

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

KAREEM ANTOINE TURNER, and
ALEXANDER DARAVINA,

Defendants.

26 MAG 1298

COMPLAINT

Violations of 21 U.S.C. § 846 and 18
U.S.C. § 924

COUNTY OF OFFENSE:
BRONX

SOUTHERN DISTRICT OF NEW YORK:

HUNTER SCHMITZ, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration (“DEA”), and charges as follows:

COUNT ONE
(Conspiracy to Distribute Narcotics)

1. From at least in or around March 2025 through at least in or around April 13, 2026, in the Southern District of New York and elsewhere, KAREEM ANTOINE TURNER and ALEXANDER DARAVINA, the defendants, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled substance laws of the United States.

2. It was a part and an object of the conspiracy that KAREEM ANTOINE TURNER and ALEXANDER DARAVINA, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute narcotics, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance involved in the offense was 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO
(Firearm Use, Carrying, and Possession)

4. On or about April 13, 2026, in the Southern District of New York and elsewhere, KAREEM ANTOINE TURNER and ALEXANDER DARAVINA, the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the drug trafficking crime charged in Count One of this Complaint, knowingly used and carried firearms, and in furtherance of such crime, possessed firearms.

(Title 18, United States Code, Section 924(c)(1)(A)(i).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

5. I am a Special Agent with DEA currently assigned to a unit which focuses on combatting drug trafficking and money laundering. I have been a Special Agent with DEA for approximately two years. This affidavit is based on my personal involvement in this investigation, my conversations with other law enforcement officers and other individuals, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Background

6. Members of law enforcement have been investigating a network of drug traffickers who, among other things, appear to have converted an apartment within a residential building in Brooklyn, New York, to be utilized for the purpose of manufacturing large quantities of fentanyl into counterfeit pills portioned for wholesale distribution. In particular, the traffickers used the apartment (the “Pill Mill”) to store wholesale-quantities of fentanyl, combine the fentanyl with other fillers, use dyes to color the combined powders, and use large industrial-scale pill presses to create thousands of deadly fentanyl pills at a time. The traffickers used firearms to secure the Pill Mill, and were involved in not only the wholesale manufacture, but also the sale, of illicit narcotics, including fentanyl.

The Turner Phone Number and the Turner iCloud Account

7. Based on my review of records from Apple, I know that an iCloud account (the “Turner iCloud Account”) that is registered under the name “Kareem Turner” is associated with a phone number ending in -7249 that provider records indicate is subscribed in the name “Kareem Turner” (the “Turner Phone Number”) and an email address that contains the name “Kareem Turner” (the “Turner Email Address”). On or about February 9, 2026, the Honorable Katharine H. Parker, United States Magistrate Judge for the Southern District of New York, authorized a warrant to search the Turner iCloud Account. Based on law enforcement review of the Turner iCloud Account, I know it contained multiple messages, photographs, and other data confirming that KAREEM ANTOINE TURNER, the defendant, is the user of the Turner iCloud Account and the Turner Phone Number, including:

- a. the name of the user of the Turner iCloud Account and the Turner Phone Number is listed as “Kareem Turner” in the Turner iCloud Account;
- b. text messages and emails from multiple corporations, including a car-rental company, addressed to “Kareem Turner”;
- c. a bill from an internet provider addressed to “Kareem Turner”;
- d. a permission slip from the United States Probation Office allowing TURNER to travel while on supervised release; and
- e. a New York State interim driving permit for “Kareem Antoine Turner.”

The Daravina Phone Number and the Daravina iCloud Account

8. Based on my review of records from Apple, I know that an iCloud account (the “Daravina iCloud Account”) that is registered under the name “Peter Parker” is associated with a phone number ending in -8676 that provider records indicate is subscribed in the name “Alexander Daravina” (the “Daravina Phone Number”), and an email address which, based on my review of records from Zelle, is associated with a Zelle account under the name “Alexander Daravina.” On or about March 18, 2026, the Honorable Sarah L. Cave, United States Magistrate Judge for the Southern District of New York, authorized a warrant to search the Daravina iCloud Account. Based on law enforcement review of the Daravina iCloud Account, I know it contained multiple messages, photographs, and other files confirming that ALEXANDER DARAVINA, the defendant, is the user of the Daravina iCloud Account and the Daravina Phone Number, including:

- a. multiple emails, including from financial institutions and the New York State Department of Motor Vehicles, addressed to “Alexander Daravina”;
- b. multiple documents relating to a car accident involving DARAVINA, some of which include DARAVINA’s birth date;
- c. pictures of DARAVINA’s social security card, driver’s license, and certificate of U.S. citizenship;
- d. multiple selfies showing DARAVINA; and
- e. multiple screenshots taken during FaceTime calls—some of which are reproduced below—that show DARAVINA’s face.

Turner’s and Daravina’s Participation in a Pill-Pressing Conspiracy

Turner and Daravina Establish and Maintain a Pill Manufacturing Facility

9. Based on my review of its publicly available website and other public sources, I know that a corporation (“Supplier-1”) sells pill presses, mixers, and powders used to manufacture pills. Based on my review of records from Supplier-1, I know the following:

a. On or about March 31, 2025, an individual whom I believe to be KAREEM ANTOINE TURNER, the defendant, ordered one kilogram of “baby blue” Firmapress¹ powder to be shipped to an address in Brooklyn, New York. The order listed the name “Kareem Turner” and the Turner Email Address.

b. On or about April 16, 2025, the same individual, *i.e.*, TURNER, appeared to order another kilogram of “baby blue” Firmapress powder, to be shipped to the same address.

10. Based on my review of the Turner and Daravina iCloud Accounts, and based on my conversations with other members of law enforcement, I know that both accounts contained extensive evidence of production and sale of narcotics pills by KAREEM ANTOINE TURNER and ALEXANDER DARAVINA, the defendants, including:

a. ***Photographs of narcotics.*** The Turner iCloud Account contained multiple photographs and screenshots of what appear to be narcotics, including a screenshot that appears to have been taken during a FaceTime call and shows what appears to be a large quantity of blue M30² pills, which are often manufactured using, among other things, blue Firmapress powder of the kind that TURNER ordered from Supplier-1.

b. ***Pill-press operations.*** The Turner iCloud Account contained approximately dozens of photographs of what appear to be equipment and ingredients used, based on my training and experience, to press pills and manufacture illegal narcotics, including as depicted below:



Pill Press



Pill-Press Component

¹ Based on my training, experience, and involvement in this case and others, I know that Firmapress is a pharmaceutical-grade excipient powder used as a binding agent to make pills, and that blue powder is often used in conjunction with fentanyl to mimic pharmaceutically manufactured opioids, including oxycodone.

² Based on my training, experience, and involvement in this investigation and others, I know that “M30” is a tablet imprint used to identify the 30mg dosage of oxycodone; these round, blue pills are frequently counterfeited with, in particular, fentanyl and analogues.

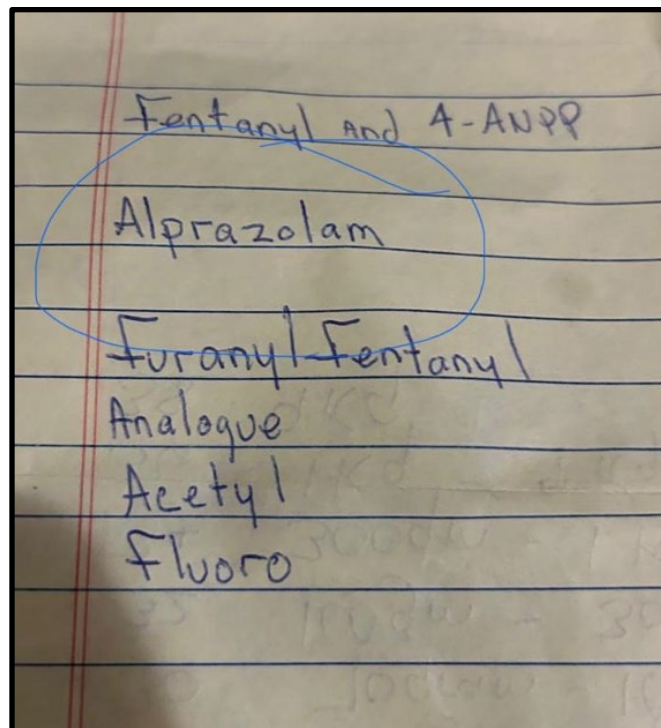


Firmapress Powder



Dyes

c. ***Technical information used in the manufacture of fentanyl.*** The Turner iCloud Account contained multiple photographs and screenshots of information that appear to be related to the manufacture of fentanyl, analogues, and pills, including the following:



Handwritten Summary of Fentanyl Ingredients

Symptom	Possible Cause	Possible Solution
Double tablets	Previous tablet did not eject correctly.	Remove the double tablet manually from the Die bore.
	Excess granular materials were placed in the Die, which prevented the ejection of the existing tablet.	Clean the Tooling to remove any excess granular materials and make sure that it is clean and completely dry.
Cracked or broken tablets	There are problems with the formulation of the granules and ingredients.	If the machine is able to make tablets with LFA's Firmapress®, then the problem is your mix. Adjust your formulation. If still an issue, contact LFA for support.
	The Boot is not feeding enough material to be pressed in tablet form.	
	There is excess pressure.	Please read our article on Capping at https://www.lfatabletpresses.com/articles/tablet-capping
Shattered tablets	The Boot Timing Bar and the Boot are not adjusted properly.	Adjust the Boot Timing Bar by loosening/tightening its bolt and moving it.
	Air is becoming trapped in the tablet during compression.	Please read our article on Capping at https://www.lfatabletpresses.com/articles/tablet-capping
Inconsistent Tablet Weight	The Lower Drift Pin Assembly Locking Bar is loose.	Check that the Lower Drift Pin Assembly Locking Bar is secured to the Lower Drift Pin Assembly and the Lower Drift Pin Assembly Cogs.
	Not enough pressure is being exerted.	Rotate the Upper Drift Pin Assembly clockwise.
	There are flowing issues with the mix.	If the machine is able to make tablets with LFA's Firmapress®, then the problem is your mix. Adjust your formulation. If still an issue, contact LFA for support.
Soft tablets	There is too little punch pressure.	Rotate the Upper Drift Pin Assembly clockwise.
	There are flowing issues with the mix.	If the machine is able to make tablets with LFA's Firmapress®, then the problem is your mix. Adjust your formulation. If still an issue, contact LFA for support.
Uneven tablets	The Tooling is worn out.	Check the ingredients of your formula before you replace the Die, Upper Punch, and Lower Punch.

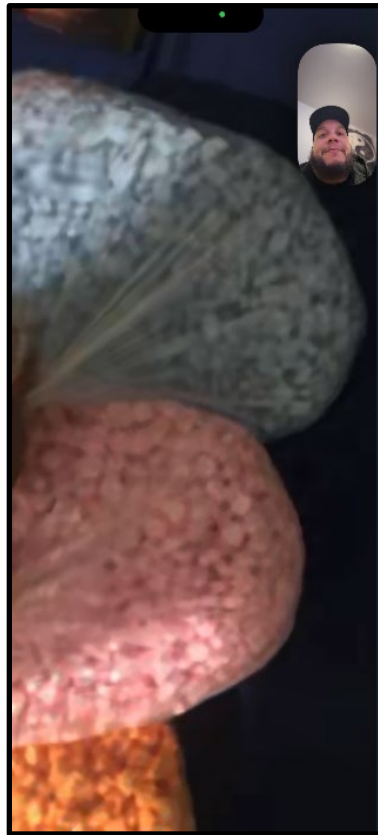
Screenshot of Troubleshooting Guide to Problems Encountered while Pressing Pills

Certificate of Analysis			
Name of the Product	N-BOC-4-PIPERIDONE		
Bach No	NBOC-01724	CAS No	79099-07-3
Quantity	500.0 Kg	Analysis completed on	16/09/2024
Analytical Report No	AR/INT/NBOC/001724	Mfg.Date	Jul'-2024
		Re-Test Date	Jun'-2025
S.No.	TEST	Specifications	Results
1.	Description	White to yellow powder	White powder
2.	Solubility	Soluble in methanol	Complies
3.	Identification by GC	The retention time of main peak of test sample should match with the retention time of main peak of standard	Complies
4.	Water by KF (% w/w)	Not more than 0.5	0.3
5.	Melting range (°C)	Melts Between 72 and 76	73.2°C – 75.4°C
6.	Loss on drying (% w/w)	Not more than 1.0	0.4
7.	Purity (By GC, Area normalization)	Not less than 99.0	99.7
Remarks	The material Complies / does-not-complies to the specifications		
Storage Condition	Store the material at Ambient temperature		

Certificate of Analysis for Fentanyl Precursor N-BOC-4 Piperidone

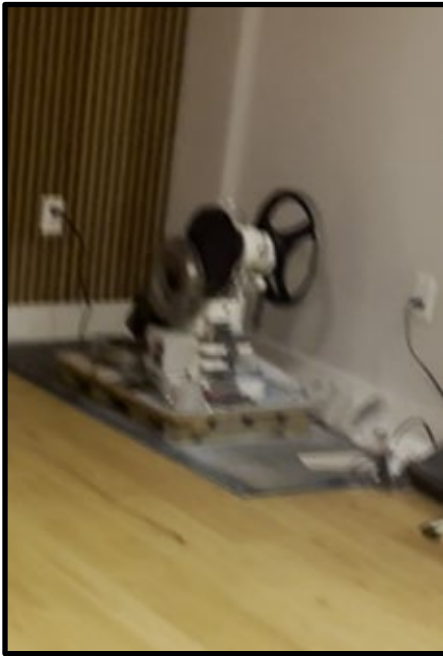
d. **Screenshots of Daravina on FaceTime calls showing pills.** The Daravina iCloud Account contained screenshots of Daravina on FaceTime calls in which the counterparty's

camera showed bags of what, based on my training and experience, I believe to be multicolored narcotics pills. One such screenshot is depicted below.



e. ***Messages regarding drug sales.*** The Daravina iCloud Account contained multiple references to fentanyl, including a message on or about April 28, 2025, in which DARAVINA wrote to another individual listing the narcotics that DARAVINA had for sale: “U need fatty... shrooms... 30’s... Es...etc... I got direct access.” Based on my familiarity with drug slang, I know that “fatty” is slang for fentanyl, “30’s” is slang for M30 pills, and “E” is slang for ecstasy.

f. ***Videos of pill-press machine.*** The Daravina iCloud Account contained multiple videos and images of a pill-press machine. One of the images appears to show a man setting up or using the machine.



Still Image of a Pill Press Machine



Still Image of a Man Setting Up or Using a Pill-Press Machine

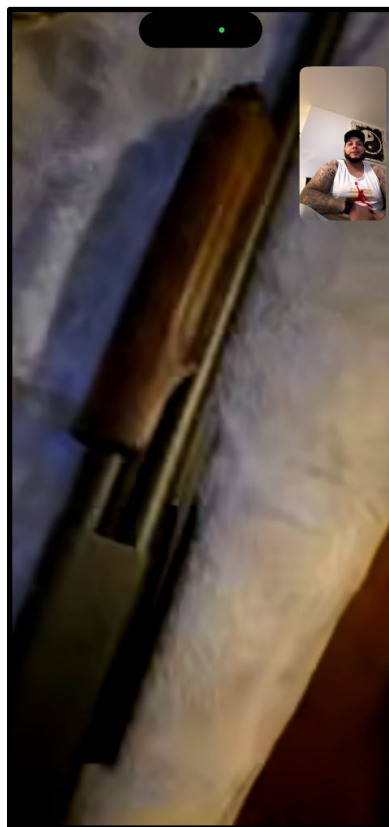
g. ***Messages and Google search for pill press machine.*** On or about August 29, 2025, the Daravina Phone Number sent the Turner Phone Number via WhatsApp a Google search link that leads to search results for “pill press machine.”

h. ***Messages regarding procuring parts for pill-press machine.*** On or about January 11, 2026, the Daravina Phone Number messaged another individual (“CC-1”) asking if CC-1 knew anyone who could “make me [the] funnel from pill machine” using a 3D printer. On or about the next day, CC-1 asked DARAVINA for a picture of the funnel. Approximately two minutes later, DARAVINA messaged the Turner Phone Number asking for a picture of the funnel. Based on my conversations with other members of law enforcement, I further know that location data obtained pursuant to a judicial warrant indicated that the cellphone using the Daravina Phone Number was in the Bronx at the approximate time that DARAVINA sent the above messages.

i. ***Evidence of firearms.*** The Daravina iCloud Account contained multiple photographs, screenshots, and videos of DARAVINA examining guns, two of which are shown below.



Screenshot of DARAVINA (in Inset) Looking at a Handgun During a FaceTime Call



Video of DARAVINA (in Inset) Looking at a Shotgun During a FaceTime Call

Turner and Daravina Use a Residential Apartment to House a Pill Factory

11. As set forth below, KAREEM ANTOINE TURNER and ALEXANDER DARAVINA, the defendants, appear to have manufactured, stored, and sold narcotics in an apartment building (“Building-1”) in the Bedford Stuyvesant neighborhood of Brooklyn. Specifically, TURNER and DARAVINA maintained the Pill Mill—a narcotics production facility—in a particular lower-floor apartment of Building-1, while TURNER appears to have lived in a particular upper-floor apartment of Building-1 (the “Turner Apartment”).

a. ***Surveillance showing Turner’s and Daravina’s presence at Building-1 and conduct consistent with drug transactions.*** Based on my participation in this investigation, including my participation in surveillance operations, I know that TURNER and DARAVINA were observed on multiple occasions in or around January, February, and March 2026 entering and exiting Building-1. On some occasions, TURNER was observed exiting Building-1, entering a car, leaving the car after a few minutes, and reentering Building-1. On many occasions, including, for example, on or about February 5, 2026, TURNER and other individuals were

observed exiting Building-1 holding weighted small plastic bags. Based on my training and experience, such conduct is consistent with the transport and sale of narcotics.

The Pill Manufacturing Facility is Dismantled by Law Enforcement

12. Based on my participation in this investigation I know that, on or about April 7, 2026, the Honorable James R. Cho, United States Magistrate Judge for the Eastern District of New York, authorized warrants to search the Pill Mill and the Turner Apartment at Building-1 (the “Building-1 Warrant”).

13. Based on my participation in this investigation, participation in the execution of the Building-1 Warrant, and discussions with other members of law enforcement, I know that, on or about April 13, 2026, members of law enforcement searched the Pill Mill. During the search, members of law enforcement discovered the defendants' pill manufacturing facility, including a pill-press machine with an appearance and at a location that appear to be identical to the machine depicted in the Daravina iCloud Account as shown above.



The Pill Mill

14. Members of law enforcement also found large quantities of narcotics in various stages of production, some of which are shown above, including finished blue pills, multiple bags of orange, brown, and white powders, and at least two packages containing a kilogram of powder each. Based on my participation in the above-mentioned search and conversations with other members of law enforcement, I know that members of law enforcement field-tested multiple bags containing suspected narcotics powders found in the Pill Mill, and that approximately six samples tested positive for fentanyl, including a sample taken from one of the above-mentioned sealed packages containing a kilogram of powder. In ongoing testing, multiple kilograms of suspected narcotics found in the Pill Mill have tested positive for fentanyl.

15. Members of law enforcement also found in the Pill Mill, among other things, the following supplies, equipment, and materials used to manufacture wholesale quantities of illicit pills:

- a. An automated tablet press which appears to be similar to a machine made by Supplier-1 and which, according to Supplier-1's website, is capable of producing approximately 4,800 tablets an hour;
- b. A hand-operated tablet press machine;
- c. Two kilogram presses and multiple kilogram plates;
- d. A mixing machine;
- e. A food processor and multiple sifters;
- f. Kilogram quantities of blue excipient powders and other pill-pressing ingredients; and
- g. Blacked out windows and bucket chairs with no other furnishings.

Turner and Daravina Used Firearms to Protect the Drug Production Facility

16. In the Pill Mill, members of law enforcement also recovered two loaded handguns concealed within a speaker. One of the guns had an extended magazine, as shown below (after law enforcement had disassembled it).



Firearms and Magazines Recovered from the Pill Mill

17. Members of law enforcement also discovered KAREEM ANTOINE TURNER, the defendant, in the Turner Apartment. During the law enforcement search of the Turner Apartment, members of law enforcement observed multiple items and surfaces covered in blue residue similar in appearance to the residue found in the Pill Mill. Based on my training, experience, and involvement in this investigation and others, I believe the blue residue found in the Pill Mill and the Turner Apartment is Firmapress or another dye used in the manufacture of illicit M30 pills.

18. WHEREFORE, I respectfully request that KAREEM ANTOINE TURNER and ALEXANDER DARAVINA, the defendants, be imprisoned or bailed, as the case may be.

HUNTER SCHMITZ
Special Agent
Drug Enforcement Administration

Sworn to before me this 14th day of April 2026.

THE HONORABLE KATHARINE H. PARKER
United States Magistrate Judge
Southern District of New York