UNITED STATES DISTRICT COURT
for the
District of New Jersey

United States of America v. SHADAB CHOWDHURY Defendant(s)	)	Case No. 18-mj-1023 (AMD)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of stated in Attachment A in the county of Burlington in the District of New Jersey, the defendant(s) violated:

Code Section	*Offense Description*
21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 813; 18 U.S.C. § 2	Distribution and possession with intent to distribute controlled substances and controlled substance analogues ***For further description, see Attachment A.

This criminal complaint is based on these facts:

See Affidavit.

❒ Continued on the attached sheet.

Brent Dickson
Complainant's signature

Brent Dickson, Task Force Officer, DEA
Printed name and title

Sworn to before me and signed in my presence.

Date: August 15, 2018

Judge's signature

City and state: Camden, New Jersey

U.S. Magistrate Judge Ann Marie Donio
Printed name and title

CONTENTS APPROVED

UNITED STATES ATTORNEY

By: *s/Sara Aliabadi*
Sara A. Aliabadi, Assistant U.S. Attorney

Date: August 15, 2018

ATTACHMENT A

COUNTS ONE THROUGH EIGHT
(Distribution of a Controlled Substance Analogue)

On or about the below listed dates, in Burlington County, in the District of New Jersey and elsewhere, the defendant,

SHADAB CHOWDHURY,

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of a controlled substance analogue, as defined in Title 21, United States Code, Section 802(32)(A), namely: Methyl 2-(1-(4-fluorobenzyl)-1H-indazole-3-carboxamido)-3-methylbutanoate ("FUB-AMB"); knowing that the substances were intended for human consumption.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 813, and Title 18, United States Code, Section 2.

Count	Date
1	4/18/16
2	7/14/16
3	7/26/16
4	9/29/16
5	11/16/16
6	3/8/17
7	4/27/17
8	8/31/17

COUNT NINE
(Distribution of a Controlled Substance)

On or about January 30, 2017, in Burlington County, in the District of New Jersey and elsewhere, the defendant,

SHADAB CHOWDHURY,

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of a fentanyl, a Schedule II drug,

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TEN
(Distribution of a Controlled Substance)

On or about July 23, 2018, in Burlington County, in the District of New Jersey and elsewhere, the defendant,

SHADAB CHOWDHURY,

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of a oxycodone, a Schedule II drug,

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

AFFIDAVIT

I, Brent Dickson, a Task Force Officer with the Drug Enforcement Administration ("DEA"), being duly sworn, deposes and states:

AFFIANT BACKGROUND AND PURPOSE OF AFFIDAVIT

1. I have been a Task Force Officer with the DEA since April of 2017. Prior to becoming a Task Force Officer, I was, and am currently still, employed by the Ocean County, New Jersey Sheriff's Department as a Detective in the Field Services Unit, Warrants Division. I have received training as a Police Officer at the Ocean County Police Academy in Ocean County, New Jersey, and I also have attended Task Force Officer School at the DEA Training Academy in Quantico, Virginia.

2. I have participated in several investigations of drug trafficking, including complex investigations requiring the use of undercover agents/officers and confidential sources. I have gained knowledge of various investigative techniques, including the utilization of physical surveillance, undercover agents, confidential informants and cooperating witnesses, the controlled purchases of illegal narcotics, electronic surveillance, consensually monitored recordings, investigative interviews, trash covers, financial investigations, the service of Administrative and Grand Jury Subpoenas, and the execution of search and arrest warrants. Through my training, education, and experience, I have become familiar with the manner in which drug traffickers distribute narcotics as well as the techniques of concealment, packaging and street terminology employed by drug traffickers.

3. This Affidavit is submitted in support of an application for a criminal complaint and an arrest warrant charging SHADAB CHOWDHURY ("CHOWDHURY") with violations of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 813, and Title 18, United

States Code, Section 2. Accordingly, the Affidavit does not set forth all of my knowledge about this matter. Except as otherwise indicated, the actions, conversations, and statements identified in the Affidavit are reported in substance and in part. Similarly, where events are described with reference to dates and times, the events should be read as having occurred on or about or at or about the dates and times referenced.

4. This investigation concerns the unlawful distribution and online sale of controlled substances and controlled substance analogues by CHOWDHURY and his co-conspirators through the use of electronic modes of communication, including email and text, as well as websites such as Website 1, Website 2, and Website 3, to distribute various types of narcotics across the United States.[1] I have personally participated in the investigation described herein, and I am aware of the facts I describe based upon my personal observations, my review of documents and other evidence, my training and experience, and information obtained from other agents and witnesses.

5. I am aware that, during the period described in this Affidavit, law enforcement officers acting in an undercover capacity ordered various quantities of illegal designer drugs and drug analogues popularly known as synthetic cannabinoids, "K2," and/or "spice," from CHOWDHURY. Law enforcement officers ordered these substances online and later received the shipments, as arranged by CHOWDHURY, through the mail in the District of New Jersey. Law enforcement officers also and ordered and received purported Oxycodone pills from CHOWDHURY, which tested positive for fentanyl and/or its analogs, as well as pills that tested positive for Oxycodone.

1 Website 1, Website 2, and Website 3 are websites known to law enforcement.

6. As further described herein, over the period of time described in this Affidavit, law enforcement officers located in New Jersey have ordered and received from CHOWDHURY or individuals working under his control, the following shipments of drugs at an undercover UPS mailbox located in Burlington County, New Jersey, via the United States Postal Service:

a. Twelve shipments of substances that tested positive for Methyl 2-(1-(4-fluorobenzyl)-1H-indazole-3-carboxamido)-3-methylbutanoate ("FUB-AMB"), a synthetic cannabinoid drug that was a controlled substance analogue during the time of the controlled drug purchases by law enforcement officers, as described herein. FUB-AMB was temporarily scheduled into Schedule I as a controlled substance after those controlled purchases.[2] These twelve shipments were received by law enforcement on the following dates: April 18, 2016; July 14, 2016; July 26, 2016 (two shipments); September 29, 2016 (two shipments); November 16, 2016; March 8, 2017; April 27, 2017 (one shipment containing three "inner packages" as explained below); and August 31, 2017 (two shipments).

b. One shipment of drugs in pill form that tested positive for fentanyl, a Schedule II drug. This shipment was received by law enforcement on the following date: January 30, 2017.

c. One shipment of drugs in pill form that tested positive for cyclopropyl fentanyl, a fentanyl analogue at the time of distribution, which was temporarily scheduled into Schedule I after the controlled purchase by law

[2] Because "FUB-AMB" was still an analogue at the time of the sales and not temporarily scheduled, it is charged in the complaint under the Analogue Controlled Substances Act.

enforcement described in this Affidavit. This shipment was received by law enforcement on the following date: August 14, 2017.

d. One shipment of drugs in pill form, that tested positive for oxycodone, a Schedule II drug. This shipment was received by law enforcement on the following date: July 23, 2018.

7. During the course of the investigation, CHOWDHURY has communicated steadily with undercover officers ("UC-1") from January 2016 to July 2018, over email and text message, as described herein, believing UC-1 to be a drug customer. During this time, CHOWDHURY used both Email Address 1 and Email Address 2 to arrange and sell drug shipments to UC-1.[3] As further described herein, law enforcement officers identified CHOWDHURY as the online distributor of the controlled substances and controlled substance analogues charged in this case, based on various sources of information and in various ways, including but not limited to:

a. On multiple occasions, law enforcement officers conducting physical surveillance have observed CHOWDHURY as CHOWDHURY entered and exited the Subject Location.[4] As described herein, the sender of the drug-related emails frequently logged on to the Internet from the Subject Location over the course of this investigation, based on law enforcement officers'

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[3] Email Address 1 and Email Address 2 are email addresses known to law enforcement.

[4] The Subject Location is a residence in Brooklyn, New York believed to be used by CHOWDHURY and his criminal associates to conduct the criminal activity related to the online sale of narcotics. Law enforcement officers have observed CHOWDHURY at this location on multiple occasions.

analysis of Internet Protocol ("IP") addresses associated with Email Address 2;

b. As described below, law enforcement officers ordered a shipment of synthetic cannabinoids on the Internet, and then on April 27, 2017, law enforcement received a shipment consisting of an outer package containing three "inner packages" of FUB-AMB, as explained herein. One of these inner packages bore a fingerprint that matched a fingerprint known to belong to CHOWDHURY[5];

c. Law enforcement officers obtained various email communications from an email search warrant that law enforcement officers executed on Email Address 2, as discussed below. These communications reflect that individuals are addressing communications to the user of that email as "Shadab" or "S Chow." For example, law enforcement officers obtained several transportation receipts that were emailed to Email Address 2. These receipts referred to an individual known as "Shadab" and reflect that Shadab traveled to and from locations that were in the vicinity of the Subject Location;

d. Similarly, on or about March 6, 2017, Email Address 2 received an email from a company that began, "Hey Shadab I'm glad you're happy with the space!" and that attached a property membership agreement for office space.

5 Law enforcement officers conducted an examination for a latent fingerprint lifted from the package of drugs. Based on the Latent Print Examination Report, the latent fingerprint lifted from the package of drugs "was compared to the known fingerprint cards of Shadalo CHOWDHURY aka Shadab CHOWDHURY" and law enforcement learned that the latent fingerprint positively matched CHOWDHURY's own fingerprint, as reflected in a law enforcement database.

This membership agreement listed CHOWDHURY as the "Company/customer" and the "Sole proprietor," as well as the "primary contact" for the office space, and listed CHOWDHURY's title as being the "CEO." The agreement also listed the Subject Location as a billing address for the property membership;

e. Similarly, on about March 15, 2017, an individual sent a package confirmation over email to Email Address 2. The package confirmation reflected that the individual had shipped a package to "S Chow." In the context of this case, I believe that "S Chow" is a reference to Shadab CHOWDHURY;

f. On July 24, 2017, UC-1 sent an email to Email Address 2 and expressed difficulty making a direct deposit payment for the drugs that UC-1 had ordered on the Internet. The user of Email Address 2 directed UC-1 to void the deposit. The user of Email Address 2 then directed UC-1 to mail the payment, in the form of three separate money orders, to "S Chow" at the Subject Location. UC-1 subsequently received the shipment of drugs that UC-1 had ordered (and paid for). In the context of this case, I believe that "S Chow" is a reference to Shadab CHOWDHURY; and

g. While conducting physical surveillance on CHOWDHURY on or about April 20, 2017, law enforcement called the telephone number that had been provided by the sender of the drug-related emails (i.e., the same telephone number that law enforcement previously had contacted over text message to discuss drug shipments, as discussed herein). At the same time that the call to this number went through, law enforcement observed CHOWDHURY as CHOWDHURY took out his telephone and looked at it, consistent with what an individual would do if his phone had just rang. Law enforcement then observed CHOWDHURY put his phone away again, at the same time that law enforcement's call went unanswered.

h. As described herein, UC-1 received an email from Email Address 2, which account law enforcement has strongly tied to CHOWDHURY, indicating that UC-1 should no longer communicate with Email Address 1, which was deleted, and instead should communicate with Email Address 2. The nature of the communications between UC-1 and Email Address 1, and UC-1 and Email Address 2, remained the same following this transition. Because the operator of Email Address 2, believed to be CHOWDHURY based on the evidence described herein, reached out to UC-1 and directed UC-1 to transition from using Email Address 1 to Email Address 2, there is probable cause to believe CHOWDHURY also operated or oversaw the use of Email Address 1.

8. Based on the facts set forth in this Affidavit, there is probable cause to believe that violations of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 813, and Title 18, United States Code, Section 2 have been committed by CHOWDHURY.

FACTS SUPPORTING PROBABLE CAUSE

9. In or about January 2016, the DEA began investigating the unlawful sale and use of illegal designer drugs and drug analogues popularly known as "synthetic cannabinoids," as well as the distribution of purported oxycodone tablets that, the DEA later learned, contained

fentanyl, a fentanyl analogue, as well as actual Oxycodone. Fentanyl is a potent opioid medication that legitimately may be prescribed by medical professionals to help prevent pain. It is a controlled substance, and it is sometimes substituted by narcotics dealers in place of oxycodone. Meanwhile, synthetic cannabinoids are a class of designer drugs that contain, among other things, various substances that are classified as Schedule I Controlled Substances or Controlled Substance Analogues under the Analogue Controlled Substances Act, Title 21, United States Code, Section 813. "K2" and "Spice" are common names used for certain types of synthetic cannabinoids. "K2" and "Spice" are created when damiana or marshmallow leaves – each inert, plant-like, substances – are sprayed with synthetic cannabinoids and treated with synthetic flavoring. The flavored, treated leaves are then smoked by the user.[6]

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[6] By way of further explanation, as set forth infra, cannabinoid drugs are synthetic drugs intended for consumption by humans that produce a "high" in users, and are controlled substance analogues whose distribution for use by humans is in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), 813, and 846.

Oxycodone is a narcotic analgesic (i.e., pain killer) that is similar to morphine and is classified as a Schedule II controlled substance, sometimes prescribed under the brand name OxyContin. See 21 C.F.R. § 1308.12(b)(1)(xiii). Schedule II controlled substances have a high potential for abuse, as well as an accepted medical use, and their abuse could lead to severe psychological or physical dependence. See 21 U.S.C. § 812(b)(2). When properly and medically prescribed, Oxycodone is used to treat severe pain. Even if Oxycodone is taken only in prescribed amounts – and even in amounts as low as 10 milligrams – Oxycodone may cause physical and psychological dependence.

Fentanyl is also a narcotic analgesic that is similar to morphine and is classified as a Schedule II controlled substance prescribed to relieve severe pain. See 21 C.F.R. § 1308.12(c)(9). Like other Schedule II controlled substances, fentanyl has a high potential for abuse. Fentanyl is also known to be a much more potent opiate than an equivalent dosage of oxycodone, and can lead to overdoses even when consumed in smaller amounts. Indeed, during the course of the investigation, law enforcement agents have attempted to avoid directly handling any evidence suspected of containing fentanyl – even for the purpose of counting tablets obtained from controlled purchases – due to the potency of the substance. For the same reason, law enforcement agents have avoided field-testing any suspected fentanyl.

10. Over the course of this investigation, the DEA received information that CHOWDHURY and others known and unknown were using websites, including Website 1, Website 2, and Website 3, to distribute synthetic cannabinoids by shipping them to customers across the country. CHOWDHURY and others also were manufacturing synthetic cannabinoids for human consumption in New York, New Jersey and elsewhere.

11. Over the course of this investigation, law enforcement has reviewed the contents of the aforementioned websites and also has examined the drugs and drug analogues that CHOWDHURY sold to law enforcement officers working in an undercover capacity. Law enforcement has learned that CHOWDHURY deliberately misbrands the synthetic cannabinoids that CHOWDHURY introduces into interstate commerce and sells to customers. Based on my training and experience, I believe that CHOWDHURY deliberately misbrands the drugs in order to, among other things, reduce the chances that law enforcement will detect his illegal drug-trafficking activities. The labeling on the packets of synthetic cannabinoids sold by CHOWDHURY is misleading in several ways, including (1) the labeling does not accurately describe the package's contents or ingredients; (2) the labeling frequently claims that the packages are in compliance with federal law, which they are not; and (3) the labeling commonly states that the product is not intended for human consumption, which is contradicted by CHOWDHURY's own correspondence and actions, as observed by law enforcement officers and as set forth herein.

12. In or about January 2016, law enforcement officers visited Website 1, which advertised numerous types of synthetic cannabinoids. Law enforcement officers learned that customers could order synthetic cannabinoids at Website 1 by creating an online account and

providing their name, mailing address, and email address. Law enforcement officers then created an undercover online account at Website 1, utilizing a false name ("UC-1") and email account ("UC-1 Email"). Law enforcement officers provided a UPS mailbox number for a delivery address in Burlington County, New Jersey to complete the online account ("UC-1 Mail Box"). This delivery address was an address utilized by law enforcement to conduct undercover operations.

13. In or around January 2016, "UC-1" (staffed by law enforcement officers located in New Jersey) began communicating over email with an individual selling synthetic cannabinoid drugs through Website 1. This individual used the email address Email Address 1, and was identified by the email service program as "Troy Chowdhury" and/or "Troy Capo." Based on various open source inquiries, including social media searches and other Internet-based results, the individual was tentatively identified as CHOWDHURY. This identification was later confirmed through fingerprint analysis, physical surveillance, analysis of Internet Protocol ("IP") addresses[7] and other computer-related inquiries, analysis of emails and other communications, review of payment records, and other methods, as discussed herein.[8]

14. In the months that followed, CHOWDHURY and UC-1 exchanged email communications over Email Address 1 and Email Address 2, discussing various controlled

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[7] "Internet Protocol address" or "IP address," as used herein, refers to a unique number used by a computer or other digital device to access the Internet. IP addresses can be "dynamic," meaning that the Internet Service Provider ("ISP") assigns a different unique number to a computer every time it accesses the Internet. IP addresses might also be "static," if an ISP assigns a user's computer a particular IP address that is used each time the computer accesses the Internet.

[8] At all times relevant to this affidavit, CHOWDHURY resided in Brooklyn, New York, and the relevant undercover officers worked in the District of New Jersey.

substances that UC-1 and others could purchase from CHOWDHURY, as well as the pricing for such substances. During these discussions, CHOWDHURY and UC-1 referred to synthetic cannabinoids as "fire" and referred to oxycodone pills as "oxys". Over the course of the investigation, law enforcement purchased multiple shipments of drugs and drug analogues, as described herein, from CHOWDHURY. Law enforcement also exchanged and reviewed electronic communications with CHOWDHURY regarding the suppliers, customers, methodology, and pricing for CHOWDHURY's drug and drug analogue trafficking.[9]

15. For instance, between January 28, 2016 and April 18, 2016, UC-1 exchanged emails with CHOWDHURY at Email Address 1 regarding a substance marketed as herbal tea. This purported tea, law enforcement suspected, was in reality a form of illegal synthetic cannabinoid drugs that were intended for use by humans.

16. Law enforcement ultimately ordered 35.6 grams of the substance for $110.00 dollars in United States Currency. To place this order, law enforcement used a credit card to make an online payment to CHOWDHURY. In return, on April 18, 2016, law enforcement

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[9] Even though CHOWDHURY generally did not identify specific suppliers or other co-conspirators in his correspondence with customers, he frequently referred to different individuals with whom he worked to supply and prepare drugs and drug analogues for sale. As an example, on or about May 9, 2018, in the context of discussing a particular order for oxycodone, CHOWDHURY sent an email to UC-1 from Email Address 2 and asked, "How much did you pay last time? & what was the strength & color of it? I'll try to get the same thing from the same guy". The next day, in the context of further email negotiations about the oxycodone order, CHOWDHURY wrote about how he had "a few guys" he could go to for oxycodone, and offered "speak with [his] guy" regarding pricing. In addition, CHOWDHURY directed UC-1 to deposit various drug payments into an accounts owned and operated by another individual believed to be a family member of CHOWDHURY. These and other email communications sent by CHOWDHURY, including his frequent use of "we" and "our" in communications about drug-trafficking and drug analogue-trafficking activities, support law enforcement's belief that CHOWDHURY is conspiring with several other individuals to traffic drugs and drug analogues.

officers received a package that listed a return address for "Troy Chow" located in Brooklyn, New York. This package contained 35.6 grams of the substance that was marketed as herbal tea. This substance later tested positive for FUB-AMB, which was a controlled substance analogue at the time of the sale. FUB-AMB is substantially similar in chemical structure to N-(1-amino-3-methyl-1-oxobutan-2-yl)-1-(4-fluorobenzyl)-1H-indazole-3- carboxamide ("AB-FUBINACA"), a Schedule I controlled substance.[10] Moreover, FUB-AMB has an effect on the human central nervous system that is substantially similar to AB-FUBINACA.

17. Between the dates of May 19, 2016 and June 10, 2016, law enforcement communicated over email with CHOWDHURY at Email Address 1 regarding a new shipment of synthetic cannabinoid drugs. During this timeframe, Website 1 changed its customer payment plan from Square Up, which is a mobile payments company based in the United States, to GSPAY, which is an online money transfer service based in London, England. Based on my training and experience, and in the context of this case, I believe that this change in payment plan from a United States-based payment company to an English money transfer service was an attempt by CHOWDHURY to conceal his drug-trafficking activities from United States law enforcement.

18. On or about May 19, 2016, UC-1 wrote an email to CHOWDHURY at Email Address 1 stating, in substance and in part, "yo, hey bro, loved the stuff was the best yet. I need help though im trying to order again but you guys switched everything up. my card getting denied I guess cause now its international I think the site said. I have no way to order now. Is

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[10] FUB-AMB was temporarily scheduled into Schedule I in the Fall of 2017, but it has not been permanently scheduled. CHOWDHURY's sales of FUB-AMB to law enforcement officers, as described herein, took place prior to this temporary scheduling.

there any other way I can pay? can I send you WU or something. I have order ready in cart. let me know bro thanks." As part of this investigation, UC-1 was telling CHOWDHURY that UC-1 liked the drugs that UC-1 had ordered from CHOWDHURY, and UC-1 wanted to buy more of them, but UC-1 was having a hard time purchasing them with the new payment structure. UC-1 offered to submit payment to CHOWDHURY via Western Union.

19. On or about May 19, 2016, CHOWDHURY wrote an email from Email Address 1 to UC-1 stating, in substance and in part, "Honestly we got some stuff but it's the last of the old batch it may not be potent if u want the fire then you should wait 5-6 days I'll make it potent." Based on my training and experience, and in the context of this case, I understand that when CHOWDHURY referred to the "fire," he was referring to a particularly potent dose or type of synthetic cannabinoid drugs that are used by humans.

20. On or about May 20, 2016, UC-1 wrote an email to CHOWDHURY at Email Address 1 stating, in substance and in part, "yeah that last shit was fire. I will definitely wait. Just let me know when your good and we can figure out how I can send you the money. if its that fire like last time, as much as you make, ill buy. money not an issue." As part of this investigation, UC-1 was telling CHOWDHURY that UC-1 wants to order a large quantity of particularly potent synthetic cannabinoids, "as much as [CHOWDHURY] make[s]," similar to what UC-1 previously purchased from CHOWDHURY.

21. Over the next several days, UC-1 and CHOWDHURY exchanged additional emails about ordering "fire," and CHOWDHURY stated that he also had "liquids." During this time, CHOWDHURY was using Email Address 1 to communicate with UC-1. Based on my training and experience, and in the context of this case, I understand that when CHOWDHURY

referred to "liquids," he meant that he had liquid synthetic cannabinoids for sale, which I understand are used for human consumption via various methods, such as Vape E-Cigarettes.

22. Between June 13, 2016 and July 13, 2016, UC-1 and CHOWDHURY exchanged more drug-related emails. During this time, CHOWDHURY used Email Address 1 to communicate with UC-1. Ultimately, UC-1 placed an order for 195.4 grams of additional synthetic cannabinoids, including liquid synthetic cannabinoids, in exchange for $514.00 dollars. In these email exchanges, again UC-1 asked CHOWDHURY if there was another way that UC-1 could pay CHOWDHURY for the drug shipments, such as by using Western Union, PayPal or prepaid Visa cards. CHOWDHURY stated, in substance and in part, that "if you wana pay by western union you can to [Email Address 3]."[11] CHOWDHURY also wrote in an email to UC-1 that UC-1 could pay CHOWDHURY by sending the money via Western Union money order to another individual who was located in Brooklyn, New York, and believed to be a family member of CHOWDHURY.

23. On or about June 23, 2016, UC-1 wrote an email to CHOWDHURY at Email Address 1 stating that he wanted to order more "fire." UC-1 stated that he had "many people wanting much more of this if its still fire." As part of this investigation, UC-1 was telling CHOWDHURY that UC-1 intended to further distribute the drugs that he purchased from CHOWDHURY to other individuals for human consumption.[12]

24. On or about June 30, 2016, CHOWDHURY emailed UC-1 from Email Address 1 and stated, in substance and in part, "i need your shipping address before 7 am or it wont ship

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[11] Email Address 3 is an email address known to law enforcement.

[12] DEA agents and Task Force Officers involved with this investigation retained all drugs received in this case as evidence.

today" and "we could only ship half/half anyway your order is too much it can get confiscated." Later that day, UC-1 responded to CHOWDHURY via email and instructed him to ship the synthetic cannabinoids to a false customer name at an address in Burlington County, New Jersey, that is known to law enforcement.

25. On July 13, 2016, UC-1 and CHOWDHURY exchanged additional emails about UC-1 buying synthetic cannabinoids from CHOWDHURY. UC-1 inquired about future shipments, and CHOWDHURY stated, in substance and in part, "I already sent 25g still got another 125g to send."

26. After these email communications, on or about July 14, 2016, a portion of the expected shipment of synthetic cannabinoid drugs was delivered to law enforcement agents at the delivery address UC-1 previously had sent to CHOWDHURY. This package listed a return address for "Troy Chow" at a location in Brooklyn, New York. Law enforcement later tested the substance contained in the package and it tested positive for FUB-AMB.

27. Between July 23 and July 26, 2016, UC-1 wrote to CHOWDHURY at Email Address 1 inquiring about the remaining balance of the shipment of synthetic cannabinoids that UC-1 had ordered from CHOWDHURY. For instance, on or about July 23, 2016, UC-1 wrote an email to CHOWDHURY stating, in substance and in part, "hey bro, just checkin in seein how we makin out with rest of the order?" CHOWDHURY responded, in substance and in part, that he still had "125g left to get." As part of this investigation, UC-1 was telling CHOWDHURY that UC-1 wanted CHOWDHURY to send the rest of his shipment of synthetic cannabinoids; subsequently, I believe, based on the context of the exchange, that CHOWDHURY was indicating that he still had to obtain a portion of the synthetic cannabinoids before he could send the drugs to UC-1. On or about the same date, CHOWDHURY wrote an email to UC-1 stating,

in substance and in part, "i send another 50g you should've received it by now so far i send you 75g man."

28. On or about July 24, 2016, UC-1 received an email from Email Address 1 indicating that CHOWDHURY had sent the rest of the synthetic cannabinoid shipment to UC-1 "on the 19th" and that UC-1 should be patient.

29. On or about July 26, 2016, law enforcement received two packages of drugs from CHOWDHURY, which later tested positive for FUB-AMB. After receiving the drugs on July 26, UC-1 wrote an email to CHOWDHURY at Email Address 1 stating, in substance and in part, "Hey bro, I just picked up two more packages. I didn't weigh them yet but what I got one more coming or was thatcher[sic] rest of the 150g?." CHOWDHURY responded by saying, in substance and in part, "You have more coming."

30. Between September 7, 2016 and September 12, 2016, UC-1 wrote to CHOWDHURY at Email Address 1 to inquire about the remaining synthetic cannabinoids that UC-1 had ordered from CHOWDHURY. For instance, on or about September 7, 2016, UC-1 wrote an email to CHOWDHURY stating, in substance and in part, "Hey bro, haven't heard from u..u good? If u don't have liquids can you send me more incense instead. I got my money ready for another order but I'm waiting to get rest of stuff." Shortly thereafter, CHOWDHURY responded to UC-1 via email and asked, in substance and in part, "Which order?"

31. On or about September 8, 2016, UC-1 wrote to CHOWDHURY at Email Address 1 and provided CHOWDHURY with order number "3622" regarding the shipment of liquid synthetics that UC-1 had ordered from CHOWDHURY. UC-1 also requested sample prices for bulk purchases of synthetic cannabinoids.

32. On or about September 12, 2016, UC-1 contacted CHOWDHURY at Email Address 1 and asked about the liquid synthetic cannabinoids that UC-1 had ordered from CHOWDHURY. Later that same day, CHOWDHURY emailed UC-1 and stated, in substance and in part, "sorry we were really busy we'll send the liquid on your next order."

33. On or about September 20, 2016, UC-1 wrote to CHOWDHURY at Email Address 1 and indicated that UC-1 had placed another order for synthetic cannabinoids and would send the payment for this order soon. The next day, on or about September 21, 2016, UC-1 wrote to CHOWDHURY and stated that UC-1 had sent the payment for the synthetic cannabinoids that UC-1 recently had ordered. Later that day, CHOWDHURY sent an email to UC-1 and asked how much money UC-1 had sent in payment, and UC-1 responded "390.00."

34. On or about September 26, 2016, UC-1 wrote to CHOWDHURY at Email Address 1 and asked about the liquid synthetic cannabinoids that UC-1 had ordered from CHOWDHURY. CHOWDHURY responded, in substance and in part, "you ordered 85 grams i send you over 100 grams & i sent 30 ml thats 6 bottles worth."

35. From on or about September 28, 2016 to on or about September 29, 2016, UC-1 exchanged emails with CHOWDHURY at Email Address 1. In these email exchanges, UC-1 asked CHOWDHURY if UC-1 could purchase synthetic cannabinoids in bulk amounts and receive a discount. CHOWDHURY informed UC-1, in substance and in part, that UC-1 could purchase 500 grams of synthetic cannabinoids for $1,450.

36. On or about September 29, 2016, law enforcement agents received two shipments of synthetic cannabinoids, totaling 161.5 grams, which included liquid synthetic cannabinoids. The substances received (i.e., both liquid and non-liquid synthetic cannabinoids) tested positive for FUB-AMB.

37. From on or about October 21, 2016 to on or about October 25, 2016, UC-1 exchanged emails with CHOWDHURY at Email Address 1. UC-1 stated that he wanted to order 500 grams of synthetic cannabinoids for $1,450. CHOWDHURY suggested that UC-1 separate the payment into smaller amounts, using Western Union to transfer the money, so as not to draw attention to the payments. UC-1 asked if there was another way that he could transfer the money, and CHOWDHURY provided UC-1 with information for a particular wire transfer account at Bank 1 that had been opened in the name of another individual.[13] Based on my training and experience, and in the context of this case, I understand that CHOWDHURY's suggestion to UC-1 that UC-1 separate the money into smaller amounts for deposit was an attempt by CHOWDHURY to conceal his drug-trafficking activities from law enforcement.

38. On or about October 26, 2016, a law enforcement officer deposited $1,450 into the bank account at Bank 1 that was designated by the bank information that CHOWDHURY had provided. UC-1 then wrote an email to CHOWDHURY at Email Address 1, stating that UC-1 had made the payment to CHOWDHURY. In response, CHOWDHURY stated that he was preparing UC-1's order for synthetic cannabinoids and that he was working on a blend of synthetic cannabinoid that supposedly was ten times more potent than the one that UC-1 previously had received. CHOWDHURY told UC-1 over email that the more potent blend would be ready for UC-1 in ten days, and CHOWDHURY asked UC-1, in substance and in part, to "let [CHOWDHURY] know which one [UC-1] want[s] for [UC-1's] customers." UC-1 informed CHOWDHURY that UC-1 was willing to wait the extra ten days so that UC-1 could get the more potent blend of synthetic cannabinoids.

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[13] Bank 1 is a bank known to law enforcement.

39. On or about November 16, 2016, law enforcement received a package of drugs from CHOWDHURY, which later tested positive for FUB-AMB. After receiving the drugs on November 16, UC-1 wrote to CHOWDHURY at Email Address 1 and informed CHOWDHURY he had received the "Package." UC-1 wrote that UC-1 was looking forward to trying the "new batch" that CHOWDHURY had told UC-1 about. On the same date, CHOWDHURY responded to UC-1 and indicated, in substance and in part, that the "new batch was delayed and will be received in a week or two."

40. From on or about November 21, 2016 to on or about November 22, 2016, UC-1 exchanged additional drug-related emails with CHOWDHURY at Email Address 1. In substance and in part, CHOWDHURY indicated to UC-1 that CHOWDHURY had received the "new batch." UC-1 told CHOWDHURY, in substance and in part, that UC-1 wanted to see how good the "new batch" was. UC-1 also asked CHOWDHURY if he could get "powder" or anything else so UC-1 could prepare his own products with synthetic cannabinoids. From my training and experience, and in the context of this case, I understand that the term "powder" refers to the raw, potent, synthetic cannabinoid substance that often is used to make saleable synthetic cannabinoid products that are intended for human use.

41. In an email sent from Email Address 1, CHOWDHURY told UC-1, in substance and in part, that CHOWDHURY does not deal "powder" because he knows another individual who is serving 10 years in jail for dealing "powder." CHOWDHURY stated he runs several different businesses and he does not personally touch any "product," but that he works with other individuals who deal with "product."

42. On November 21, 2016, UC-1 sent an email to CHOWDHURY at Email Address 1 and asked CHOWDHURY what other businesses CHOWDHURY was involved in.

CHOWDHURY indicated that CHOWDHURY worked with "CBD Oil, Weed Edibles, Weed, Coke, Xanax, Airsoft, Pills, Tasers etc." CHOWDHURY stated that CHOWDHURY could get anything UC-1 needs, including "high risk items", and that CHOWDHURY's main business is based out of China. UC-1 also asked CHOWDHURY, in substance and in part, for a quantity of "soft" (which I know, based on my training and experience, is a coded reference to cocaine) and a quantity of "blues" (which I know, based on my training and experience, is a coded reference to Oxycodone).

43. On or about November 24, 2016, CHOWDHURY sent an email from Email Address 1 to UC-1, in which CHOWDHURY asked UC-1, in substance and in part, how many "milligrams" (mg) of oxycodone UC-1 wanted to purchase. UC-1 responded that UC-1 wanted to purchase "30mg" of oxycodone. CHOWDHURY also asked UC-1 "how many do you need? tell me your budget so we can decide on pricing". UC-1 indicated that he wanted to purchase 50 pills, specifically by stating "I was thinking 50 or so for now. If they good quality then I do couple h[u]ndred."

44. On or about December 3, 2016, CHOWDHURY emailed UC-1 from a new email address, Email Address 2, stating, in substance and in part, "hello we deleted our email [Email Address 1] please email us here ([Email Address 2]) or [partial reference to Website 2], We worked out a deal for $20 each for 100 whenver you are ready send the funds and ill express ship it." On or about the next day, December 4, 2016, UC-1 responded to CHOWDHURY's email and stated, in substance and in part, "OK just emailed u at other I will hit You up here. I will

also take few more things so getting loot together. I know you said you rather text I would to and would be much faster and easier for me. U have my # right?"[14]

45. Over the next few days, UC-1 and CHOWDHURY exchanged multiple emails, with CHOWDHURY using Email Address 2. In these emails, CHOWDHURY and UC-1 discussed future shipments and pricing of oxycodone pills. CHOWDHURY also instructed UC-1 to text CHOWDHURY in the future at Cellphone 1.[15] CHOWDHURY further stated to UC-1 that UC-1 should not "mention these words via email." Based on my training and experience, and in the context of this case, I understand that CHOWDHURY's directive that UC-1 should not "mention these words via email" was an attempt by CHOWDHURY to conceal his drug-trafficking activities from law enforcement.

46. Over the next several weeks, UC-1 corresponded with CHOWDHURY via text message about illegal narcotics, using the same telephone number that CHOWDHURY had provided to UC-1 via email (i.e., Cellphone 1). These text communications resulted in UC-1 negotiating narcotics prices with CHOWDHURY and UC-1 making additional narcotics purchases from CHOWDHURY.[16]

47. For instance, in late December 2016 and early January 2017, UC-1 and CHOWDHURY communicated over text message, with CHOWDHURY using Cellphone 1, regarding the pricing for oxycodone pills. As a result of these communications, UC-1 ordered oxycodone pills from CHOWDHURY and sent a sum of United States Currency to

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14 Over the course of this investigation, law enforcement officers also learned that in a bank application to Bank 2 (a bank known to law enforcement), CHOWDHURY had listed his email address as Email Address 2.

15 Cellphone 1 is a cellphone number known to law enforcement.

16 The account for this number was deactivated in early March of 2018.

CHOWDHURY on or about January 11, 2017. On or about January 30, 2017, UC-1 received a package with a listed return address for a location in Houston, Texas. The package contained approximately 100 pills that were blue in color and were labeled in a manner consistent with 30 mg oxycodone pills. These pills later tested positive for fentanyl.

48. On January 30, 2017, UC-1 received an email from CHOWDHURY from the Email Address 2 email account. This email consisted of a self-described "newsletter" advertising products for the customers' "aroma therapy needs." The email stated, in substance and in part, "to be honest we recently been getting some mixed reviews about our last batch of k2 incense (please note this doesn't include our liquid incense which will always be potent) so we decided to go back to our most potent blends from last year! yes if you been a long term customer you should know what were talking about! all im gona say is..it will be the hottest blend on the internet!" The email further described the "new batch," which would "be ready by Tuesday," and noted that "This is Premium HERBAL INCENSE made in USA with 98% purity & grade A potency!" The email included a photo of a new product, "Krazy Jack," which was labeled to be "100 legal herbs." The email also stated that "Krazy Jack" was "5x more potent then[sic] our current inventory" and that it is "not recommended for new Aroma Therapy users. Experienced users looking for the perfect potency should try this one out."

49. The email further stated that CHOWDHURY would be accepting "all credit cards including Visa, Mastercard, Amex & Discover," but that "due to visa/mastercard guidelines[sic] we cant do it directly on the site and has to be done via our dummy site Affranceenligne.com which is actually faster and safer!" Later in this email, CHOWDHURY stated, in substance and in part, "If you are confused about the credit card option then Please text us at [Cellphone 1]." Based on my training and experience, and in the context of this case, I understand that

CHOWDHURY's use of a "dummy site" to circumvent the "visa/mastercard guidelines" was an attempt to conceal his drug-trafficking activities from law enforcement. Also, I note that the phone number, Cellphone 1, was the same phone number that UC-1 had used on several occasions from January through March 2017, in order to contact CHOWDHURY and negotiate pricing and quantities for shipments of drugs and/or analogues.

50. Law enforcement subsequently reviewed records regarding the Voice Over Internet Protocol[17] telephone number Cellphone 1, to determine the various IP addresses used to initiate Voice Over Internet Protocol connections. In the time period from November 1, 2016 to May 1, 2017, law enforcement learned that Cellphone 1 had logged approximately 15,650 IP address connections. Of these 15,650 connections, approximately 12,210 of them originated from the IP address 67.87.170.245. Law enforcement reviewed records from the registered owner of this IP address and learned that this IP was assigned to Subject Location during this time period.

51. Over the next couple of months, UC-1 and CHOWDHURY exchanged additional emails, with CHOWDHURY using Email Address 2, and UC-1 ordered an additional quantity of synthetic cannabinoids from CHOWDHURY. On March 8, 2018, UC-1 received a shipment of drugs that later tested positive for FUB-AMB.

52. On March 21, 2017, CHOWDHURY sent an email to UC-1 from Email Address 2. The email contained a self-described "newsletter" advertising "the purest cbd hemp in the world (literally)." The email stated, in substance and in part, "Due to strict regulations by us feds growing hemp is illegal in usa but we got the product along with designing & manufacturing

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[17] Voice Over Internet Protocol, also known as VoIP, is a methodology and technology for the delivery of communications over IP networks, such as the Internet.

done so it was time finally put these bad boys into market! We like to introduce to you our new brand Firebird! We are currently taking orders prices will get lowered depending on stock." The email included photos of the new products and stated, in substance and in part, "Learn more About us & Why to choose Firebird! For herbal incense you can continue buying from [partial reference to Website 2] & for liquid incense please visit [partial reference to Website 3]." The email from CHOWDHURY further stated that "we recently stopped accepting credit card overall due to the nature of our business & visa/mastercard guidelines" and provided an "e-check" payment option. On or about that same date, UC-1 responded to the above email and asked "What the account I sent to check to or ho[w] does this work? do I do this through my bank?" On or about March 22, 2017, CHOWDHURY responded "no checks get made automatically you just need to read the instructions after checking out."

53. Based on my training and experience, and in the context of this case, I understand that CHOWDHURY's acknowledgement of the "strict regulations by us feds," combined with his acknowledgment that "growing hemp is illegal in usa," reflects CHOWDHURY's knowledge that he is breaking the law when he "put[s] these bad boys into market[.]"

54. In early April of 2017, law enforcement executed a search of the email address of Email Address 2, pursuant to a search warrant issued by Magistrate Judge Ann Marie Donio (17-mj-1004). Law enforcement subsequently reviewed several thousand emails that were sent to and from this email address. Many of these emails contained communications between CHOWDHURY and UC-1, which was consistent with UC-1's own records regarding undercover communications with CHOWDHURY. Many of these emails also contained communications between CHOWDHURY and various other individuals regarding the nationwide distribution of synthetic cannabinoid drugs and other illegal drugs or drug analogues.

55. For example, between March 6, 2017 and March 8, 2017, CHOWDHURY exchanged emails with a self-described "long time customer" in New York regarding an order for a form of "liquid herbal incense K2" believed to be synthetic cannabinoids. Law enforcement later learned that the contact name and shipping address that this customer provided to CHOWDHURY, for purposes of delivering the drug/drug analogue shipment that the customer had ordered, corresponded to a doctor who is affiliated with a university medical center in New York City, New York. Other customers were located in states outside of New York, such as Kansas, North Carolina, South Dakota, West Virginia, Georgia, Ohio, Alaska, California, and Virginia.

56. Between March 27, 2017 and April 20, 2017, UC-1 communicated with CHOWDHURY at Email Address 2. During this time, UC-1 told CHOWDHURY that UC-1 had lost his phone but was interested in purchasing synthetic cannabinoids as well as purchasing oxycodone pills (specifically, approximately 100 pills for approximately $1,500.00 in United States Currency). UC-1 inquired how long it would take to receive such a delivery.

57. CHOWDHURY responded to UC-1 via email on April 11, 2017, using email address Email Address 2. CHOWDHURY told UC-1 that in his last purchase of oxycodone, UC-1 had paid $2,000.00 in United States Currency. CHOWDHURY asked UC-1 how CHOWDHURY could be expected to sell the oxycodone for $1,500.00. UC-1 then asked if he could pay only $15 per pill. CHOWDHURY responded on April 12, 2017, and told UC-1 that the price would vary based on the strength of the pill.

58. On April 17, 2017, UC-1 emailed CHOWDHURY at Email Address 2. UC-1 stated that UC-1 had looked at CHOWDHURY's website, but the site was not working, and therefore UC-1 could not purchase anything. UC-1 asked to purchase 125 grams of synthetic

cannabinoids for $300.00 USC. UC-1 also asked for 30 mg oxycodone pills for $1,500.00. CHOWDHURY told UC-1 that he could provide 100g of synthetic cannabinoids for $300.00 in United States Currency. CHOWDHURY also stated that CHOWDHURY's source of supply for oxycodone could sell UC-1 the oxycodone pills for $1650.00 USC. UC-1 agreed to the prices proposed by CHOWDHURY. UC-1 asked CHOWDHURY asked which account UC-1 should send the payment to, and CHOWDHURY responded by providing UC-1 with a bank account number for Bank 1, into which UC-1 should deposit the payment for oxycodone pills and synthetic cannabinoids.

59. From April 18, 2017 thru April 20, 2017, UC-1 and CHOWDHURY exchanged additional emails about the status of UC-1's order, with CHOWDHURY using the email address Email Address 2. On April 20, 2017, UC-1 provided CHOWDHURY with a delivery address located in New Jersey. This was the same address where UC-1 previously had received drug shipments from CHOWDHURY. CHOWDHURY later sent UC-1 an email and provided UC-1 with a package tracking number for the drugs that CHOWDHURY had just sent to UC-1.

60. On April 27, 2017, UC-1 received a package ("outer package") containing three smaller packages ("inner packages") of synthetic cannabinoids. The tracking number on the outer package corresponded to the tracking number that CHOWDHURY had given to UC-1 a few days prior. Based on fingerprint comparison analyses, law enforcement learned that one of these inner packages contained a latent fingerprint that matched CHOWDHURY's own fingerprint, as described above. The substances in this shipment tested positive for FUB-AMB.

61. Between July 18, 2017 and August 27, 2017, UC-1 communicated extensively with CHOWDHURY via email regarding a new shipment of oxycodone and synthetic cannabinoids. During this time, CHOWDHURY used the email address Email Address 2. UC-1

informed CHOWDHURY that UC-1 had $1,500.00 in United States Currency that UC-1 could use to purchase 100 oxycodone pills. UC-1 also stated that UC-1 wanted to purchase more synthetic cannabinoids. In response, CHOWDHURY told UC-1 over email that CHOWDHURY could not promise to sell oxycodone for UC-1's requested price because CHOWDHURY had obtained a new source of supply for oxycodone and he was no longer in contact with his prior source of supply. UC-1 then inquired about the quality of the oxycodone from CHOWDHURY's new source of supply, and also inquired about whether the new source of supply had any connections to Mexican drug cartels. Ultimately, UC-1 stated that he wished to order 200g of synthetic cannabinoids and 2 bottles of liquid synthetic cannabinoids from CHOWDHURY.

62. Using the same email address, Email Address 2, CHOWDHURY told UC-1 that 200g of synthetic cannabinoids would cost UC-1 $650.00 of United States Currency, and that the 2 liquid synthetic cannabinoids bottles would cost $50.00 of United States Currency. CHOWDHURY also expressed displeasure that UC-1 had explicitly mentioned oxycodone and cartel connections in UC-1's email. CHOWDHURY also told UC-1 that the price of $1,500.00 was acceptable to the new source of supply. At one point during these email communications, CHOWDHURY gave UC-1 the address of the Subject Location as a place where CHOWDHURY might accept payment for the synthetic cannabinoids and/or oxycodone pills. Ultimately, UC-1 and CHOWDHURY agreed that UC-1 would send payment to a particular account at Bank 3 that CHOWDHURY specified.[18]

63. On or about July 24, 2017, UC-1 contacted CHOWDHURY at Email Address 2. UC-1 indicated that UC-1's new bank account was not a business account, and therefore UC-1

[18] Bank 3 is a bank known to law enforcement.

would not be able to deposit the drug payment to CHOWDHURY in the way that CHOWDHURY had requested. UC-1 stated that the bank's tellers had told UC-1 that UC-1 would need to deposit the payment via money orders. UC-1 also informed CHOWDHURY that UC-1 already had deposited the money and the money would take approximately nine days to process.

64. Shortly thereafter, CHOWDHURY responded to UC-1 and directed UC-1 to void the deposit, and instead to mail three United States Postal Service money orders worth $500 each, totaling $1500.00, to "S Chow" at the Subject Location. UC-1 then sent the money orders to CHOWDHURY and also provided CHOWDHURY with tracking numbers for the money orders. CHOWDHURY and UC-1 exchanged additional emails regarding the drug shipments, with CHOWDHURY still using the same email address of Email Address 2.

65. On August 14, 2017, law enforcement received a package containing the purported oxycodone pills that UC-1 had ordered from CHOWDHURY. This package reflected a return address of "Green Street Organics LLC 458, S Green Street Tuckerton NJ 08087." The substance in the pills later tested positive for cyclopropyl fentanyl. On August 31, 2017, law enforcement received two packages of drugs in the mail from CHOWDHURY, which later tested positive for FUB-AMB.

66. Between the dates of April 18, 2018 and June 12, 2018, law enforcement communicated with CHOWDHURY via email at Email Address 2, in order to purchase another shipment of "spice" (synthetic cannabinoids) and to inquire as to whether or not CHOWDHURY still had an available supplier for oxycodone. On April 18, 2018, UC-1 contacted CHOWDHURY to inform CHOWDHURY that UC-1 wanted to purchase a quantity of spice that was equivalent to $500.00 in United States Currency. On this same date, CHOWDHURY

responded via email from Email Address 2 and stated that he could provide UC-1 with both spice and oxycodone.

67. On or about April 18, 2018, CHOWDHURY sent an email from Email Address 2 to UC-1. CHOWDHURY informed UC-1 that the spice was out of stock, but that he could provide UC-1 with oxycodone pills. CHOWDHURY asked UC-1 if UC-1 would agree to pay for the oxycodone pills with bitcoins, and CHOWDHURY provided UC-1 with identifying information corresponding to CHOWDHURY's bitcoin account at Coinbase. From my training and experience, I know that Coinbase is a secure online platform for buying, selling transferring and storing digital currency such as bitcoins. In the context of this case, I believe that CHOWDHURY inquired about the possibility of receiving UC-1's drug payments in bitcoins, which typically involve a higher level of anonymity than some other means of payment, because CHOWDHURY was sensitive to the need to conceal his drug-trafficking activities from law enforcement.

68. Law enforcement subsequently reviewed records regarding CHOWDHURY's bitcoin account at Coinbase, based on the information that CHOWDHURY had provided to UC-1. Law enforcement learned that the Subject Location had been listed by the owner of the account as the reference address for the account. Law enforcement further learned that the account had been accessed on multiple occasions from an IP address that traced back to the Subject Location. Specifically, the bitcoin account had been accessed from the Subject Location on at least 10 occasions between the dates of April 23, 2018 and July 8, 2018.

69. In addition to the emails themselves, law enforcement officers reviewed records relating to Email Address 2. From this review, law enforcement learned that the user of Email Address 2 (i.e., CHOWDHURY) had signed in and out to the email program associated with the

address (i.e., gmail), approximately 1,881 times from the dates of December 14, 2016 to April 13, 2017 from an IP address that traced back to the Subject Location.

70. On or about April 18, 2018, UC-1 informed CHOWDHURY that UC-1 wished to send a money order to pay for UC-1's order of oxycodone, instead of using bitcoins as CHOWDHURY originally had asked. CHOWDHURY agreed to accept payment via a money order, and CHOWDHURY instructed UC-1 to mail the money order to CHOWDHURY at a different address in Brooklyn, New York that is known to law enforcement. On or about May 16 2018, UC-1 sent the requested money order (United States Postal Service, serial #25081001752) to CHOWDHURY in the amount of $500.00 United States Currency. The money order, per CHOWDHURY'S request, was made payable to "Chow Inc" at a location known to law enforcement in Brooklyn, New York.

71. On or about May 29, 2018, CHOWDHURY confirmed that he had received the money order from UC-1 and that the order was being processed. CHOWDHURY then requested a delivery address for CHOWDHURY, and UC-1 asked CHOWDHURY to send the order to an address in Burlington County, New Jersey. Subsequently, on or about June 13, 2018, this money order was made payable to and endorsed by another individual believed to be a family member of CHOWDHURY.[19]

72. On or about May 29, 2018, UC-1 emailed CHOWDHURY at Email Address 2. UC-1 inquired about the delivery date for the oxycodone that UC-1 had ordered. CHOWDHURY responded on June 7, 2018, stating that he sent the package but that he did not have a tracking number. UC-1 and CHOWDHURY subsequently exchanged email

[19] This is the same individual who is previously referenced as the individual believed to be a family member of CHOWDHURY.

communications between June 8, 2018 and July 26, 2018, during which CHOWDHURY assured UC-1 that UC-1's oxycodone order was on its way to the intended destination. During these communications, UC-1 asked CHOWDHURY why UC-1 had not yet received the pills, and CHOWDHURY responded that the delay in delivery was because CHOWDHURY had been deceived by his drug supplier, and so CHOWDHURY had had to order another shipment of pills to send to UC-1, and that shipment was coming from Europe.

73. On or about July 23, 2018, UC-1 received a package of pills at the delivery address in Burlington County, New Jersey that UC-1 previously had provided to CHOWDHURY. The substance in the pills later tested positive for Oxycodone.

74. In summary, all of the above drug and drug analogue shipments that UC-1 ordered from CHOWDHURY were delivered to an address in Burlington County, New Jersey that UC-1 provided to CHOWDHURY. Law enforcement has obtained lab test results for representative samples of each substance involved in each of the shipments. Approximately 12 of the ordered substances tested positive for FUB-AMB, a synthetic cannabinoid drug that was temporarily scheduled into Schedule I after the controlled purchases by law enforcement described in this Affidavit. One shipment tested positive for fentanyl, a Schedule II drug, as described earlier in this Affidavit. One shipment tested positive for cyclopropyl fentanyl, a fentanyl analogue that was temporarily scheduled into Schedule I after the controlled purchase by law enforcement described in this Affidavit. And, one shipment tested positive for oxycodone.

75. Law enforcement has conducted surveillance on the Subject Location and/or CHOWDHURY on several occasions over the course of this investigation, and the surveillance results further support the conclusion that CHOWDHURY uses the Subject Location, including

for criminal activity. For instance, on or about April 17, 2017, at approximately 3:00 p.m., law enforcement observed CHOWDHURY outside the Subject Location interacting with a United Parcel Service (UPS) driver.

76. As another example, on or about April 20, 2017, law enforcement conducted surveillance at the Subject Location. At approximately 2:54 p.m., law enforcement observed CHOWDHURY exit the Subject Location from the door on the right on 39th Street and sit on a set of stairs outside. During this time, CHOWDHURY was smoking a cigarette. While CHOWDHURY was outside, law enforcement called the phone number that CHOWDHURY previously had provided to law enforcement regarding the purchase of synthetic cannabinoids and oxycodone pills (i.e., Cellphone 1). After law enforcement called this telephone number, law enforcement observed CHOWDHURY take his phone out of his pocket and look at it, but decide not to answer it. At or around the same time, law enforcement's call to CHOWDHURY went unanswered.

77. On or about June 6, 2018, law enforcement conducted surveillance at the Subject Location. At approximately 12:40 p.m., law enforcement observed CHOWDHURY exit the residence from the door on the right on 39th Street carrying a laptop computer and enter the driver's side door of a grey, late model BMW vehicle bearing a New York license plate known to law enforcement. Shortly thereafter, CHOWDHURY backed out of the driveway and drove to a carwash, where he remained for a period of time. CHOWDHURY subsequently left the car wash and drove to Coney Island Avenue, where a traffic stop was conducted by a New York City Police Unit. During this traffic stop, law enforcement learned, CHOWDHURY presented his New York State driver's license, bearing the name of Shadab H. CHOWDHURY and listing an

address in Brooklyn, New York,[20] with a date of birth and passport number that was consistent with the name of Shadab Hossain CHOWDHURY. CHOWDHURY also presented a New York State vehicle registration, listed in the name of another individual known to law enforcement believed to be a family member of CHOWDHURY, which was registered to the Subject Location.[21]

78. On or about July 26, 2018, law enforcement conducted surveillance at the Subject Location, while also exchanging email correspondence with CHOWDHURY at Email Address 2. At approximately 7:34 a.m., law enforcement officers posing as UC-1 emailed CHOWDHURY stating "Hey man got the package the other day. I have another $3000 ready to go if u can get your hands on it soon. hit me up as soon as you get this" CHOWDHURY responded at approximately 8:27 a.m., and stated, in sum and substance, "Ok thank god I just didn't want you to think I was tryna scam you just had some delays. im ok with new orders ill just make sure to have it delivered faster this time." During this time, law enforcement was observing the Subject Location for any activity of visitors entering or leaving the Subject Location. Law enforcement did not see any such activity. At approximately 12:50 p.m., law

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[20] Based on law enforcement officers' analysis of information learned from open source databases, law enforcement believes that this location is associated with CHOWDHURY as well as with a different individual believed to be a family member of CHOWDHURY. In addition, various transportation receipts obtained through an email search warrant on the email of Email Address 2 refer to an individual known as "Shaddab" and show him traveling to and from places that are in the vicinity of this location. In my training and experience, I know that drug-traffickers often do not list their exact address when utilizing transportation methods that produce documentation; instead, drug-traffickers often use nearby locations as drop-off and pick-up points, in an effort to conceal their precise movements from law enforcement.

[21] During the traffic stop, CHOWDHURY reportedly appeared nervous and the BMW had a strong odor of marijuana.

enforcement observed CHOWDHURY exit the Subject Location from the door on the right on 39th Street. Based on this surveillance, as well as my own training and experience, and in the context of this case, I understand that CHOWDHURY must have been inside the Subject Location at the same time that he was emailing UC-1 on July 26, 2018 about trafficking drugs and drug analogues.

CONCLUSION

79. Based on the facts set forth in this Affidavit, I respectfully submit that there is probable cause to believe that CHOWDHURY committed the crimes described herein.

80. It is further respectfully requested that this Court issue an Order, pursuant to which the Complaint of the United States and all papers submitted in support of the Complaint be filed under seal until further order of the Court or until CHOWDHURY is arrested on the Complaint.