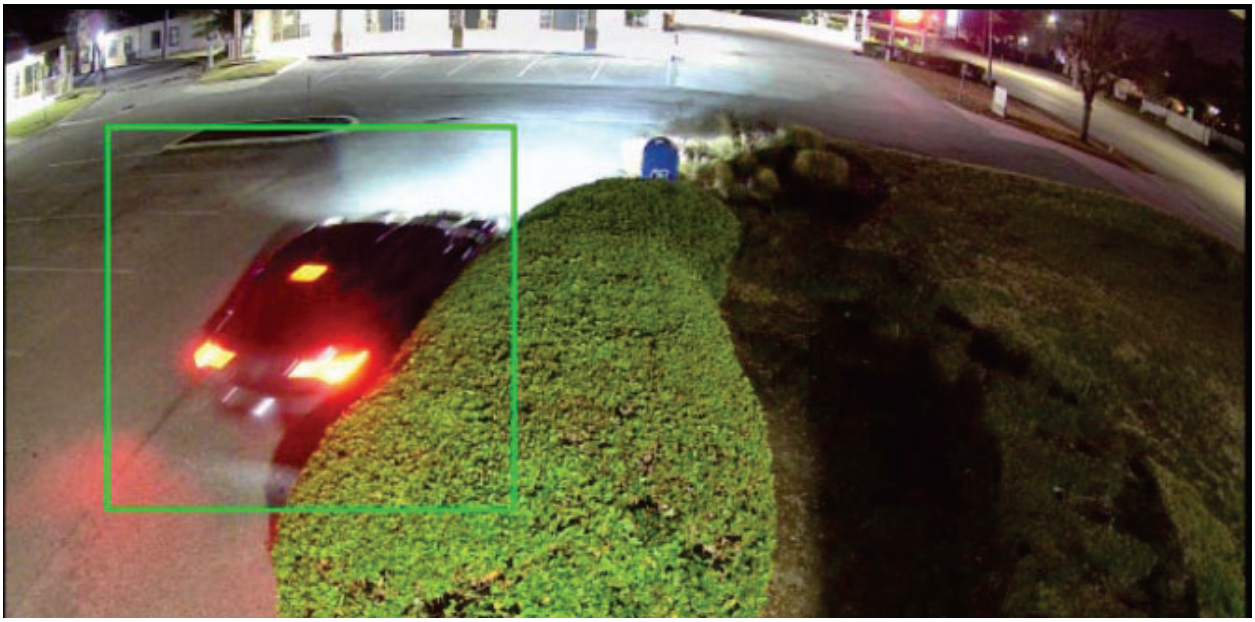
39. On or about February 24, 2026, USPIS investigators identified one such associated parcel with tracking number 9405536206249316912519, which was inducted into the U.S. Mailstream at the TARGET COLLECTION BOX on February 20, 2026. Investigators retrieved surveillance videos from the vicinity of the TARGET COLLECTION BOX. In review of the video, at the time stamp of approximately 3:25 a.m. EST, investigators observed a dark grey sedan pull up adjacent to the TARGET COLLECTION BOX, an individual get out of the driver's side door of the vehicle on foot, go to the trunk of the vehicle, and then go to the TARGET COLLECTION BOX, before re-entering the driver's side of the vehicle and departing. A still shot of the suspect vehicle matched the appearance of a vehicle observed from previous BarBaraWhite-associated mailings[32].

40. USPIS investigators reviewed images from a nearby security camera, which captured vehicle movement in the vicinity of the TARGET COLLECTION BOX on February 20, 2026, at approximately 3:24 a.m. EST. One such image is shown below. Upon review of these images, investigators determined the dark grey sedan was a 2021-2026 model Acura TLX sedan. Investigators also determined the sedan had unique premium wheels, which investigators know to typically be premium selected or after-market accessory items. The vehicle's license plate appeared to be removed, covered, or obscured from view. As will be discussed below, investigators later determined that this Acura TLX sedan is TARGET VEHICLE 1.

[CONTINUED ON NEXT PAGE]

32 Agent Note: Investigators were previously unable to identify the make and model of the vehicle from previous surveillance.

Still Shot of TARGET VEHICLE 1



41. Investigators queried 2021-2026 grey Acura TLX sedans registered to individuals residing in Duval County, Florida, which encompasses the city of Jacksonville, Florida. A review of those records cross-referenced with the unique wheel type, and law enforcement databases revealed that on or about February 5, 2026, at approximately 3:16 a.m. EST, a grey 2021 Acura displaying State of Florida license plate number ISNA28 (hereinafter "TARGET VEHICLE 1") was stopped by local law enforcement for an equipment violation. It should be noted that previous BarBaraWhite associated mailings had been inducted into the U.S. Mailstream at another USPS Collection Box (not the TARGET COLLECTION BOX) within a half mile of where the traffic stop occurred. Law Enforcement was unable to recover video of any parcels being placed into the mailstream from this location. The operator of the vehicle was S CHERNYSHOV, identified by law enforcement after providing his driver's license. Investigators reviewed Florida vehicle registration records which revealed that TARGET VEHICLE 1's registration/license plate number was issued to another individual with the last name Chernyshov, whom law enforcement records

indicate is the father of S CHERNYSHOV. Investigators later spoke to the officer who conducted this traffic stop and learned that TARGET VEHICLE 1 was equipped with a "vanish" or "blackout" plate cover device. These devices are remotely operated and can obscure a license plate at will by the operator in the vehicle's passenger compartment. S CHERNYSHOV admitted the existence and function of the device to the officer.[33]

42. In review of law enforcement databases, investigators learned images of the TARGET VEHICLE 1 were captured traveling in Northeast Florida in the early morning hours on February 20, 2026. TARGET VEHICLE 1 was identified in at least five locations between the hours of 2:53 a.m. EST and 3:43 a.m. EST. Between approximately 2:53 a.m. EST and 2:57 a.m. EST, TARGET VEHICLE 1 was captured travelling in a northwest direction towards the vicinity of TARGET COLLECTION BOX. Between approximately 3:40 a.m. EST and 3:43 a.m. EST, TARGET VEHICLE 1 was captured travelling in a southeast direction away from the vicinity of TARGET COLLECTION BOX. The projected travel times that it would take to drive between the location where TARGET VEHICLE 1 was captured and the vicinity of the TARGET COLLECTION BOX coincided with the time the dark grey sedan and its operator were at TARGET COLLECTION BOX.

43. In addition, USPIS personnel in Jacksonville, FL identified a Jacksonville Electric Authority (JEA) utilities account in the name of "Stanislav Chernyshov." One such prior address

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33 Records obtained by law enforcement from an online multinational monetary payment and transfer system platform revealed that S CHERNYSHOV purchased a "Blackout License Plate" on July 24, 2024. These records further indicate S CHERNYSHOV purchased a "Stealth Plate Flipper" on September 27, 2025, a device meant to swap between two license plates at the press of a button. Records indicate both items purchased were shipped to an address on Bartram Market Drive in Saint Johns, FL, 32259.

on this account was an address on Ballestero Drive South, Jacksonville, FL 32257, which was active from August 2025 until February 2026.

44. USPIS personnel conducted a review of USPS Business Records associated with the Ballestero Drive South address. This review revealed that 21 USPS First Class Mail parcels were delivered to "RICK JAMESON CSC LLC…Ballestero Drive South, Jacksonville, FL 32257" between and around February 5, 2026, and February 11, 2026. These 21 mail items were from Victory Packaging, the manufacturer of many free shipping supplies from USPS. In further reviewing USPS Business Records, it was revealed that these 21 mailings contained a total of 6,300 USPS EP14F envelopes. The EP14F is the same USPS Priority Mail Flat Rate Envelope utilized for the majority of BarBaraWhite mailings known to Law Enforcement. An example of this envelope is the Law Enforcement POE dated May 3, 2024:

Photo of Envelope, POE, May 3, 2024



45. Further review of USPS Business Records revealed the USPS Customer Account associated with the EP14F Envelope orders was "Industrialcandy123@Protonmail.com". Protonmail is a Switzerland-based end-to-end encrypted electronic mailing service that protects the identity and message contents of its users. Based on my training and experience, I know that Protonmail is a preferred method of electronic mail by users who wish to protect their identity and

privacy or attempt to remain anonymous. Many darknet vendors leverage Protonmail accounts for their electronic mail addresses and the anonymity its encryption services provide.

46. While reviewing USPS Business Records, USPIS investigators identified additional mailings associated with BarBaraWhite. These mailings were return addressed to St. Augustine, FL and were inducted in the U.S. Mailstream on February 27, 2026. The items received an acceptance scan between and around 12:13 p.m. EST and 12:14 p.m. EST at the TARGET COLLECTION BOX. USPIS investigators retrieved surveillance videos from the area and captured an unidentified person on a black motorcycle (hereinafter the "TARGET MOTORCYCLE") depositing mail items from a black backpack into the collection box from between and around 10:05 a.m. and 10:09 a.m. EST.

47. Records obtained by law enforcement from an e-commerce website indicated S CHERNYSHOV purchased "Motorcycle Pants for Men and Women Armored Cordura Overpants…" and "SHIMA OPENAIR Motorbike Jacket for Men…" on February 12, 2026, and a "kookoomia 50L Military Tactical Backpack Large Day Backpack…" on February 21, 2026. An image of the current listings for each item is on the following page:[34]:

34 Comparison of the purchased item listing images with observations made by law enforcement during surveillance as well as video and photo media recovered by law enforcement reveal the same characteristics as the clothing worn by the BarbaraWhite mailer.



Still Shot 1: Target Motorcycle



Still Shot 2: Target Motorcycle



48. USPIS investigators conducted a review of Florida vehicle registration records, which revealed S CHERNYSHOV was issued Florida license plate number 32QGL associated with the vehicle identifier number (VIN) MLHRH1656S5100289. Further reviews of proprietary Law Enforcement databases, which have proved to be reliable in the past, as well as an open-source website revealed the VIN MLHRH1656S5100289 was associated with a Honda model CB650 R motorcycle which was listed as owned by S CHERNYSHOV. Open-source review of images for black Honda model CB650 R motorcycles revealed a motorcycle with visually similar and matching characteristics to the TARGET MOTORCYCLE.

VIII. IDENTIFICATION OF TARGET LOCATION 1

49. A review of Florida Department of State Division of Corporations' records revealed S CHERNYSHOV is listed as the Treasurer of "VVS GROUP INC" located at 5100 Sunbeam Road, Suite 1, Jacksonville, FL 32257 (hereinafter "TARGET LOCATION 1"). He has been listed as Treasurer since the incorporation's founding in 2022.

50. A review of open-source information on Google.com revealed the above address was listed and displayed physical signage as "Victory Jewelers." A Google Maps photo captured December 2023 is displayed below.

Google Image of Victory Jewelers



51. Further review of open-source information on Google.com revealed operating hours from 11am – 6pm on Monday through Friday, 12-6pm on Saturday, and closed on Sunday.

52. In March 2026, law enforcement attempted to make an undercover customer interaction inside the business during business hours. The store's customer entrance was locked, and no lights or activity inside could be noted. Since the discovery of TARGET LOCATION 1, despite conducting surveillance on multiple occasions during TARGET LOCATION 1's purported business hours, law enforcement has never noted customers entering or exiting from the normal storefront entrance depicted above, nor have they noticed employees or persons otherwise at the business outside the attendance patterns described later herein by S CHERNYSHOV and V CHERNYSHOV.

53. In and around March 2026 through May 2026, law enforcement conducted surveillance at TARGET LOCATION 1 on approximately a dozen occasions. This surveillance has revealed a regular pattern that occurs several times per week. As part of this pattern, TARGET VEHICLE 1 arrives at TARGET LOCATION 1, parks on the south side of the building[35] and a subject,[36] exits TARGET VEHICLE 1 and enters TARGET LOCATION 1 in street clothes. The subject then wheels the TARGET MOTORCYCLE out of the store, exits TARGET LOCATION 1 with the TARGET MOTORCYLE. Upon exit, the subject is now wearing black motorcycle attire and a black tactical backpack. Law enforcement compared the motorcycle attire and black tactical backpack, and confirmed the characteristics appear to be identical to those captured in the image

35 The south side of the building is the rear portion, is non-customer facing, and has an alleyway with limited space for unmarked employee parking.

36 The subject is believed by law enforcement to be S CHERNYSHOV based on comparison to S CHERNYSHOV driver's license, observations made of S CHERNYSHOV on surveillance, as well as the frequency of operation of TARGET VEHICLE 1, its frequent pattern of movement, to include to and from S CHERNYSHOV's known residence, and operation of the TARGET MOTORCYCLE.

titled "Still Shot 1: Target Motorcycle," above. The TARGET MOTORCYCLE would then depart from TARGET LOCATION 1. Approximately 30-45 minutes later, the TARGET MOTORCYCLE returned to TARGET LOCATION 1. The TARGET MOTORCYCLE was wheeled back into the store, the subject exited in street clothes, returned to TARGET VEHICLE 1, and then TARGET VEHICLE 1 left TARGET LOCATION 1. Investigators have recovered additional recorded media of the TARGET MOTORCYCLE and its driver mailing additional Flat Rate Envelope parcels suspected to be attributable to Barbarawhite at the TARGET COLLECTION BOX during this timeframe and on dates wherein the above pattern is observed.

IX. IDENTIFICATION OF VLADISLAV CHERNYSHOV



Florida Driver's License Photo, September 5, 2022

54. A review of "VVS GROUP INC" in Florida Department of State Division of Corporations' records indicates V CHERNYSHOV has been listed as the business's vice president since its founding in 2022.

55. A review of open-source social media and law enforcement databases indicates S CHERYNSHOV and V CHERYNSHOV are brothers.

56. In and around April 2026 through May 2026, law enforcement surveillance of TARGET LOCATION 1 also revealed a regular pattern involving a Black 2023 Dodge Charger bearing Florida registration/license plate number, NRFC37 (hereinafter "TARGET VEHICLE 2"). Surveillance revealed that TARGET VEHICLE 2 often arrives at dawn and parks in the rear of TARGET LOCATION 1, after which a white male subject[37] exits the vehicle and enters TARGET LOCATION 1. The same subject then exits TARGET LOCATION 1 several hours later and departs in TARGET VEHICLE 2. TARGET VEHICLE 1 often arrives thereafter. This pattern regularly occurs on the same days as the pattern involving TARGET VEHICLE 1 and the TARGET MOTORCYCLE, described in paragraph 53, above.

57. Investigators conducted a review of Florida registration records and law enforcement databases, which revealed TARGET VEHICLE 2 is registered to V CHERNYSHOV.

a. Deposited Items Recovered Near Target Location 1

58. On or about May 6, 2026, while conducting surveillance, investigators noted a white male subject [*see footnote 37*] exit TARGET LOCATION 1 while TARGET VEHICLE 2 was present. The subject deposited a brown cardboard box into a refuse container behind the combined businesses of TARGET LOCATION 1's strip mall. Later that same day, law enforcement recovered the box from the refuse container. An image of the box's label as well as surveillance footage of the white male subject are below.

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[37] The subject is believed by law enforcement to be V CHERNYSHOV based on comparison to V CHERNYSHOV driver's license, observations made of V CHERNYSHOV on surveillance, as well as the frequency of operation of TARGET VEHICLE 2, its frequent origin and destination, to include to and from V CHERNYSHOV's residence

Image of Ripped Label from Deposited Box, May 6, 2026



Image of Individual Depositing Trash



59. USPIS Investigators compared the discernible information from the deposited box's label to USPS Business Records, which revealed that the deposited box had contained one of the orders of 6,300 USPS Priority Mail Flat Rate Envelopes addressed to "RICK JAMESON" described in paragraph 44 above.

60. On or about May 20, 2026, investigators conducted surveillance of TARGET LOCATION 1 while TARGET VEHICLE 2 was present. Investigators noted a white male, [*see footnote 37*] exit TARGET LOCATION 1, and deposit a black trash bag in the same refuse

container described in paragraph 58. An image from this surveillance is depicted below; TARGET VEHICLE 2 can be seen on the left side of the image.

Still Photo of May 20, 2026, Trash Deposit



61. Later that same day, investigators entered and inspected the refuse container, wherein they located a sole black trash bag and recovered it for further inspection. Law enforcement maintained constant visual on the refuse container and confirmed that no further deposits were made into the refuse container between the deposit depicted above and law enforcement's recovery of the sole black trash bag.

62. Later that same day, investigators extracted the contents of the black trash bag, which revealed the following: a large amount of "safety strips," which are found on the USPS Priority Mail Flat Rate Envelopes described in paragraph 44 above (these "safety strips" protect the glue seal strip prior to closing and mailing); a large amount of plastic strips from vacuum seal bags, which appeared to be the excess plastic after sealing the vacuum seal bags; a large amount of empty vacuum seal boxes and rolls; a large amount of rubber gloves; several hairnets; five

gallon zip lock bags with blue powder residue; and two blue pills with the marking of "M-30". The blue powder residue was field tested with a chemical analysis device. The field test indicated that the residue contained the chemical component N-Pyrrolidino Protonitazene, a similar synthetic drug as those detected from the POEs described in paragraph 36, above. Images of the contents located in the black trash bag are below.

Trash Contents Overview



Five-Gallon Zip Locks with Powder Residue



Blue Tablet embossed with "M-30"



63. Laboratory results later indicated that the above imaged contents which included one clear plastic bag containing one blue tablet and blue tablet fragments and six clear plastic zip-close bags containing blue powder—were all confirmed to contain the presence of N-Pyrrolidino Isotonitazene. As noted in the table above, an undercover POEs that was placed on May 4, 2026, was also laboratory-confirmed to contain N-Pyrrolidino Isotonitazene.

64. On or about June 15, 2026, similar events described in paragraphs 58, 59, and 60 occurred involving an individual believed by law enforcement to be V CHERYNSHOV depositing a black trash bag, which was tied closed. Upon recovery and inspection, investigators discovered three plastic Ziplock-style bags with blue residue, one bag also contained a round blue tablet reading "M" on one side and "30" on the reverse side. An aluminum Red Bull can was also located

inside the black trash back. The Red Bull can and plastic Ziplock-style bags were submitted to the USPIS laboratory for fingerprint analysis and drug analysis respectively. Laboratory results revealed that fingerprints found on the Red Bull can were a match for V CHERNYSHOV's fingerprints.[38] Laboratory results further indicated that the blue residue and blue tablet were confirmed for the presence of N-Pyrrolidino Isotonitazene. As noted in the table above, an undercover POEs that was placed on June 8, 2026, was also laboratory-confirmed to contain N-Pyrrolidino Isotonitazene.

X. Other Factors Known to Law Enforcement

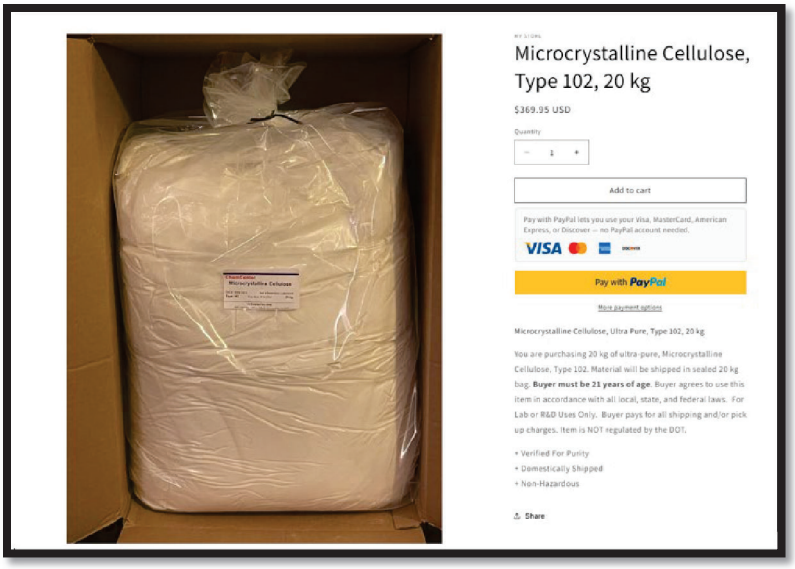
a. Clandestine Lab Materials

65. Records obtained by law enforcement from an online multinational monetary payment and transfer system platform indicate S CHERNYSHOV's account has purchased "Microcrystalline Cellulose, Ultra Pure, type 102, 5 kg." from a bulk lab materials company[39] on February 15, 2021. Though a current five-kilogram listing from the company could not be found, investigators found a current listing for twenty kilograms of Microcrystalline Cellulose:

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[38] Comparison prints of V CHERNYSHOV were obtained via U.S. Citizenship and Immigration Services records. Agent Note: V CHERNYSHOV and S CHERNYSHOV entered the U.S.A. in 2001 under H-4 Visas as juvenile dependents of their father, who entered the U.S.A. from Russia on a H-1B Work Visa status.

[39] From my training and experience, I know that Microcrystalline Cellulose is a powdered substance used legitimately and illegitimately as a binding agent. In illicit clandestine labs, drug manufacturers use this agent to maintain shape and solidity once pressed along with other fillers, drugs, and color additives.



66. USPIS investigators obtained a report from a Homeland Security Investigations (HSI) investigation into clandestinely manufactured fentanyl pills. The report indicated that HSI had received information that "James Waugh" was a known recipient of large quantities of Microcrystalline Cellulose powder in Jacksonville. The billing information for James Waugh included the email "industrialcandy123@protonmail.com,"[40] as well as a billing address on Boracay Circle, Saint Johns, FL 32259. A review of law enforcement databases showed S CHERNYSHOV to have been previously associated with that same Boracay Circle address.

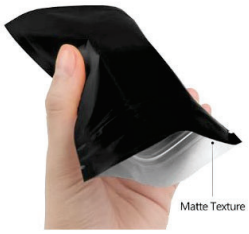
67. The aforementioned multinational online monetary payment and transfer system platform records further indicated transactions to a Chinese entity on December 18, 2024, for $1,000 and December 17, 2025, for $700. Additional records obtained by law enforcement from a separate multinational financial institute, which specializes in wire transfers indicate a phone number which was previously associated with S CHERNYSHOV in law enforcement databases, sent money to the same Chinese entity listed above via phone number 158 9009 6717, via a Chinese

[40] This is the same email from paragraph 44 associated with bulk procurement of Priority Flat Rate Envelopes under the alias "Rick Jameson"

bank addressed in Henan, China, on three occasions: May 18, 2020, for $770, March 14, 2021, for $180, and February 3, 2021, for $720. According to open-source searches for the phone number listed on the above monetary payment and transfer system, the phone number is associated with a Chinese company which specializes in industrial mixing and processing equipment used in pharmaceutical, chemical, and food production. In open-source review of the Chinese company, their core products include mixers, blenders, feeders, and automated powder processing lines. I know from my training and experience that many clandestine labs source their pill press components from China, many of which come from entities marketing other adjacent items in open and public forums before private communications take place. The above phone number is associated with several internet domains with these blending and mixing appliances available for sale. Additional searches reveal social media accounts for the same Chinese company, most of the websites display material in English with direct-contact options to inquire on purchasing. One arbitrary image from drymixer.com of a food mixer is listed below:



68. Records obtained from an e-commerce website by law enforcement via legal process revealed the following items of note purchased by S. CHERNYSHOV or V. CHERNYSHOV's account:

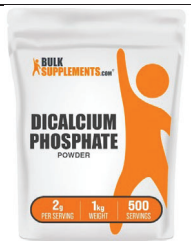
Purchase Date	Item	Listing Photo
5/30/2026	100 Pack Smell Proof Mylar Bags for Food Storage - 5.5 x 7.8 Inch Resealable Packaging Pouch Bags for Small Business Lipgloss Jewelry Matte Black*[41] *Quantity over time, with other brands/listings: 3 [300 bags]	
4/16/2025	3M Ultimate FX Full Facepiece Reusable Respirator, FF-403, NIOSH, ANSI, Six-Strap Harness for a Secure Comfortable Fit, Cool Flow Valve, Passive Speaking Diaphragm, Large[42]	
1/14/2025 5/06/2025 5/22/2025 07/11/2025 08/31/2025 09/13/2025 9/14/2025 09/26/2025 10/09/2025 11/02/2025	biophix Blue Spirulina Powder Organic Blulina 10 oz - Algae Organic Spirulina Powder 283 Servings - Superfood Supplement - Natural Blue Pigment - Espirulina en Polvo Organica Pura Azul*[43] *Quantity over time: 27 units	

[41] The black Mylar Bags noted in S CHERNYSHOV's e-commerce website purchase history are identical to those found in parcels encountered by law enforcement from BarbaraWhite.

[42] I know from my training and experience that respirators are used in clandestine labs to protect the laboratory operator from inhalation of harmful substances that may be aerosolized during the manufacturing process.

[43] I know from my training and experience that clandestine laboratory operations involving the production of counterfeit pills/tablets that aim to mimic real pharmaceuticals will utilize various additives to their mixture in order to add the genuine color of the intended pharmaceutical. In the case of BarbaraWhite, their primary product of Oxycodone M30 pills are blue in color when obtained by the legitimate pharmaceutical manufacturers. The two blue Spirulina products are intended for human ingestion, blue in color, and in powder form, all suitable for counterfeit Oxycodone production.

Purchase Date	Item	Listing Photo
11/05/2025 11/25/2025 12/07/2025 12/13/2025		
5/4/2023 5/9/2023 6/19/2023 9/13/2024 9/18/2024 11/16/2024 1/13/2025	Organic Blue Spirulina Powder, 120 Servings - 100% Pure Superfood Blue-Green Algae, Natural Food Coloring for Smoothies & Protein Drinks - Non GMO, Gluten-Free, Vegan + USDA Certified, No Fishy Smell* [*See footnote 43]* *Quantity over time: 12 units	
03/17/2021 07/27/2021 10/25/2021 01/27/2022 01/28/2022 05/22/2022 10/31/2022	Lone Star Botanicals Organic Blue Spirulina Powder - 100% Pure Blue-Green Algae, No Fishy Smell, Vegan Superfood for Smoothies & Drinks, Non GMO, Gluten-Free, Vegan* – (1 ounce) *Quantity over time: 15 units	
09/17/2020 09/21/2020 09/21/2021	BulkSupplements.com Microcrystalline Cellulose Powder - MCC Powder, Microcrystalline Cellulose Food Grade - Excipient, Binder, & Anti-Caking Agent, 500g (1.1 lbs) (Pack of 1)* *Quantity over time: 15 units	
01/14/2021	BulkSupplements.com Microcrystalline Cellulose Powder - MCC Powder, Microcrystalline Cellulose Food Grade - Excipient, Binder, & Anti-Caking Agent, 1kg (2.2 lbs) (Pack of 1)	

Purchase Date	Item	Listing Photo
11/02/2020 01/09/2021	Microcrystalline Cellulose, Semi-Bulk (Bag and Box), 5 kg (11 Pounds)* *Quantity over time: 2 units	*Image unavailable due to item no longer listed for sale on the e-commerce Website
10/02/2020 10/12/2020 11/02/2020 01/25/2021 03/05/2021 03/10/2021 03/10/2021	BulkSupplements.com Dicalcium Phosphate Powder - Calcium Supplement, DCP Supplement - Unflavored & Gluten Free, 2g per Serving, 1kg (2.2 lbs) (Pack of 1)*[44] *Quantity over time: 11 units	
01/14/2021	Magnesium Stearate, Ultra Pure Powder, 500 Grams[45]	

69. Other purchases noted by law enforcement from this e-commerce website on S CHERNYSHOV's account included: disposable beard nets, replaceable respirator lenses, replaceable respirator filters/cartridges, magnetic stirring plate, handheld car vacuum, ash vacuum, ash vacuum hose kit, car license plate frame, anti-caking agent/filler, Gel food thickener, Dell Inspiron 3000 Laptop, Apple iPhone 14 128 GB, Trail cameras, wireless outdoor home surveillance system, Drone affixed with camera, Wi-Fi power bank, digital scale, rotary

[44] According to LFA Tablet Presses, a known manufacture of pill presses and supplies for them, Dicalcium Phosphate is an ingredient used in the production of tablets and capsules as a flowing agent (https://www.lfatabletpresses.com/dicalcium-phosphate).

[45] According to LFA Tablet Presses, Magnesium Stearate is an effective dry lubricant for capsules and tablets. It increases flowability, which ensures efficiency through the manufacturing process (https://www.lfatabletpresses.com/magnesium-stearate),

trimmer/cutter, rotary cutter replacement blades, magnetic hidden key holder for outside, air purifiers, NARCAN nasal spray,[46] and mixing bowls.

b. Common Mail Characteristics

70. USPIS investigators' review of known POEs by USPIS investigators from Barbarawhite, detained/interdicted associate parcels, and those associates discovered and reviewed through analysis of USPS Business Records indicate common methods employed by BarbaraWhite to remain undetected by law enforcement.

71. The mail items attributed to BarbaraWhite have largely been mailed in USPS Flat Rate Envelopes and affixed with Electronic Postage ("ePostage") labels. These envelopes and labels intend to make the parcel appear like a legitimate business mailing to avoid suspicion. The parcels are most often affixed with a person or business name which is associated with the actual return address affixed, attempting to appear to be a real mailing originating from that sender. The parcels are often known to physically enter the mailstream at or near the return address. BarbaraWhite also employs consistent internal obfuscation or "stealth techniques,"[47] as they are known on the Darknet, to include vacuum sealing the pills in a single layer[48] and placing the vacuum sealed tablets in multiple layers of packaging.

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[46] NARCAN is the brand-name for Naloxone, a drug with a higher affinity to opioid receptors in the brain. When ingested, NARCAN can reverse the effects of opioids, such as respiratory depression. I know from my training and experience NARCAN is necessary to counter the effects of accidental exposure and ingestion of aerosolized opioids in clandestine laboratories.

[47] "Stealth" is known by Drug Trafficking Organizations, especially those operating on the Darkweb, to make their mail item or contents therein harder to detect or appear legitimate

[48] Traffickers employing the mail often vacuum seal their contents in an attempt to shield odor emission from their contraband, making it more difficult for a drug detection K9 or instrument to detect the contents. The single layer also allows the mail item to maintain a slim profile, harder to detect

72. USPS Business Records indicate that approximately 2,470 Priority Mail parcels attributable to BarbaraWhite have entered the U.S. Mailstream since February 2026. USPS records reflect that these mailings have been distributed to and impacted persons in 49 States and the District of Columbia.

Indicia of Darknet/Cryptocurrency Activity

73. In review of marketplace data recovered from a separate law enforcement investigation into Nemesis Market, investigators discovered a series of cryptocurrency wallets used by BarbaraWhite to withdraw proceeds from the sale of narcotics on Nemesis Market. Review of the wallets identified them to be part of a wallet cluster under BTC address ending in -NrjKMf (hereafter referred to as the TARGET WALLET).

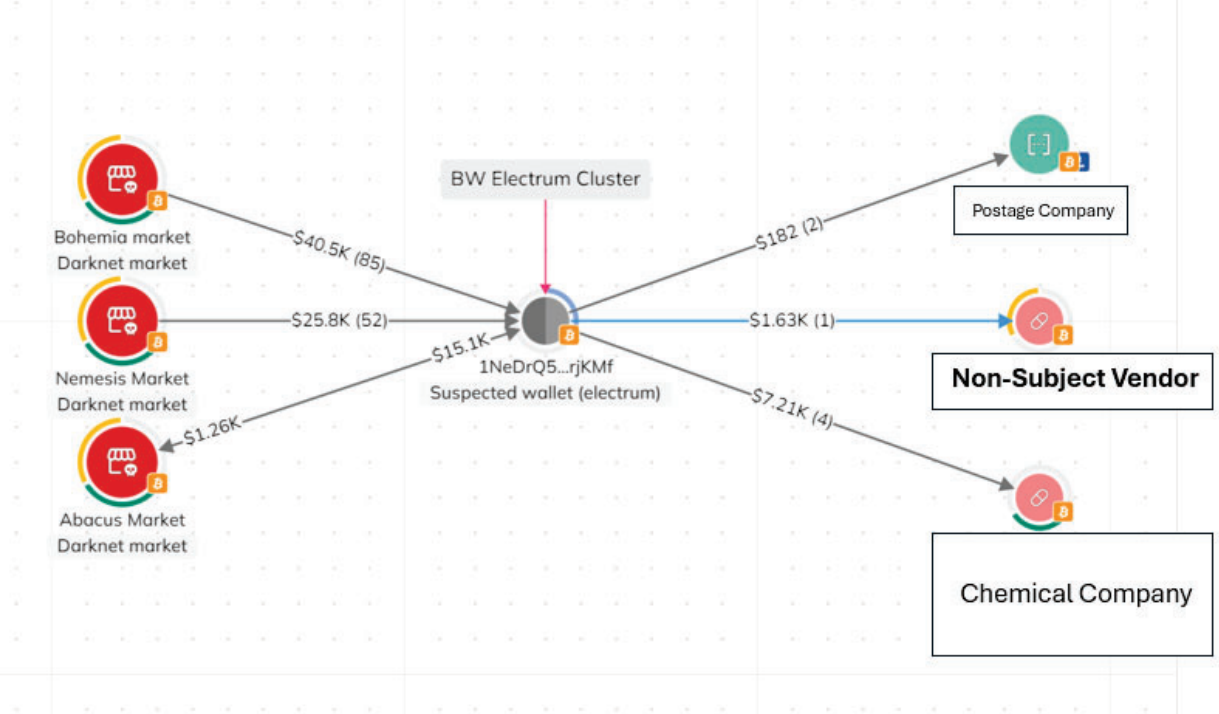
1. Pursuant an ongoing DEA investigation into a separate vendor[49] (herein "Non-Subject Vendor), the DEA discovered an email address, Industrialmpltd@secmail.pro, suspected to be tied to BabaraWhite[50]. A subsequent search warrant by the FBI[51] information obtained by law enforcement led investigators to the discovery and tracing of BTC exchanged between BarbaraWhite and the Non-Subject Vendor via the TARGET WALLET , as well as email communications between the two. Below is a chart that demonstrates the flow of cryptocurrency from transactions between BarbaraWhite to the Non-Subject Vendor.

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49 This supplier is online vendor who utilizes a "clearnet" website, an encrypted communication application, and advertising on the darknet forum "Dread" to sell counterfeit pills, including counterfeit alprazolam pills containing clonazolam and counterfeit Adderall pills containing methamphetamine, both of which are controlled substances.

50 This is suspected to belong to darknet market vendor BarbaraWhite due to similarities to a known BarbaraWhite email [Industrialcandy123@Protonmail.com], control of the TARGET WALLET, and asking for tracking to zip code 32256.

51 Industrialmpltd@SecMail.pro (see below) email data was seized by FBI pursuant to United States District Court, Central District of California Search Warrant 2:26-MJ-4800 (MAR).



23. Review of communications revealed payment was made from industrialmpltd@secmail.pro[52] for 30 grams of Clonazolam[53][54] in June 2020. Further review of orders revealed this same email ordered two prior orders of Clonazolam from the Non-Subject Vendor. Email communications between this email and the Non-Subject Vendor revealed an inquiry to the Non-Subject Vendor for a tracking number to zip code 32256, which investigators know to be a zip code for Jacksonville, FL.

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52 Suspected to belong to darknet market vendor Barbarawhite due to similarities to a known BarbaraWhite email [Industrialcandy123@Protonmail.com], control of the TARGET WALLET, and asking for tracking to zip code 32256.

53 I believe the users of the industrialmpltd@secmail.pro account were intending to spell "clonazolam"; however, it was spelled "clonozalam"in the emails, which is not a real substance to the best of my knowledge.

54 Clonazolam is a "designer benzodiazepine" that is known to be abused and found to be involved in overdose fatalities (https://www.federalregister.gov/documents/2023/07/26/2023-15748/schedules-of-controlled-substances-temporary-placement-of-etizolam-flualprazolam-clonazolam).

24. Analysis of the TARGET WALLET revealed interactions with various Darknet Markets and a vendor for USPS ePostage[55], in addition to the Non-Subject Vendor. Investigators noted frequent IP Address interactions concealed by VPN[56]. Law enforcement noted one such IP Address interaction which was not concealed by VPN and attributable to ISP AT&T from March 2024 and May 2024. Records were obtained by law enforcement of these non-VPN covered interactions from AT&T via legal process. These records indicated an account associated with this IP address was serviced and billed to S CHERNYSHOV.

25. Records obtained by law enforcement via legal process from Block Inc., the proprietor of CashApp, indicate S CHERNYSHOV has a CashApp account under the CashTag "svcvvs" and frequently exchanged currency with BTC from July through September 2024.

26. Further analysis of the TARGET WALLET indicate it has sent the U.S. Dollar equivalent of $230,000 worth of cryptocurrency and received the U.S. Dollar equivalent of $220,000 worth of cryptocurrency. Law enforcement further noted the TARGET WALLET has interactions in common with wallets which transact back to S CHERNYSHOV's CashApp account.

[CONTINUED ON NEXT PAGE]

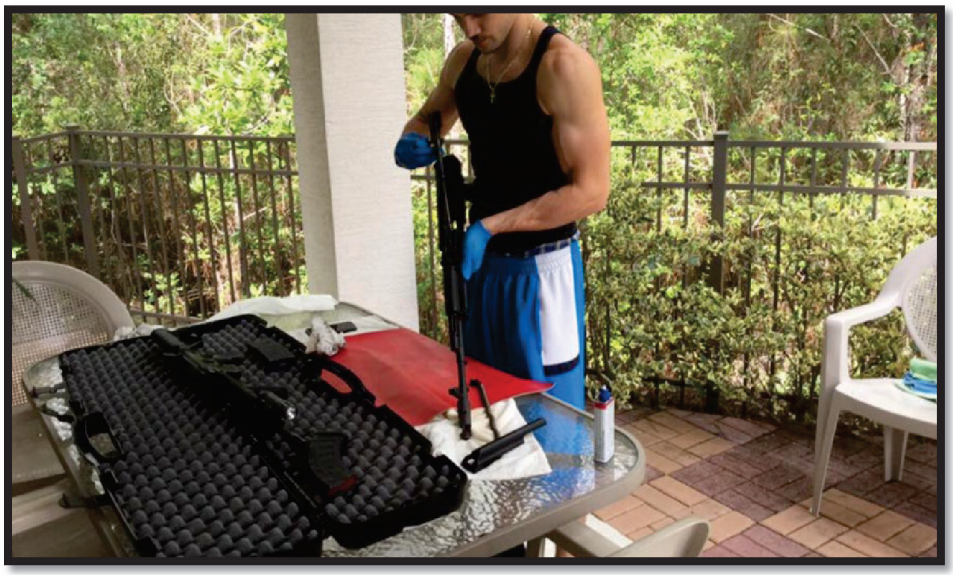
Firearms

55 CryptoPostage.info is a vendor that accepts cryptocurrency as a form of payment to issue USPS ePostage to their customers. This vendor, among others, is a preferred method to obtain postage to mail narcotics sold on the darknet.

56 Records obtained by law enforcement via legal process to an online multinational monetary payment and transfer system platform indicate S CHERNYSHOV has or has had a subscription to a VPN service based in Singapore

27. An open-source review of social media by law enforcement revealed an image posted in 2015 on a social media platform that has V CHERNYSHOV tagged handling a long gun. The image is depicted below:

Image of V CHERNYSHOV Handling Firearms posted to social media



28. During a review of the Apple iCloud[57] account associated with V CHERNYSHOV, law enforcement observed a photograph of a handgun posed in front of a "VVS" logo banner[58] (see images below). Furthermore, law enforcement observed a photograph of a rifle sight on a background similar to that of the handgun photo[59] (see images below) as well as the picture of the stock of a Daniel Defense M4 rifle[60]. Furthermore, in a review of the Google[61]

[57] Apple iCloud data was seized pursuant to United States District Court, Eastern District of Virginia Search Warrant 1:-26-SW-480 (WEF).

[58] The image shows last modified on March 28, 2024.

[59] The image shows last modified on May 22, 2025.

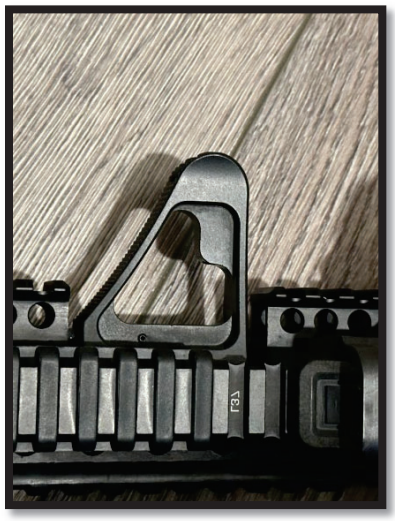
[60] The image shows last modified on May 22, 2025.

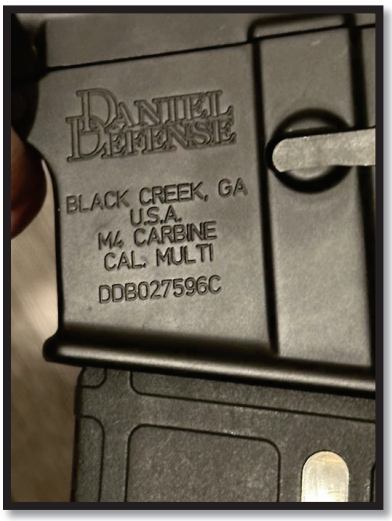
[61] Google account data was seized pursuant to United States District Court, Eastern District of Virginia Search Warrant 1:26-SW-526 (LRV).

account associated with V CHERNYSHOV[62], law enforcement observed "Google searches" for numerous terms involved with firearms, to include: "Armalite M15[63]", "Springfield Armory 1911[64]", "price of Glock 19 gen5[65]", and "Eotech 512[66]."

Images from V CHERNYSHOV's iCloud







Overdose Data on Suspected BarbaraWhite Customers

29. Law enforcement investigation into BarbaraWhite was initiated due to fatal overdoses which coincided with parcels received through the U.S. Mail which were suspected or confirmed to contain narcotics and later attributed to BarbaraWhite in several jurisdictions including Arlington, Virginia, Ft. Worth, Texas, and Burlington, Wisconsin. Through analysis of

62 The Google searches took place between August 20, 2024 to May 23, 2025.
63 Armalite M15 is a light tactical carbine rifle.
64 Springfield Armory 1911 is semi-automatic pistol.

65 This references the Glock 19 Gen5 is a compact handgun.

66 Eotech 512 is a holographic weapon sight that mounts to a rifle.

associate mailings, investigators have discovered additional overdoses through records from local emergency services.[67] The chart below shows these findings:

Victim Type	OD Type	Location	Date Parcel Shipped	Date Parcel Delivered	Date of OD	Notes:
Adult	Non-fatal	Burlington, WI	7/18/2023	7/24/2023	8/10/2023	Wife and first responders administer CPR. Police administer Narcan. Wife states he orders pain pills online from Florida, she is concerned they contain fentanyl and destroyed some but concerned he is ordering more. USPIS/Burlington PD interview the victim and he admits the pills are from Barbarawhite.
Adult	Fatal	Arlington, VA	8/22/2023	8/24/2023	8/28/2023	Blue pills found on scene, intermediary who ordered the drugs admitted ordering from Barbarawhite.
Adult	Fatal	Fort Worth, TX	1/10/2025	1/14/2025	1/15/2025	Blue pill residue found on scene, witness observed victim ordering from Barbarawhite. Parcel found on scene had characteristics and attributes consistent with Barbarawhite mailings.
Juvenile	Non-Fatal	Mount Pleasant, SC	10/15/2025	10/17/2025	10/17/2025	PD report indicates 3 tablets visually similar to oxycontin were taken by the victim. Parcel delivered on day of OD and history of subsequent parcels had characteristics and attributes

[67] As noted *supra*, the identification of fatal drug overdoses of BarbaraWhite customers is likely under representative, as many toxicology screenings do not detect nitazenes.

Victim Type	OD Type	Location	Date Parcel Shipped	Date Parcel Delivered	Date of OD	Notes:
						consistent with Barbarawhite mailings.
Adult	Fatal	Frisco, TX	11/12/2025	11/14/2025	11/15/2025	Blue pills found on scene. Digital records of monero payments to unknown source. Parcel found on scene had characteristics and attributes consistent with Barbarawhite mailings.
Adult	Non-Fatal	Burke, VA	1/2/2026	1/5/2026	1/5/2026	Victim received Narcan from victim/landlord, refused EMS. Victim admitted consumption of oxycodone to emergency responders. Victim's boyfriend made statements to USPIS acknowledging pills from the mail and Darkweb- had subsequent knowledge of nitazenes and origin vendor as "thuggaking54," further investigation revealed "thuggaking54 is highly likely a drop shipper who drop shipped off of Barbarawhite given parcel characteristics and attributes consistent with Barbarawhite mailings.
Adult	Fatal	Waycross, GA (via suspected local dealer that is Barbara White customer)	1/18/2026	1/21/2026	1/26/2026	Consistent customer of Barbarawhite at [XXX] Gilmore Street, Waycross, GA (about 27 min walking from Decedent's home), mom states in local news interview that she walked 44 minutes to obtain the drugs from someone's home nearby the night prior and knows her daughter to take pills. She suspects fentanyl.

Victim Type	OD Type	Location	Date Parcel Shipped	Date Parcel Delivered	Date of OD	Notes:
						Parcel history to suspected supplier has history of parcels with characteristics and attributes consistent with Barbarawhite mailings.
Adult	Non-Fatal	Bells, TX	1/20/2026	2/3/2026	2/3/2026	Blue pills found on scene. Parcel found on scene had characteristics and attributes consistent with Barbarawhite mailings.
Adult	Fatal	San Franciso, CA	1/27/2026	1/29/2026	2/1-7/2026	History of suspicious parcels to decedent address, last parcel had characteristics and attributes consistent with Barbarawhite mailings. Found deceased at home shortly after last BarbaraWhite-associate mailing.
Adult	Non-Fatal	Washington County, Oregon	03/04/2026	03/09/2026	03/09/2026	Police and EMS administered life-saving measures and Narcan. Victim stated she took two pills from a parcel that was delivered that day from BarbaraWhite. Blue pills were recovered on scene, and victim provided proof of the dark web purchase. Victim advised they were supposed to be fentanyl free.
Adult	Non-Fatal	Haymarket, VA	3/11/2026	3/13/2026	3/15/2026	Emergency responders conducted CPR at scene. Family mentions history of abuse on BWC. Son states it was from pill consumption. Parcel delivered two days before and a subsequent detained parcel (which revealed pills identical to Barbarawhite's) had

Victim Type	OD Type	Location	Date Parcel Shipped	Date Parcel Delivered	Date of OD	Notes:
						characteristics and attributes consistent with Barbarawhite mailings.
Adult	Non-Fatal	Haywood, VA	5/1/2026	5/4/2026	5/5/2026	Mother tells responding officers her son buys drugs off the internet and tests them for fentanyl, suspects substance abuse disorder. Parcel delivered the day prior had characteristics and attributes consistent with Barbarawhite mailings.
Adult	Non-Fatal	Newport Beach, CA	6/3/2026	6/5/2026	6/6/2026	Emergency responders administer Narcan on scene, takes several doses. Victim admitted to emergency responders he ordered M30 pills from the Darkweb that he believed to contain ODMST. Parcel delivered had characteristics and attributes consistent with Barbarawhite mailings.
Adult	Non-Fatal	Matthews, NC	6/22/2026	6/25/2026	7/5/2026	Father called 911 to report his son was experiencing and unintentional OD. History of parcels to include one just ten days before the OD had characteristics and attributes consistent with Barbarawhite mailings.

INDICIA OF CONTINUED ACTIVITY

30. Barbarawhite showed having logged onto DrugHub and Torzon as recently as August 18, 2026.

CONCLUSION

31. Based on the facts set forth above, I respectfully submit that there is probable cause to believe that between May 5, 2021 and the present, within the Eastern District of Virginia and elsewhere, Vladislav Vitalievich CHERNYSHOV and Stanislav Vitalievich CHERYNSHOV did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with others, known and unknown, to unlawfully, knowingly, and intentionally distribute controlled substances, including Nitazenes, to include: Protonitazene, Metonitazene, N-Pyrrolidino Etonitazene, and N-Pyrrolidino Isotonitazene, all Schedule I controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

Respectfully submitted,

Mickey Bigg

Mickey Bigg
Task Force Officer
Federal Bureau of Investigation

Subscribed and sworn to in accordance with Fed. R. Crim. P. 4.1
by telephone on August 25, 2026.

Lindsey R Vaala

Digitally signed by Lindsey R Vaala
Date: 2026.08.25 11:33:32 -04'00'

The Honorable Lindsey R. Vaala
United States Magistrate Judge