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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 DAVID RYAN BURCHARD,
14 Defendants.
15
16

CASE NO.

AFFIDAVIT OF MATTHEW LARSEN

Violations:

21 U.S.C. § 841(a)(1) & (b)(1)(C) (Distribution of
Marijuana and Cocaine, Controlled Substances);
21 U.S.C. § 846 and 841(a)(1) & (b)(1)(C)
(Conspiracy to Distribute Marijuana and Cocaine,
Controlled Substances).

17 I, Mathew Larsen, being firstly duly sworn, hereby depose and state as follows:

18 **I. INTRODUCTION AND AGENT BACKGROUND**

19 1. I am a Special Agent with Homeland Security Investigations (HSI) and have been so
20 employed since November 2008. My duties include the investigation of criminal violations involving
21 narcotics trafficking and money laundering. Moreover, as an HSI Special Agent, I am generally
22 authorized to investigate violations of the laws of the United States and to execute search and seizure
23 warrants issued under the authority of the United States.
24

25 2. As a requirement for employment as an HSI Special Agent, I successfully completed the
26 Criminal Investigator Training Program (CITP) located at the Federal Law Enforcement Training Center
27 (FLETC) in Glynco, Georgia. At the conclusion of CITP, I completed an additional Immigration and
28

1 Customs Enforcement Special Agent Training Academy. As part of the training at FLETC, I received
2 extensive instruction in the areas of immigration law, customs law, illegal narcotics, firearms, rules of
3 evidence, and interview techniques.

4 3. I am familiar with the formal methods of illegal narcotics and money laundering
5 investigations, including electronic surveillance, visual surveillance, general questioning of witnesses,
6 search warrants, confidential informants, the use of undercover agents, and analysis of financial records.
7 I have participated in investigations of organizations involved in the manufacture, distribution, and
8 possession with intent to distribute controlled substances. I am also familiar with the use of digital
9 currency to launder money and have participated in trainings on this subject.

10 4. The information in this Affidavit is based on my personal knowledge, information
11 provided to me by others, including other law enforcement officials and civilian witnesses, as well as my
12 review of documents associated with the case. I am fully aware of the facts and circumstances
13 concerning this investigation and have participated in significant aspects of this investigation.

14 5. The information contained in this Affidavit is submitted for the sole purpose of
15 demonstrating probable cause to obtain a criminal complaint charging David Ryan BURCHARD with
16 violations of Title 21, United States Code, Sections 841(a)(1) and 846 (Distribution and Possession with
17 Intent to Distribute Marijuana and Cocaine, and Conspiracy). Because this Affidavit is being submitted
18 for the limited purpose of demonstrating probable cause, it does not contain all of the information
19 known to me and/or other law enforcement officers involved in this case.

20 **II. BACKGROUND ON DIGITAL CURRENCY**

21 6. Digital currency (also known as crypto-currency) is generally defined as an electronic-
22 sourced unit of value that can be used as a substitute for fiat currency (i.e. currency created and
23 regulated by a government). Digital currency exists entirely on the Internet and is not stored in any
24 physical form. Digital currency is not issued by any government, bank, or company and is instead
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1 generated and controlled through computer software operating on a decentralized peer-to-peer network.
2 Digital currency is not illegal in the United States and may be used for legitimate financial transactions.
3 However, digital currency is often used for conducting illegal transactions, such as the sale of controlled
4 substances.

5
6 7. Bitcoin is a type of digital currency. Bitcoin payments are recorded in a public ledger
7 that is maintained by peer-to-peer verification, and is thus not maintained by a single administrator or
8 entity. Individuals can acquire bitcoins either by “mining” or by purchasing bitcoins from other
9 individuals. An individual can “mine” for bitcoins by allowing his/her computing power to verify and
10 record the Bitcoin payments into a public ledger. Individuals are rewarded for this by being given newly
11 created bitcoins.

12
13 8. An individual can send and receive bitcoins through peer-to-peer digital transactions or
14 by using a third-party broker. Such transactions can be done on any type of computer, including laptop
15 computers and smart phones.

16
17 9. Bitcoins are stored on digital “wallets.” A digital wallet essentially stores the access code
18 that allows an individual to conduct bitcoin transactions on the public ledger. To access bitcoins on the
19 public ledger, an individual must use a public address (or “public key”) and a private address (or
20 “private key”). The public address can be analogized to an account number while the private key is like
21 the password to access that account.

22
23 10. Even though the public addresses of those engaging in bitcoin transactions are recorded
24 on the public ledger, the true identities of the individuals or entities behind the public addresses are not
25 recorded. If, however, a real individual or entity is linked to a public address, it would be possible to
26 determine what transactions were conducted by that individual or entity. Bitcoin transactions are,
27 therefore, described as “pseudonymous,” meaning they are partially anonymous.

28
11. Through the dark-web or dark-net, i.e. websites accessible only through encrypted means,

1 individuals have established online marketplaces, such as the Silk Road, for narcotics and other illegal
2 items.¹ These markets often only accept payment through digital currencies, such as bitcoin.

3 Accordingly, a large amount of bitcoin sales or purchases by an individual is often an indicator that the
4 individual is involved in narcotics trafficking or the distribution of other illegal items. Individuals
5 intending to purchase illegal items on Silk Road-like websites need to purchase or barter for bitcoins.
6 Further, individuals who have received bitcoin as proceeds of illegal sales on Silk Road-like websites
7 need to sell their bitcoin to convert them to fiat (government-backed) currency. Such purchases and
8 sales are often facilitated by peer-to-peer bitcoin exchangers who advertise their services on websites
9 designed to facilitate such transactions.
10

11 12. Dark websites, such as Silk Road, operated on “The Onion Router” or “TOR” network.
12 The TOR network (“TOR”) is a special network of computers on the Internet, distributed around the
13 world, that is designed to conceal the true Internet Protocol (“IP”) addresses of the computers accessing
14 the network, and, thereby, the locations and identities of the network’s users. TOR likewise enables
15 websites to operate on the network in a way that conceals the true IP addresses of the computer servers
16 hosting the websites, which are referred to as “hidden services” on the TOR network. Such “hidden
17 services” operating on TOR have complex web addresses, generated by a computer algorithm, ending in
18 “.onion” and can only be accessed through specific web browser software designed to access the TOR
19 network.
20
21

22 ///

23 ///

24 ///

25
26 ¹ The Silk Road was a dark website operated as a TOR hidden service. The Silk Road allowed
27 its users to browse anonymously to purchase a variety of illegal goods, including controlled substances.
28 Bitcoin was the form of payment accepted by the site. A further description of Silk Road is included
below.

1 **III. FACTS ESTABLISHING PROBABLE CAUSE**

2 **A. *Homeland Security Identifies David BURCHARD as a Marijuana Distributor***

3 13. I am part of a digital currency task force focused on identifying the use of digital
4 currency to launder the proceeds of criminal activity. As part of this task force, I have been involved in
5 several investigations into unlicensed digital currency exchangers and narcotics distributors on the dark-
6 web who use digital currency to receive payment for the sale of narcotics. These investigations have
7 brought my attention to numerous individuals who have been cycling through large amounts of Bitcoin.
8 One of those individuals is David BURCHARD.

9 14. Specifically, in or around March, 2015, I began investigating David BURCHARD based,
10 in part, on his sale of millions of dollars of Bitcoins to an unlicensed digital currency exchanger. I was,
11 and continue to be, unable to identify a legitimate source of BURCHARD's large amount of Bitcoins.
12 Using surveillance and public records, I learned that BURCHARD's primary residence was located at
13 **** Gabriel Drive, Merced, California 95340 (the GABRIEL RESIDENCE). I also discovered that
14 BURCHARD drove a white Chevrolet Tahoe bearing California license plate 6BOK924 (the CHEVY
15 TAHOE).

16 15. On March 12, 2015, at approximately 9:00 am, HSI Special Agent's (SA's) initiated
17 surveillance at the GABRIEL RESIDENCE and noted the presence of the CHEVY TAHOE parked near
18 the residence in close proximity to the intersection of Via Moraga and Gabriel Drive.

19 16. On March 12, 2015, at approximately 11:26 am, I telephonically swore out a search
20 warrant with U.S. Magistrate Judge Barbara A. McAuliffe to install a Global Positioning System (GPS)
21 tracker onto the CHEVY TAHOE and subsequently installed the tracker at approximately 12:00 pm. At
22 approximately 12:15 pm, SA's departed the area.

23 17. On March 18, 2015, other case agents and I conducted surveillance on BURCHARD. I
24 observed BURCHARD in the CHEVY TAHOE near an address at **** Duke Ct, Merced, California
25 95340 (the DUKE CT ADDRESS). Public records associate BURCHARD with this residence as
26 recently as July 2014. GPS records from a tracking device installed on the CHEVY TAHOE also
27 showed BURCHARD at the GABRIEL RESIDENCE. At approximately 3:28 pm, the CHEVY
28

1 TAHOE drove from Merced, California to the United States Post Office (USPO) located at 755 East
2 Nees Ave, Clovis, California 93720, arriving at approximately 4:42 pm.

3 18. Subsequently, United States Postal Inspector Jessica Burger obtained surveillance video,
4 which shows a white male resembling BURCHARD with three medium sized parcels in his arms inside
5 the USPO at approximately 4:48 pm. According to GPS data, at approximately 5:05 pm, the CHEVY
6 TAHOE arrived at the USPO located at 655 Minnewawa Ave, Clovis, California 93612. Then,
7 according to GPS data, at approximately 6:24 pm, the CHEVY TAHOE returned to the area of Merced,
8 California.

9 19. On March 20, 2015, I provided the Inspector Burger with a booking photo of
10 BURCHARD obtained from a recent Driving While Intoxicated arrest on March 9, 2015. Based on this
11 photo, Inspector Burger recognized BURCHARD from prior video footage of him mailing three
12 packages from the USPO located at 655 Minnewawa Ave, Clovis, California 93612, on March 18, 2015.

13 20. In addition, Inspector Burger recognized BURCHARD from a previous investigation she
14 was involved in. Specifically, in June 2014, the Postal Service could not deliver a parcel mailed to “Car
15 Audio Refurbishment, Fernando Garcia, Pharr, TX 78577” because the address was vacant; the parcel
16 was then sent back to the return address at 14681 Huntington Road, Madera, California 93636. Postal
17 Inspectors searched the package and found marijuana inside it. Inspector Burger determined that the
18 parcel was mailed from the USPO located at 755 E. Nees Ave, Fresno, California 93720, and retrieved
19 video from that USPO that shows an individual resembling BURCHARD mailing the parcel.

20 21. Inspector Burger had investigated the previously unidentified sender (now identified as
21 BURCHARD) and noted the payment card used to mail the package in June 2014 was also used to send
22 approximately 55 packages from Automated Processing Centers at USPOs located in or around Fresno
23 and Modesto, California.

24 22. On March 20, 2015, as described below, BURCHARD mailed a parcel containing
25 marijuana from a USPO located in Clovis, California.

- 26 • On March 20, 2015, at approximately 11:32 pm, GPS data indicated that the CHEVY
27 TAHOE had arrived at the USPO located at 655 Minnewawa Ave, Clovis, California
28 93612. At approximately 11:44 pm, the CHEVY TAHOE arrived at the USPO located at

1 755 East Nees Ave, Clovis, California 93720. The CHEVY TAHOE then departed the
2 area.

- 3 • The following day, on March 21, 2015, Inspector Burger informed me that she reviewed
4 video and observed BURCHARD mail a parcel on March 20, 2015 at the USPO located
5 at 655 Minnewawa Ave, Clovis, California 93612. Inspector Burger seized
6 BURCHARD's parcel, which was addressed to "James Good, 3556 Briarthorne Drive,
7 Charlotte, North Carolina 28269." On March 27, 2015, Inspector Burger obtained a
8 federal search warrant (1:15-SW-00075-SKO) to search this parcel.
- 9 • On March 31, 2015, Postal Inspector Jessica Burger arrived at the HSI Fresno office with
10 the parcel that was mailed by BURCHARD on March 20, 2015 from the USPO located at
11 655 Minnewawa Ave, Clovis, California 93612. The return address for the parcel was
12 "Central California Auto Refurb., 4949 N. Wishon Ct., Fresno, California 93704." I
13 conducted a public records check on this business with negative results. In addition, the
14 address appeared to be a residence that was listed for sale.
- 15 • At approximately 9:30 am, Inspector Burger and I executed the warrant on the parcel and
16 discovered six vacuum sealed packages that contained a green leafy substance. I
17 conducted a field test on the substance which tested positive for marijuana. The
18 combined weight of the six packages was approximately 48.5 ounces. Subsequently, I
19 sent the marijuana and the packaging to the Drug Enforcement Administration laboratory
20 located in Pleasanton, California for further analysis, which is pending.

21 23. On March 25, 2015, as described below, BURCHARD mailed a parcel containing
22 marijuana from a USPO located in Clovis, California.

- 23 • On March 25, 2015, GPS data indicated that the CHEVY TAHOE was moving south
24 from Merced, California, and heading towards Clovis, California. Subsequently, HSI
25 Fresno case agents established surveillance positions near USPO locations in Clovis,
26 California.
- 27 • At approximately 2:25 pm, the case agents observed the CHEVY TAHOE arrive at the
28 USPO located at 755 East Nees Ave, Clovis, California 93720. Case agents obtained

1 photos of BURCHARD exiting the CHEVY TAHOE and carrying two packages, one
2 white and one brown, into the USPO. One of the case agents went into the USPO and
3 observed BURCHARD place the packages into a mail bin. The case agent then
4 prevented other customers from placing packages into the bin until BURCHARD's
5 packages were retrieved. Inspector Burger arrived and took control of the two packages
6 BURCHARD mailed.

- 7 • The case agent who observed BURCHARD place the packages into the mail bin
8 recognized the packages retrieved by Inspector Burger and me. The case agents observed
9 no other packages in the mail bin with the same physical characteristics of the
10 BURCHARD packages. In addition, both packages were addressed to the same person
11 and address, which was "Jordan Hall, 4427 Brandie Glen Rd, Charlotte, North Carolina
12 28269," with a return address of "Central California Auto Refurb, 4949 N. Wishon Ct,
13 Fresno, California 93704." Inspector Burger subsequently forwarded the two parcels to
14 Postal Inspectors based in Charlotte, North Carolina.
- 15 • Upon review of the GPS data, I discovered that on March 25, 2015, at approximately
16 2:12 am, the CHEVY TAHOE was located at the DUKE CT ADDRESS, before it arrived
17 at the GABRIEL RESIDENCE, at approximately 3:34 am. At approximately 1:24 pm,
18 GPS data indicated the CHEVY TAHOE departed the GABRIEL RESIDENCE and
19 drove directly to the USPO located at 755 East Nees Ave, Clovis, California 93720,
20 arriving at approximately 2:25 pm. At this point HSI case agents observed BURCHARD
21 mail the parcels as detailed above.
- 22 • On May 1, 2015, I received reports and images from a Charlotte, North Carolina-based
23 Postal Inspector pertaining to the two parcels BURCHARD mailed from Clovis,
24 California on March 25, 2015. The reports indicate that on March 30, 2015, Postal
25 Inspectors attempted to verify on law enforcement databases information associated with
26 the parcels mailed by BURCHARD on March 25, 2015 but could not identify any known
27 persons associated with the listed sender and addressee. On March 30, 2015, Drug K-9
28 Handler Officer V.W. Woodlief, from the Charlotte Mecklenburg Police Department,

1 conducted a narcotics detection examination with his K-9 "Indy" on the parcels. Both
2 parcels were placed separately into a lineup along with four similar control parcels.
3 Inspector Crooks observed as Indy walked among the parcels and noted that Indy alerted
4 to the suspect packages by sniffing the seams and responding passively by sitting next to
5 the parcels, which is his signal to indicate the scent of a controlled substance.

- 6 • On April 3, 2015, the Postal Inspector obtained federal search warrants for the two
7 parcels and found that one of the parcels contained seven vacuum sealed packages
8 containing approximately 4.16 pounds of marijuana. The other parcel contained two
9 vacuum sealed bags that contained approximately 1.18 pounds of marijuana. On May 1,
10 2015, I reviewed pictures of the contents of parcels and noted that the marijuana was
11 sealed with a gray outer packaging and a clear vacuum sealed inner packaging. This
12 packaging appeared similar in color and consistency to the packaging used in the parcel
13 BURCHARD mailed from Clovis, California, on March 20, 2015, and examined by HSI
14 case agents. On May 5, 2015, I spoke with the Postal Inspector, who confirmed that he
15 obtained positive field tests for the parcels and that he subsequently had the marijuana
16 destroyed on April 17, 2015.

17 ***B. David BURCHARD Sells Marijuana and Cocaine on the Silk Road***

18 24. On June 3, 2015, I learned that publicly available information indicated David
19 BURCHARD, ***** Duke Ct, Merced, California 95340, had registered or attempted to register and
20 trademark the phrase "caliconnect." After obtaining this information, HSI Fresno investigators began to
21 search Reddit and other publicly available websites for the username "caliconnect" and discovered
22 comments and reviews from individuals claiming to have ordered marijuana from a dark-web vendor
23 going by the online username "caliconnect." "Caliconnect" appeared to operate on "dark-web" websites
24 that specialize in selling contraband, utilizing encryption and Internet Protocol ("IP") "anonymizers" to
25 protect buyer and seller identities, as described below.

26 25. On the same day, June 3, 2015, I reviewed a document entitled "Silk Road NTC Vendor
27 List," which was provided to me in March 2015 by HSI Headquarters. As background, Silk Road was a
28 dark-web market, best known as a platform for selling illegal drugs and other illegal items. The illegal

1 nature of the commerce hosted on the Silk Road was readily apparent to anyone visiting the site. The
2 vast majority of the goods for sale consisted of illegal drugs of nearly every variety, openly advertised
3 on the site as such and prominently visible on the home page. The only form of payment on Silk Road
4 was Bitcoin.

5 26. In October 2013, federal law enforcement shut down the website and arrested Ross
6 William Ulbricht under charges of being the site's pseudonymous founder "Dread Pirate Roberts." In
7 February 2015, Ulbricht was convicted on conspiracy, narcotics, and money laundering charges in U.S.
8 Federal Court in Manhattan relating to the Silk Road and was sentenced on May 29, 2015 to life in
9 prison. As part of the investigation, the FBI was able to seize information about vendors on the Silk
10 Road, which has since been made available to law enforcement.

11 27. The Silk Road NTC Vendor List, referenced above, contained a list of vendors on Silk
12 Road with over \$100,000.00 in sales, compiled from information on computing servers that were seized
13 by law enforcement during the investigation into Silk Road. Included in this document was the vendor
14 name "caliconnect." "Caliconnect" was described as a marijuana trafficker with a sales volume at
15 approximately \$1,250,248.65. "Caliconnect" is listed on the NTC Vendor List as the one of the largest
16 vendors on the Silk Road. The FBI estimates that "caliconnect" was the eighteenth largest vendor
17 worldwide out of the approximately 4,000 vendors who sold goods on the Silk Road. As such, this
18 information indicated that BURCHARD was likely a large-scale vendor on the Silk Road utilizing the
19 vendor name "Caliconnect." I requested additional data from the seized Silk Road servers pertaining to
20 "Caliconnect." I received this information on June 11, 2015 and began to review it (as described
21 below).

22 28. On July 20, 2015, I sent United States Postal Inspector Trevor Covert a list of postal
23 tracking numbers obtained from the Silk Road "caliconnect" data. The tracking numbers were found in
24 private messages between "caliconnect" and his customers. These tracking numbers were assigned to
25 parcels containing marijuana that were sent by "caliconnect" to customers.

26 29. On July 21, 2015, I reviewed the findings of Inspector Covert, which are summarized
27 below:

28 a. 9505 5213 8331 3087 0000 96 – mailed from Merced, CA post office zip code

- 1 95340 going to Ithaca, NY zip code 14853--April 1, 2013;
- 2 b. 9505 5213 8331 3130 0005 23 – mailed from Merced, CA post office zip code
- 3 95340 going to Ridgfield, NJ zip code 07657--May 14, 2013;
- 4 c. 9505 5109 8173 3207 5153 69 – mailed from Winton, CA post office zip code
- 5 95388 going to Marion, OH zip code 43302--July 31, 2013;
- 6 d. 9505 5106 2632 3105 5732 93 – mailed from Chowchilla, CA post office zip
- 7 code 93610 going to Boston, MA zip code 02116--April 15, 2013;
- 8 e. 9505 5105 4336 3113 4373 38 – mailed from Atwater, CA post office zip code
- 9 95301 going to Hays, KS zip code 67601--April 25, 2013;
- 10 f. 9505 5108 8804 3137 4795 51 - mailed from Fresno, CA post office zip code
- 11 93720 going to Wilmington, DE zip code 19804--May 23, 2013;
- 12 g. 9505 5106 7980 3210 5773 90 - mailed from Merced, CA post office zip code
- 13 95340 going to Marion, OH zip code 43302--July 30, 2013;
- 14 h. 9505 5109 8173 3210 5343 64 - mailed from Winton, CA post office zip code
- 15 95388 going to Marion, OH zip code 43302--July 30, 2013;
- 16 i. 9505 5109 8173 3210 5341 35 - mailed from Winton, CA post office zip code
- 17 95388 going to Pompano Beach, FL zip code 33066--August 04, 2013;
- 18 j. 9505 5000 2928 3218 0002 12 - mailed from Clovis, CA post office zip code
- 19 93612 going to Centre Hall, PA zip code 16828--August 08, 2013;
- 20 k. 9505 5213 8332 3218 0002 77 - mailed from Merced, CA post office zip code
- 21 95340 going to Baltimore, MD zip code 21218--August 08, 2013;
- 22 l. 9505 5000 1250 3219 0001 97 - mailed from Fresno, CA post office zip code
- 23 93720 going to Bronx, NY zip code 10457--August 09, 2013;
- 24 m. 9505 5000 2650 3249 0001 15 - mailed from Fresno, CA post office zip code
- 25 93720 going to Danville, PA zip code 17821--September 06, 2013;
- 26 n. 9505 5000 2650 3256 0002 69 - mailed from Fresno, CA post office zip code
- 27 93720 going to Oxford, OH zip code 45056--September 17, 2013;
- 28 o. 9505 5000 2928 3257 0000 51 - mailed from Clovis, CA post office zip code

1 93612 going to Binghamton, NY zip code 13905--September 21, 2013; and

2 p. 9505 5000 2928 3256 0002 05 - mailed from Clovis, CA post office zip code

3 93612 going to Roxbury Crossing, MA zip code 02120--September 21, 2013.

4 30. I observe that all the post offices utilized to send the parcels are located within the
5 Central Valley of California, near the home of BURCHARD, who resides in Merced, California.

6 31. In October, 2015, I reviewed Silk Road private messages between "caliconnect" and a
7 customer named "fishing01." The following is a summary of contact between "caliconnect" and
8 "fishing01":

9 a. On August 7, 2013, "fishing01" sent "caliconnect" a private message that stated
10 the following:

11 i. "Dear Cali, I am currently looking for a new vendor. I hope that you and I
12 can do some business together. It's seems you have exactly what I'm looking
13 for."

14 ii. "I have been using this "money pak" with great success for the last couple
15 of months. Its faster, easier, and no so up and down. Do you know about these
16 CC's? And if so, would this be something that I could pay with? I get these CC
17 thru Walmart. I pay cash, and it cant be tracked...I just send you a 16 digit code
18 that you can add to you CC balance. It works for me bc I'm on the road a lot and
19 can buy one within minutes."

20 iii. "I will be looking at buying 3-5 lbs monthly depending on the month..and
21 the if the products move like I think it will. If so, I'm in!!! Thank you for your
22 time, pp."

23 b. On August 8, 2013, "caliconnect" responded to "fishing01":

24 i. "yea yea I know about green dot packs...yea that works...lets do this
25 first...buy a hp from me...if all goes well on both ends we can talk...safeguards
26 both us to start out small right"

27 c. On August 8, 2013, "fishing01" responded to "caliconnect"

28 i. "thank you very much..this is a big help! I'll go buy a money pak today

1 for hp. I'll send you the numbers so you add to your card. I do appreciate the
2 help with this payment. I'll be in touch. ps. This new warning on this site
3 (tormail) does this affect us emailing each other? Thanks again.”

4 d. On August 14, 2013, “fishing01” sent “caliconnect” the following private
5 message:

6 i. “Sorry my bad, I bought a money pak for \$865 today. This is before the I
7 got the last email. Please take out a half oz if you need to complete this
8 transaction. Thank you.”

9 ii. 29532942490876

10 iii. Steven John, 15 partridge lane, gray me 04039

11 iv. Please confirm..i do not want to sign for anything if that is possible?

12 Please let me know when this will be going out and if there is a tracking number
13 with this. Thanks again.”

14 e. On August 17, 2015, “caliconnect” sent “fishing01” the following private
15 message:

16 i. “all good the money pack went through...I am shipping out your stuff
17 Monday and will use priority express for the delay..you will have it on wed”

18 f. On August 22, 2015, “fishing01” sent “caliconnect” the following private
19 message:

20 g. “I got it today around 3 pm. Thank you. Looks good. I'll do a full one this time.
21 I'll have the numbers for you by the end of the day. If you can get it today that would
22 help me out, if not, tomorrow works too. Thank you.”

23 h. On August 23, 2013, “fishing01” sent “caliconnect” the following private
24 message:

25 i. “I'll take a whole one this time..2 money packs with 925 on each one.

26 ii. 60904459068324

27 iii. 05272755073653

28 iv. Shirley Beal, 15 partridge lane, gray me 04039”

1 i. On August 28, 2015, "fishing01" sent "caliconnect" the following private
2 message:

3 i. "Sounds good. I'll be looking at doing a bigger package in the next 2
4 weeks..need to get some funds for it all. I'm sending over \$1700 as agreed upon.

5 ii. 79925605273324

6 iii. 59382846730844

7 iv. Stephen John, 38 running brook rd, windham, me 04062"

8 32. On October 18, 2015, I submitted a subpoena to Green Dot Corporation for information
9 related to the previously referenced Money Pak codes involving "fishing01" and "caliconnect." On
10 October 30, 2015, I received an email response from Green Dot containing the following information:

11 a. For 11 of the 12 Money Pak codes contained within the subpoena, Green Dot
12 indicated they did not have records to provide. However, for Money Pak code
13 29532942490876, Green Dot indicated that on August 17, 2013, \$865.00 was transferred
14 from this code to a Green Dot Network partner AccountNow Prepaid Visa card, number
15 ending in 1881, in the name of DAVID BURCHARD, with a zip code of 95348. This
16 particular Money Pak was obtained from the private message dated August 14, 2013 (as
17 mentioned above).

18 b. In addition, according to Green Dot, Money Pak codes 29532942490876 and
19 60904459068324 were also redeemed to BURCHARD's AccountNow Prepaid Visa card.
20 These Money Pak codes were also mentioned in private messages between "fishing01"
21 and "caliconnect" on August 23, 2013, and August 14, 2013, respectively.

22 c. Green Dot also indicated that BURCHARD's AccountNow prepaid Visa card was
23 blocked because it was receiving funds related to what they deemed to be possible
24 fraudulent activity.

25 33. On December 15, 2015, I reviewed a subpoena response from AccountNow pertaining to
26 BURCHARD's PrePaid Visa card, number ending in 1881. The following is a summary of the
27 information:

28 a. Card number ending in 1881 was opened on March 30, 2013 under the name

1 DAVID BURCHARD. The applicant's addresses was **** Duke Ct, Merced, California
2 95348; the phone number was ***-***-2904; the email addresses was
3 ms_1128@yahoo.com; the social security number was ***-**-9743, and the date of birth
4 was **-**-1977. This information matches personal identifying information I have
5 obtained on BURCHARD.

6 b. AccountNow records indicate that from August 12, 2013, until September 25,
7 2014, \$6,540 in cash was uploaded to the card, which was used to conduct purchases
8 from various businesses and retailers, including Amazon, CCBill.com, Target, Costco,
9 Forever 21, and Chevron.

10 c. I therefore concluded that BURCHARD was on the receiving end of the money
11 Money Pak codes provided to him from "fishing01" as payment for the sale of marijuana
12 over the Silk Road.

13 34. On September 11, 2015, I received information from the DEA indicating that the
14 username "caliconnect2" ordered five 37.5 milligram tablets of phentermine for \$99.77 from a Silk
15 Road vendor on August 2, 2013.

16 35. On November 18, 2015, I received further Silk Road data from the FBI on the username
17 "caliconnect2." The following is a summary of the information:

18 a. On April 26, 2013, "caliconnect2" sent a private message to "asianvixen," which
19 stated the following:

20 b. Hey asian vixen...I understand. I made two transactions on this account. I am a
21 vendor also just thought I was not supposed to use my vendor account to make purchases.
22 My vendor name is caliconnect. Is it ok if I order shirt now?"

23 36. Further, on July 18, 2013, "caliconnect2" sent a private message to "TedDanzigSR,"
24 which contained information that would typically appear on an identification card, such as name,
25 address, license number, birthdate, height, weight, and sex. This information appears to have been
26 chosen by BURCHARD for a fraudulent identification document and does not contain his real name,
27 date of birth, or address. The message also stated:

28 a. "Please enter your address below EXACTLY as you'd like it to appear on the

1 mailing label: David Burchard, *** Duke Ct, Merced CA 95348.” It should be noted that
2 BURCHARD has since moved from this residence.

3 37. On August 2, 2013, “caliconnect2” sent a private message to “BenzoKing,” which stated
4 the following:

5 a. “Ok bro...sent you two trans one for 5.3 and another for .15 for the change in btc
6 and to add express shipping. Here is my drop info for shipping. David Burchard, ***
7 Duke Ct, Merced, CA 95348”.

8 38. I believe BURCHARD was “caliconnect2” due to his message to “asianvixen” in which
9 he states he is the vendor “caliconnect.” In addition, “caliconnect2” provided BURCHARD’s name and
10 address for shipping information to “BenzoKing.”

11 39. I also reviewed transactions involving “Caliconnect” selling cocaine on the Silk Road.

12 40. In April 2013, “Caliconnect” posted the following messages:

13 a. “3.5 grams strait off da brick fish scale coke. Straight off the brick and pure as
14 you will find coke. Wish the pics were better because this coke is that real fish scale that
15 shines in the light.”

16 b. “I am fairly new here on SR but if you check my reviews for the mj I also sale
17 you will see that I am very fair and I don’t scam people. Stealth in my shipping is
18 beyond good and I am quick to ship and communicate with my buyers. Thanks, Cali.”

19 41. On April 11, 2013, “Caliconnect” sent the following message to “kazim63:”

20 a. “Hey bro thanks for your order. you are the first on to pick up the white from me
21 so please leave feedback. Yea I will do larger just let me know after you get package we
22 can custom one up for you. will get in mail no later than Friday but maybe today if time
23 allows. Thanks.”

24 42. On April 15, 2013, “Caliconnect” sent the following message to “tomwallisch:”

25 a. “yea had two order that shipped on Saturday. Those are my first. Honestly my c
26 is better deal and quality them the flowers. No lie. Thanks. Cali.”

27 43. On April 16, 2013, “tomwallisch” send “Caliconnect” the following message:

28 a. “Hey man, Super excited to be one of the first testers of this. I took your advice

1 and got just a ball for now. I hope this goes well and product/weight/stealth (had some
2 vendors with sketchy hand-written labels, and several shorting me ha)...I may be crazy
3 but I feel like the longer a vendor is around the shittier the product gets lol, so I am
4 hoping you are straight up and here to stay! I like going back to the same vendors over
5 and over! Looking forward to working more in the future assuming all is legit and
6 product is fire. Take it easy man! I appreciate! Tom”

7 44. On August 17, 2013, “Caliconnect” sent the following message to “jjgreen57:”

8 a. “I can get you really cheap coke at really cheap prices or really good coke at
9 really good prices...you want coke to party with or coke that comes back point for
10 point...sold it for a while on here but some ppl were like trippin bout buying bud from
11 me cuz I was selling coke too so I pulled the ads...I have coke though...1500 an oz on
12 the pure stuff...shit goes up in down in price on a daily basis but shit is great...straight
13 fish scale.”

14 45. A review of purchase orders for “Caliconnect” revealed the following sales related to
15 cocaine:

16 a. On April 11, 2013, the Silk Road buyer “kazim63” bought 3.5 grams of cocaine
17 from “Caliconnect” for 1.81 bitcoin (approximately \$309.05).

18 b. On April 12, 2013, the Silk Road buyer “DonaldSchultz” bought 3.5 grams of
19 cocaine from “Caliconnect” for 2.22 bitcoin (approximately \$311.39).

20 c. On April 15, 2015, the Silk Road buyer “tomwallisch” bought 3.5 grams of
21 cocaine from “Caliconnect” for 3.27 bitcoin (approximately \$310.52).

22 46. A review of feedback for “Caliconnect” from the cocaine buyers posted on the Silk Road
23 revealed the following:

24 a. On April 18, 2013, “DonaldSchultz” posted this message:

25 i. “ATTENTION!! If you pass on this c you are seriously slipping!! This is
26 ABOVE AND BEYOND the quality of the highest price c on SR and cost less.
27 This is that Real Deal Holyfield FISHSCALE!! 10/5 Quality – AMAZING. 10/5
28 Shipping - Only 3 days. 10/5 Stealth - SUPERB!!(Best I've seen yet, very secure).

1 Good vendor to work with and I'll only use him for my future orders, keep this
2 shit on deck Cali!!”

3 b. On April 20, 2013, “tomwallisch” posted this message:

4 i. “Caliconnect is the man, plus his coke is HEAT! Had a great experience,
5 and this guy is very eager to keep everyone happy! I will be around again and
6 again, no doubt!!” “5/5 easily.”

7 47. Other HSI investigators and I reviewed approximately 977 transactions involving
8 “Caliconnect” on the Silk Road and determined that approximately 704 pounds of marijuana and
9 approximately 10.5 grams of cocaine were sold to customers located throughout the United States. The
10 total dollar amount of these transactions involving “Caliconnect” was approximately \$1.43 million from
11 approximately March 2013 through September 2013. Among the data provided to me by the FBI on this
12 list, “Caliconnect” was the third largest U.S.-based vendor on the Silk Road in terms of total sales.

13 **C. *David BURCHARD Sells Marijuana on the Dark-web Site Agora***

14 48. In June 2015, I learned that a vendor on the Agora dark-web marketplace going by the
15 name of “the_real_caliconnect” was advertising to sell marijuana.² The Agora website indicated that
16 this vendor registered on the site one year and five months ago. “The_real_caliconnect” stated it was the
17 same vendor from the Silk Road, Black Market Reloaded, and the Silk Road Two dark web
18 marketplaces and that on all those sites it was ranked in the top one percent of vendors.
19 “The_real_caliconnect” also stated it had over 1000 transactions between those sites and continued to
20 build their customer base on Agora. Information on “the_real_caliconnect’s” vendor page indicated
21 they were in “vacation” mode since approximately May 23, 2015.

22 49. On July 13, 2015, I learned that “the_real_caliconnect” had returned to Agora from
23 “vacation mode.” “The_real_caliconnect” stated “Hey AG Fam...Iam back! And for good now!
24 Listings now up so let’s get this money!” Also, the vendor indicated that it was willing to conduct
25 orders using an Agora escrow account (Agora, like other dark-web marketplaces, allows for purchases to
26

27 ² Agora was a dark-web illegal marketplace that launched in 2013. As with Silk Road, all
28 transactions on Agora were conducted in Bitcoin. The administrators of Agora took it offline in August
2015 to address purported security vulnerabilities. The site has remained offline since that time.

1 put their funds into an escrow account that are not released until the order is received by the purchaser).

2 50. Based on my review of records on the Agora marketplace, from approximately January
3 2014 until approximately July 2015, “the_real_caliconnect” sold approximately 470 pounds of
4 marijuana through approximately 1000 transactions. These totals are based on 50 pages of reviews that
5 customers posted to “the_real_caliconnect’s” vendor account.

6 ***D. David BURCHARD Sends Mail Parcels from a Raley’s Supermarket***

7 51. On September 29, 2015, at approximately 12:00 pm, another HSI investigator and I
8 arrived at the Raley’s store located at 3550 G Street, Merced, California 95340 (the “RALEY’S
9 STORE”), and contacted an employee (hereafter the “Employee”). I showed him/her a picture of
10 BURCHARD, who he/she immediately recognized as a frequent customer who usually ships medium
11 sized flat-rate parcels.

12 52. On September 29, 2015, at approximately 1:02 pm, the Employee contacted me and
13 stated BURCHARD had dropped off three parcels for delivery at the RALEY’S STORE. Intern Mann
14 and I responded to the store and obtained the following information from the packages, which were not
15 seized:

- 16 a. Addressee: Brittany Miller, 500 Dioon Dr, Myrtle Beach, SC 29579.
- 17 b. Addressee: Steph Meyer, 3451 Saland Way, Apt. 218, Jacksonville, FL 32246.
- 18 c. Addressee: Garrett P. Chapin, 202 W. Hanover Pl., Sterling, VA 20164-3623.
- 19 d. Sender on all three packages: Automotion LLC, 3721 Ithaca Ct, Merced, CA
20 95340.

21 53. I conducted a public records check on “Automotion LLC” with negative results. I also
22 learned that 3721 Ithaca Ct is a residential home located one street east of BURCHARD’s former
23 residence, the DUKE CT ADDRESS.

24 54. On October 5, 2015, at approximately 12:47 pm, the Employee informed me that
25 BURCHARD sent three parcels from the RALEY’S STORE at approximately 12:30 pm. I did not
26 obtain pictures of these parcels and did not seize them.

27 55. On October 6, 2015, Raley’s provided me with surveillance camera photos from the
28 RALEY’S STORE. The photos depict a white male resembling BURCHARD mailing three parcels on

1 September 29, 2015, at approximately 12:40 pm, and three parcels on October 5, 2015, at approximately
2 12:23 pm.

3 56. On November 25, 2015, at approximately 1:15 pm, I observed BURCHARD driving the
4 CHEVY TAHOE westbound on East Yosemite Avenue, near North Parsons Avenue, in Merced,
5 California. I followed BURCHARD to the RALEY'S STORE.

6 57. I observed BURCHARD enter the RALEY'S STORE carrying one large parcel. Intern
7 Mann observed BURCHARD mail this parcel at the U.S. Postal counter located within the Raley's.
8 BURCHARD then departed the area at approximately 1:25 pm.

9 58. I subsequently viewed pictures of the parcel BURCHARD mailed, which contained the
10 following information:

- 11 a. Addressee: Mitch Glass, 5189 Ruritan Lake Rd, Palmyra, Virginia, 22963
- 12 b. Return Address: CC Automotive, 1235 Stevens Ct, Merced, California 95340
- 13 c. Tracking Number: 9505 5213 8331 5329 0001 23
- 14 d. I did not seize this package.

15 ***E. David BURCHARD Sells Marijuana on the Dark-web Marketplace AlphaBay***

16 59. On November 13, 2015, Intern Mann took the Pretty Good Privacy (PGP) encryption key
17 utilized by BURCHARD ("the_real_caliconnect") on the dark web marketplace Agora and searched the
18 dark-web search engine "Grams" for other vendors utilizing this PGP key. The search indicated that a
19 vendor named "caliconnect4life" was operating on the dark web site AlphaBay.³ The web address is
20 "pwoah7foa6au2pul.onion/user/php?id=250523&tab=1."

21 60. According to the AlphaBay website, "caliconnect4life" began operating as a vendor on
22 November 10, 2015.

- 23 61. On November 13, 2015, "caliconnect4life" vendor page included the following messages:
- 24 a. Hey Fam...Blue nightmares are Blue Dream X Tahoe OG...same fire I had listed
25 on AB before we all got scammed super fucking work...shit is like indoor no lie...dont
26 sleep."

27 _____
28 ³ AlphaBay is a dark-web marketplace that came to prominence after the takedown of the Silk Road. It is estimated to currently be the largest dark-web marketplace.

1 b. Hey AB Fam...guess we are here now too SMH! Opening shop here now after
2 Abraxas drama...will have work posted 11.12. @ 12noon pst.”⁴

3 62. On December 29, 2015, Fresno Police Department Detective Daniel Vandersluis, in
4 conjunction with Intern Mann and I, conducted a controlled purchase of a half-pound of marijuana from
5 the AlphaBay vendor known as “caliconnect4life.” Investigators utilized the AlphaBay buyer account
6 “Megidido” to purchase the marijuana strain “OG Crack” for approximately \$900.00, or 2.0955 Bitcoin.
7 Investigators requested that the parcel be addressed to “Adam Smith, 701 Washington Street, PO Box 4,
8 Buffalo, New York 14203.”

9 63. On December 31, 2015, AphaBay buyer “Megidido” sent the following message to the
10 AlphaBay vendor “Caliconnect4life:”

11 a. “hey bro hope all is good. imk if u shipped that if u get a chance. Otherwise i’ll
12 check back next week after the new year. i got enough green to get my people thru the
13 weekend.”

14 b. On December 31, 2015, at approximately 2:05 pm, Intern Mann and I observed
15 BURCHARD driving a white Jaguar sedan westbound on East Yosemite Avenue, near
16 North Parsons Avenue, in Merced, California. Intern Mann and I followed
17 BURCHARD’s Jaguar parked at the Raley’s Store located at 3550 G Street, Merced,
18 California 95340.

19 64. At approximately 2:20 pm, Intern Mann and I arrived at the Raley’s store and contacted
20 the Employee, who informed me that BURCHARD had mailed four parcels moments earlier.

21 65. At approximately 4:53 pm, Postal Inspector Trevor Covert informed me that a parcel
22 mailed by BURCHARD from Raley’s was addressed to Adam Smith, 701 Washington Street, PO Box 4,
23 Buffalo, New York 14203. The tracking number was 9505 5213 8331 5365 0005 21, it was a medium
24 flat rate box, and was bearing \$12.65 in postage.

25 66. On January 1, 2016, the vendor “caliconnect4life” sent “megidido” the following
26

27 ⁴ Abraxas was another illegal dark-web marketplace that came to prominence after the takedown
28 of the Silk Road. In November 2015, Abraxas went offline and is no longer a functioning dark-web
 marketplace.

1 messages:

2 a. “your out and look for Saturday bro or Monday because of the holiday friday.”

3 b. “sup bro...hey order went out but outta shirts...sorry...yea putting up oz listings
4 now...btw i gave you free upgrade to blue cookies...they are more expensive but i have
5 been fucking with you for a while so its all good.”

6 67. On January 4, 2016, I retrieved the tracking information for the parcel BURCHARD
7 mailed and noted that the parcel was accepted on December 31, 2015, at 2:10 pm, in Merced, California
8 95340, and was delivered to a PO Box at 2:09 pm on January 4, 2016, in Buffalo, New York 14205.

9 68. On January 5, 2016, I received the parcel BURCHARD sent to Buffalo, New York, from
10 HSI SA Brad Brechler. SA Brechler stated the suspected marijuana weighed approximately 289 grams.
11 I examined the parcel and determined the method of packaging was similar to the parcels sent by
12 BURCHARD and previously seized by HSI Fresno. The suspected marijuana was vacuum sealed in a
13 food saver bag which was then sealed in a moisture barrier bag.

14 69. I turned the parcel and its contents over to Detective Vandersluis. A chemical analysis of
15 the suspected marijuana is pending with the Fresno Police Department.

16 ***F. Homeland Security and the Internal Revenue Service Search BURCHARD’s***
17 ***Residence***

18 70. On January 20, 2016, I obtained a federal search warrant for the GABRIEL
19 RESIDENCE.

20 71. On January 21, 2016, HSI agents, along with investigators and officers from the IRS,
21 USPIS, Merced Police Department, and California Highway Patrol, executed the search warrant at the
22 GABRIEL RESIDENCE.

23 72. At approximately 7:10 am, HSI SA’s conducted a knock and notice on the front door of
24 the residence, and subsequently encountered BURCHARD, MONICA SAUCEDO (BURCHARD’s
25 spouse), and three minor children. HSI SA’s made entry into the residence and secured it without
26 incident.

27 73. SA’s and investigators conducted a search of the residence as authorized by the search
28 warrant and seized numerous computers and other electronic storage devices. I also seized numerous

1 items associated with the distribution of narcotics, including anti-static bags, a digital scale, food saver
2 vacuum sealing bags; Amazon boxes with plastic storage bags; a trash bag containing marijuana, a box
3 containing a sealed bag of marijuana. I also found pieces of clothing apparel with the label
4 “caliconnect.” In addition to this evidence, case agents seized a 2010 Jaguar XF sedan; a Mercedes S63
5 AMG; a 2013 Mercedes C250; and a 2007 Chevy Tahoe

6 74. BURCHARD signed a Department of Homeland Security “Consent to Search” form for
7 two storage units under his control, which included Central Self Storage – Merced, 3 W 23rd Street,
8 Merced, California 95340, Unit 228, and Darrell’s Mini-Storage, 2425 Santa Fe Dr, Merced, California
9 95348, FAC 4, Unit 2459.

10 75. At approximately 10:40 am, HSI case agents searched BURCHARD’s storage unit
11 located at Central Self Storage – Merced, 3 W 23rd Street, Merced, California 95340, Unit 228, and
12 seized a credit card machine with blank cards and other items indicating that BURCHARD was involved
13 in the production of stolen or fraudulent access devices.

14 76. I conducted an interview of BURCHARD at his residence with Internal Revenue Service,
15 Criminal Investigations (IRS) SA Kulbir Mand and Intern Mann. The following is a summary of the
16 interview:

17 a. At approximately 8:05 am, I identified myself to BURCHARD and informed
18 BURCHARD of the purpose of the search warrant and interview. I read BURCHARD
19 his Miranda Rights at 8:10 am and asked BURCHARD if he understood his rights.
20 BURCHARD stated, “Yes sir.” I informed BURCHARD he was not under arrest and not
21 in custody. BURCHARD stated he was willing to answer questions, but would decline or
22 take the “fifth” for questions he did not feel comfortable answering. During the interview
23 BURCHARD provided the following information:

24 b. BURCHARD stated that since 2012 he traded Bitcoin to make money on the
25 website LocalBitcoins.com. He would buy Bitcoin at or below market prices and then
26 sell above the market price to make a profit. He began trading bitcoin in 2012 when the
27 price rose from \$41 to over \$1,200 per bitcoin. He stated many of his clients conduct
28 Bitcoin exchanges with him because they do not want to give up their personal

1 information, which would be required with a legitimate digital currency exchange
2 company. BURCHARD does not know his Bitcoin wallet address and indicated it was
3 on a computer hard drive that he discarded. From 2010 to 2012, he was unemployed and
4 has not sold Bitcoins since his daughter died in June 2015. BURCHARD and his family
5 have been using his deceased daughter's \$100,000 life insurance payment to cover their
6 living expenses. BURCHARD stated his wife, Monica SAUCEDO, have lived together
7 for 18 years and she is employed as a cosmetic dentist. However, they never filed for a
8 marriage license.

9 c. BURCHARD stated "Caliconnect" is the name of his clothing brand, which he
10 filed paperwork to trademark.

11 d. BURCHARD stated he does not sell marijuana through the dark web. He stated
12 he has never mailed marijuana to anyone. He acknowledged that he used to sell
13 marijuana when he was 17 or 18 years old and last grew marijuana in 2011 in the
14 Porterville area.

15 77. At approximately 8:12 am, HSI SA's Andres Varela and Tim Kotman interviewed
16 SAUCEDO. SAUCEDO was informed that she was not under arrest and was read her Miranda rights by
17 SA Kotman. SAUCEDO waived her Miranda rights verbally and in writing at approximately 8:13am.
18 The following is a summary of SAUCEDO's statement:

19 a. SAUCEDO stated she had lived at **** Gabriel Drive, Merced, California 95340
20 (identified above as the GABRIEL RESIDENCE), for approximately two years.
21 SAUCEDO stated prior to living at the Gabriel address she lived at **** Duke Ct,
22 Merced, California 95340 (identified above as the DUKE CT RESIDENCE), for
23 approximately four years. Prior to the Duke Ct address, she lived at *** Shafer Ave,
24 Merced, California 95348, for three years.

25 b. SAUCEDO stated her fiancé, BURCHARD, had not been working for the last six
26 or seven years. SAUCEDO stated she was a stay-at-home mom. SAUCEDO stated the
27 rent was \$1350.00 a month at the Gabriel address.

28 ///

1 **G. *Evidence on BURCHARD's Computer Reveals He Is "Caliconnect"***

2 97. In February, 2016, HSI Computer Forensic Agent (CFA) Ulises Solorio provided me
3 with information he obtained from an Acer laptop and attached thumb drive that was seized in the dining
4 room of BURCHARD's residence. The following is a summary of the information:

5 a. CFA Solorio discovered the black and gold "Caliconnect" logo (currently being
6 used by BURCHARD on the dark-web market AlphaBay) in an image file on the laptop.

7 b. The Onion Router (TOR) browser was found on the laptop, which is used to
8 access the dark-web and anonymize a user's Internet Protocol (I.P.) address.

9 c. CFA Solorio found an image file of BURCHARD's 2014 Supra boat that he sold
10 in August 2015.

11 d. CFA Solorio provided me with decrypted messages found on BURCHARD's
12 thumb drive. BURCHARD used a program called GPG4USB, which automatically used
13 Burchard's Pretty Good Privacy (PGP) private key to decrypt messages sent to him from
14 customers. The GPG4USB program required a password to decrypt messages. CFA
15 Solorio discovered that "asshole209" was the password, which was a password utilized
16 by BURCHARD based on subpoenaed records obtained by me.

17 e. I reviewed the following decrypted message found on BURCHARD's laptop:

18 i. "Adam Smith, 701 Washington Street, PO Box 4, Buffalo, New York
19 14203"

20 ii. "hey bro I sent u a message about the ounces but I'm going to pick up
21 your last HP anyhow. Let me know if u are going to add more. If u still have those
22 old cali shirts throw one in for me if u don't mind, size large. Thanks bro, have a
23 happy new year."

24 78. This address and message are identical to the information provided by SA's who
25 conducted the undercover controlled buy of a half-pound of marijuana from "caliconnect4life" on the
26 dark-web market AlphaBay.

27 79. I noted approximately 49 orders within the decrypted messages from customers who were
28 buying marijuana from BURCHARD. The following is an example of one of those orders:

1 a. "Hey CC, here to order another 2.5 LBs of your STRAWBERRY COUGH! I
2 have two addresses for you. Would you kindly send 2 LBs to: JONATHAN NGUYEN,
3 903 Broad Oaks Dr, Herndon, VA 20170. 1 HP to: TYLER BLACKBURN, 13609
4 Kristin PL, Herndon, VA 20171. Thank you so much! RR"

5 80. CFA Solorio found a Bitcoin wallet and provided the transaction history to me. I noted
6 that on January 4, 2016, the wallet received a 6.154 bitcoin payment and that same day sent out 6.15
7 bitcoin. According to walletexplorer.com (a website that allows you to search for details on bitcoin
8 transactions), the 6.154 payment came from the dark-web market AlphaBay. As previously noted, HSI
9 Fresno SA's conducted a controlled buy with BURCHARD for a half pound of marijuana on December
10 29, 2015, and released the bitcoin payment from an AlphaBay escrow account on January 4, 2016.

11 81. I therefore believe that part of the 6.154 bitcoin transferred to BURCHARD's wallet
12 consisted of the payment made by investigators as part of the purchase of a half-pound of marijuana
13 from "caliconnect4life."

14 82. In addition, it is evident to me that BURCHARD had control of the AlphaBay vendor
15 account "caliconnect4life" and was processing and sending out the parcels from the GABRIEL
16 RESIDENCE.

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1 **IV. CONCLUSION**

2 97. Based upon my training and experience, and on the facts set forth in this Affidavit, there
3 is probable cause to believe that David BURCHARD has violated Title 21, United States Code, Sections
4 841(a)(1) & (b)(1)(C) (Distribution of a Marijuana and Cocaine, Controlled Substances), and 21 U.S.C.
5 § 846 and 841(a)(1) & (b)(1)(C) (Conspiracy to Distribute Marijuana and Cocaine, Controlled
6 Substances). I therefore request that you issue the attached arrest warrant and criminal complaint.
7

8 *Approved as to form:*

9 /s/ Grant B. Rabenn

10 _____
11 Grant B. Rabenn
12 Assistant United States Attorney

13 _____
14 Mathew Larsen
15 Special Agent
16 Homeland Security Investigations

17 Sworn to before me this
18 ____ day of March 2015

19 _____
20 HON. BARBARA A. MCAULIFFE
21 United States Magistrate Judge
22 Eastern District of California
23
24
25
26
27
28