

The Hon. Michelle L. Peterson

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. ENOC MARTINEZ LOPEZ,
2. MANUEL GARCIA MUNOZ,
3. CASEY LANDIS,
4. ADAM WISNIEWSKI,
5. JESSE WITTEVEEN, and
6. CORBIN SAUNDERS,

Defendants.

NO. MJ22-573

COMPLAINT FOR VIOLATIONS OF
21 U.S.C. §§ 841(a)(1) and 18 U.S.C §§
924(c)

BEFORE The Honorable United States Magistrate Judge Michelle L. Peterson, United
States Courthouse, Seattle, Washington.

COUNT 1

(Conspiracy to Distribute Controlled Substances)

Beginning at a time unknown, and continuing until at least November 28, 2022,
in Whatcom County, Skagit County, within the Western District of Washington, and
elsewhere, ENOC MARTINEZ LOPEZ, MANUEL GARCIA MUNOZ, CASEY

1 LANDIS, ADAM WISNIEWSKI, and JESSE WITTEVEEN, and others known and
2 unknown, did knowingly and intentionally conspire to distribute controlled substances,
3 including: heroin, methamphetamine, and N-phenyl-N-[1-(2-phenylethyl)-4-
4 piperidinyl] propanamide (fentanyl), substances controlled under Title 21, United States
5 Code.

6
7 It is further alleged that with respect to ENOC MARTINEZ LOPEZ, MANUEL
8 GARCIA MUNOZ, ADAM WISNIEWSKI, JESSE WITTEVEEN, and CASEY
9 LANDIS, their conduct as members of the conspiracy charged in Count 1, which
10 includes the reasonably foreseeable conduct of other members of the conspiracy
11 charged in Count 1, involved 400 grams or more of a mixture and substance containing
12 a detectable amount of fentanyl, in violation of Title 21, United States Code, Sections
13 841(b)(1)(A).

14 All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

15 **COUNT 2**

16 **(Possession of Fentanyl with Intent to Distribute)**

17 On or about April 18, 2022, in Whatcom County, within the Western District of
18 Washington, ADAM WISNIEWSKI did knowingly and intentionally possess, with the
19 intent to distribute, and aid and abet the possession of, with the intent to distribute, a
20 controlled substance, including fentanyl, a substance controlled under Title 21, United
21 States Code.

22
23 It is further alleged that the offense involved 40 grams or more of a mixture and
24 substance containing a detectable amount of fentanyl.

25 It is further alleged that this offense was committed during and in furtherance of
26 the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

27 All in violation of Title 21, United States Code, Sections 841(a)(1) and
28 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 3

(Unlawful Possession of a Firearm)

On or about April 18, 2022, in Whatcom County, within the Western District of Washington, ADAM WISNIEWSKI, knowing he had been convicted of the following crime punishable by a term of imprisonment exceeding one year:

- i. *Unlawful Possession of a Controlled Substance with Intent to Deliver (Heroin)*, in Whatcom County Superior Court, under case number 11-1-00767-0, on or about August 25, 2011;

did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is a Harrington & Richardson (Heckler & Koch), Model HK4, .380 caliber pistol, with serial number HR06139; that had been shipped and transported in interstate and foreign commerce

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 4

(Distribution of a Heroin)

On or about June 15, 2022, in Skagit County, within the Western District of Washington, and elsewhere, MANUEL GARCIA MUNOZ, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including heroin, a substance controlled under Title 21, United States Code.

It is further alleged that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All 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.

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COUNT 5

(Unlawful Possession of a Firearm)

On or about June 23, 2022, in Whatcom County, within the Western District of Washington, ADAM WISNIEWSKI, knowing he had been convicted of the following crime punishable by a term of imprisonment exceeding one year:

- i. *Unlawful Possession of a Controlled Substance with Intent to Deliver (Heroin)*, in Whatcom County Superior Court, under case number 11-1-00767-0, on or about August 25, 2011;

did knowingly possess, in and affecting interstate and foreign commerce, firearms, that is a Sig Sauer, Model P320 Carry, 9mm Parabellum caliber pistol, with serial number 58B025078, and a Ruger, Model LC9S, 9mm Parabellum caliber pistol, with serial number 329-54468; that had been shipped and transported in interstate and foreign commerce

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 6

(Distribution of Controlled Substances)

On or about August 31, 2022, in Whatcom County, within the Western District of Washington, and elsewhere, ENOC MARTINEZ LOPEZ, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including fentanyl and heroin, substances controlled under Title 21, United States Code.

It is further alleged that the offense involved 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Sections 841(b)(1)(B).

It is further alleged that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

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

3 **COUNT 7**

4 **(Possession of Controlled Substances with Intent to Distribute)**

5 On or about October 11, 2022, in Whatcom County, within the Western District
6 of Washington, CASEY LANDIS did knowingly and intentionally possess, with the
7 intent to distribute, and aid and abet the possession of, with the intent to distribute, a
8 controlled substance, including fentanyl and methamphetamine, substances controlled
9 under Title 21, United States Code.
10

11 It is further alleged that this offense involved 40 grams or more of a mixture and
12 substance containing a detectable amount of fentanyl, in violation of Title 21, United
13 States Code, Sections 841(b)(1)(B).

14 It is further alleged that this offense involved 5 grams or more of
15 methamphetamine, its salts, isomers or salts of its isomers or 50 grams or more of a
16 mixture or substance containing a detectable amount of methamphetamine, its salts,
17 isomers or salts of its isomers, in violation of Title 21, United States Code, Sections
18 841(b)(1)(B).

19 It is further alleged that this offense was committed during and in furtherance of
20 the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

21 All in violation of Title 21, United States Code, Sections 841(a)(1) and
22 841(b)(1)(B), and Title 18, United States Code, Section 2.
23

24 **COUNT 8**

25 **(Possession of Controlled Substances with Intent to Distribute)**

26 On or about November 2, 2022, in Whatcom County, within the Western District
27 of Washington, JESSE WITTEVEEN did knowingly and intentionally possess, with the
28 intent to distribute, and aid and abet the possession of, with the intent to distribute, a

1 controlled substance, including fentanyl and methamphetamine, substances controlled
2 under Title 21, United States Code.

3 It is further alleged that the offense involved 40 grams or more of a mixture and
4 substance containing a detectable amount of fentanyl, in violation of Title 21, United
5 States Code, Sections 841(b)(1)(B).

6 It is further alleged that this offense involved 50 grams or more of
7 methamphetamine, its salts, isomers or salts of its isomers or 500 grams or more of a
8 mixture or substance containing a detectable amount of methamphetamine, its salts,
9 isomers or salts of its isomers, in violation of Title 21, United States Code, Sections
10 841(b)(1)(A).

11 It is further alleged that this offense was committed during and in furtherance of
12 the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

13 All in violation of Title 21, United States Code, Sections 841(a)(1) and
14 841(b)(1)(A) and (B), and Title 18, United States Code, Section 2.

15 **COUNT 9**

16 **(Unlawful Possession of Firearms)**

17 On or about November 2, 2022, in Whatcom County, within the Western District
18 of Washington, CORBIN SAUNDERS, knowing he had been convicted of the
19 following crimes punishable by a term of imprisonment exceeding one year:
20

- 21
- 22 i. *Unlawful Possession of a Controlled Substance with Intent to*
23 *Deliver (Heroin) and Unlawful Possession of a Controlled*
24 *Substance with Intent to Deliver (Methamphetamine), in*
25 *Whatcom County Superior Court, under case number 16-1-*
26 *00162-1, on or about July 11, 2019; and*
 - 27 ii. *Theft in the Second Degree and Forgery, in Whatcom County*
28 *Superior Court, under case number 18-1-00301-37, on or*
about July 11, 2019;

1 did knowingly possess, in and affecting interstate and foreign commerce, firearms, that
2 is:

- 3 i. KE Arms, Model KP-15, 5.56x45mm NATO/.223 REM
4 caliber rifle, with serial number KM05791;
5 ii. Canik, Model TP9 Elite Combat, 9mm Parabellum caliber pistol,
6 with serial number BN05248;

7 that had been shipped and transported in interstate and foreign commerce

8 All in violation of Title 18, United States Code, Section 922(g)(1).

9 **COUNT 10**

10 **(Distribution of a Fentanyl)**

11 On or about November 9, 2022, in Skagit County, within the Western District of
12 Washington, and elsewhere, ENOC MARTINEZ LOPEZ, and others known and
13 unknown, did knowingly and intentionally distribute, and aid and abet the distribution
14 of, a controlled substance, including fentanyl, a substance controlled under Title 21,
15 United States Code.

16 It is further alleged that this offense involved 40 grams or more of a mixture and
17 substance containing a detectable amount of fentanyl.

18 It is further alleged that this offense was committed during and in furtherance of
19 the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

20 All in violation of Title 21, United States Code, Sections 841(a)(1) and
21 841(b)(1)(B), and Title 18, United States Code, Section 2.

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1 The undersigned complainant, being duly sworn, hereby deposes and says as
2 follows:

3 **INTRODUCTION AND AGENT BACKGROUND**

4 1. I, Joseph T. Cheng, am a law enforcement officer of the United States
5 within the meaning of 18 U.S.C. § 2510(7) and empowered by law to conduct
6 investigations of, and to make arrests for, offenses enumerated in 18 U.S.C. § 2516.

7 2. I am a Special Agent (SA) with the Drug Enforcement Administration
8 (DEA), United States Department of Justice. I have been so employed since August
9 2006. In connection with my official DEA duties, I investigate criminal violations of
10 the federal narcotics laws, including but not limited to, Title 21, United States Code,
11 Sections 841, 843, 846, and 848. I am currently assigned to the Bellingham Resident
12 Office of the DEA's Seattle Field Division. My current assignment involves
13 investigations of high-level drug trafficking organizations within the Western
14 Washington area and elsewhere.

15 3. I have completed the DEA Basic Agent Training Course as well as other
16 training courses related to gangs and narcotics trafficking. I have participated in
17 narcotics investigations at both the local and federal level, and I have participated in
18 numerous federal search warrants. As a result, I have become familiar with methods of
19 operation of drug traffickers and organizations. As a Special Agent with the DEA, I
20 have the responsibility of working with other federal and state law enforcement officers
21 in investigations of violations of federal and state controlled substance laws, including
22 the investigation of the distribution of controlled substances including fentanyl and its
23 analogues, cocaine, methylenedioxymethamphetamine (MDMA), methamphetamine,
24 heroin, marijuana, and other dangerous drugs.

25 4. I have interviewed numerous drug dealers, drug users, and knowledgeable
26 confidential informants about the lifestyles, appearances, and habits of drug dealers and
27 users. I have become familiar with the manner in which narcotics traffickers smuggle,
28 package, transport, store, and distribute narcotics, as well as how they collect and

1 launder drug proceeds. I am also familiar with the manner in which narcotics
2 traffickers use telephones, cellular telephone technology, internet, pagers, coded
3 communications and slang-filled conversations, false and fictitious identities, and other
4 means to facilitate their illegal activities and mislead law enforcement investigations. I
5 have had discussions with other law enforcement personnel about the packaging and
6 preparation of narcotics, the methods of illegal narcotics traffickers, and the security
7 measures that narcotics traffickers often employ. I have examined narcotics customers'
8 supplier lists, pay/owe ledgers maintained by traffickers, and other documentation
9 related to narcotics trafficking. I have also examined documentation of various
10 methods by which methamphetamine, cocaine, marijuana, heroin, and other illicit drugs
11 are smuggled, transported, and distributed. I have participated in hundreds of hours of
12 surveillance of narcotics traffickers. During surveillance, I have personally observed
13 narcotics transactions, counter surveillance techniques, and the ways in which narcotics
14 traffickers conduct clandestine meetings.

15 5. I have also participated in investigations that involved the interception of
16 wire communications, including four investigations of large-scale drug trafficking
17 organizations in which I was the case agent and each of which resulted in the conviction
18 of approximately 20 individuals on federal drug-related charges. In addition to these
19 cases, I have participated in numerous other wiretap investigations in a variety of roles,
20 including by conducting physical surveillance and monitoring intercepted
21 communications. I have been directly involved in the review and deciphering of
22 intercepted coded conversations between narcotics traffickers that were later
23 corroborated by surveillance or by targets' statements. Throughout my law
24 enforcement career, I have spoken with, worked with, and gained knowledge from
25 numerous experienced federal, state, and local narcotics officers.

26 6. I have a bachelor's of science in computer science, which I received from
27 San Jose State University in 2002. During the course of obtaining this degree I
28 completed courses in network management. Additionally, I have complete college

1 level course work on computer forensics. During those courses I have learned about
 2 network layered architectures and the principles of network communications using
 3 various network protocols.

4 7. I have been assigned as a DEA technical agent since 2010, when I
 5 completed the DEA Basic Technical Course. As part my duties I have been involved in
 6 the searches of numerous cell phones and computers.

7 8. The facts in this affidavit come from my training, experience, and
 8 information obtained from other agents and witnesses.

9 9. The facts in this affidavit come from my personal observations, my
 10 training and experience, and information obtained from other agents and witnesses. My
 11 specialized training and experience in drug investigations form a basis for my opinions
 12 and conclusions, which I drew from the facts set forth. It also does not purport to state
 13 every fact known to law enforcement, but rather only to establish probable cause to
 14 conclude that ISRAEL PEREZ VILLANUEVA committed the charges set forth above.

15 **SUMMARY OF PROBABLE CAUSE¹**

16 Summary of Investigation

17 10. As explained further below, the United States, including the DEA, is
 18 conducting a criminal investigation regarding possible violations of Distribution of, and
 19 Possession with Intent to Distribute, Controlled Substances, in violation of 21 U.S.C.
 20 § 841(a)(1); Conspiracy to Distribute, and to Possess with the Intent to Distribute,
 21 Controlled Substances, in violation of 21 U.S.C. §§ 841(a)(1) and 846, in Skagit
 22 County, Whatcom County, and elsewhere. During the course of the investigation,
 23 investigators initially identified Enoc MARTINEZ LOPEZ as a primary source of
 24 supply of cocaine, and subsequently found him also to be a source of supply of
 25

26
 27 ¹ For ease of reading and to avoid repetition, this summary of probable cause is broken into sections describing
 28 different events, location sand vehicles. However, it is my intent that the affidavit be read as a whole, with the
 facts set forth in each section and subsection supporting probable cause for each the charges set forth in this
 Complaint.

1 fentanyl, methamphetamine, and heroin. By reviewing data obtained pursuant to state
2 and federal search warrants, investigators have learned that MARTINEZ LOPEZ and
3 his associates use cellular phones and various mobile applications to conduct their drug
4 distribution business. MARTINEZ LOPEZ has communicated about drug sales via the
5 application “Snapchat” and via his cellular provider’s Short Message Service (SMS), he
6 has collected money in exchange for drugs via the application “Cash App,” and has
7 stored photographs of drugs on his Google account. Individuals associated with ENOC
8 MARTINEZ LOPEZ who purchase controlled substances from him, or who redistribute
9 controlled substances for him, include: Manuel GARCIA MUNOZ, Casey LANDIS,
10 Adam WISNIEWSKI, and Jesse WITTEVEEN. Another individual, Corbin
11 SAUNDERS is a felon who was found in possession of two firearms during this
12 investigation.

13 April 18, 2022 Arrest of Adam WISNIEWSKI

14 11. On April 18, 2022, investigators were conducting surveillance of Enoc
15 MARTINEZ LOPEZ at the Silver Reef Casino in Whatcom County. Investigators
16 observed an individual, later identified as Adam WISNIEWSKI get into MARTINEZ
17 LOPEZ’s gray Toyota pickup truck (TV1). Investigators followed MARTINEZ
18 LOPEZ and WISNIEWSKI to a nearby gas station, where they remained a short
19 amount of time before returning the Silver Reef Casino. Investigators observed
20 WISNIEWSKI get out of the MARTINEZ LOPEZ’s pickup truck (TV1) and
21 MARTINEZ LOPEZ drive away from the area. A short while later, as WISNIEWSKI
22 was walking away from the Silver Reef Casino, investigators observed WISNIEWSKI
23 discard an object onto the ground. Investigators recovered this object which they
24 determined to be blue pills marked “M30,” which they believed to be fentanyl pills.
25 WISNIEWSKI was then arrested. During a search incident to arrest, investigators
26 recovered approximately 233 gross grams of suspected fentanyl pills, 68.75 gross grams
27
28

1 of fentanyl powder², which was purple in color and a firearm (Harrington & Richardson
2 [Heckler & Koch], Model HK4, serial number HR06139, firearm “e” in the list below)
3 amongst other items. WISNIEWSKI was released after the interview discussed below.

4 12. In a post Miranda statement, WISNIEWSKI told investigators that he had
5 met “V” earlier in the day and obtained 1,000 “blues” and a sample of fentanyl powder,
6 which was purple in color. Based on the investigation to date, investigators know that
7 MARTINEZ LOPEZ goes by “Victor” with some of his drug trafficking associates.
8 Based on training and experience, I know that “blues” is commonly used code for
9 fentanyl pills marked “M30.”

10 June 15, 2022 Controlled Purchase of Heroin from GARCIA MUNOZ

11 13. On June 15, 2022, a Whatcom County Drug and Gang Task Force
12 (WCDGTF) Confidential Source (CS5) ³ purchased approximately 56.60 gross grams
13 of heroin from Manuel GARCIA MUNOZ while meeting with GARCIA-MUNOZ in
14 GARCIA MUNOZ’s blue Honda Civic (TV3) in Skagit County. Prior to the controlled
15 buy, investigators searched CS5 and CS5’s vehicle for contraband and none was found.
16 CS5 was provided a concealed recording device and pre-recorded buy funds.
17 Investigators followed CS5 to the meeting location in Skagit County and CS5 was not
18 observed meeting with any other individuals prior to meeting with GARCIA MUNOZ.
19 After the meeting investigators followed CS5 to a pre-determined location, where
20 investigators where CS5 gave investigators approximately 56.60 gross grams of heroin
21 and the recording device.

22 _____
23 ² Due to its potency, potential for accidental exposure and other officer safety concerns, investigators do not
24 routinely field test fentanyl. In some select instances, investigators have the equipment necessary to safely field
25 test fentanyl and for those instances it is documented as such. When a seized substance has not been field tested
26 but is identified as fentanyl, this determination is based on the training and experience of the officer, the
27 appearance of the pills or powder in question, and the context of the seizure itself.

28 ³ CS5 has prior felony convictions for a controlled substance violations and attempting to elude. CS5 is working
in exchange for charges related to a recent State of Washington arrest not being filed. During a surveillance
conducted in October 2022, investigators observed the vehicle used by CS5 during this controlled purchase and
the controlled purchase on November 9, 2022 at a Bellingham residence that MARTINEZ LOPEZ was observed
at. Investigators did not see CS5 at that residence or in that vehicle during that October 2022 surveillance.

1 14. Agents conducted surveillance after the controlled meeting between CS5
2 and GARCIA MUNOZ, following TV3. Following the sale of heroin to CS5, GARCIA
3 MUNOZ drove TV3 went to two other public parking areas where the vehicle stayed
4 for approximately ten minutes at each location. Agents followed TV3 to a McDonald's
5 parking lot in Burlington, WA, where a white male adult wearing a red hat, driving a
6 silver BMW sedan, entered TV3's passenger side for less than one minute. After the
7 white male adult left TV3, and entered his silver BMW, TV3 left the McDonald's
8 parking lot and agents continued to follow it until it arrived and parked at GARCIA
9 MUNOZ's residence (Target Location 3).

10 June 23, 2022 Arrest of Adam WISNIEWSKI

11 15. On June 23, 2022, Everson Police Department, assisted by Whatcom
12 County Deputies, arrested WISNIEWSKI in Everson, Whatcom County. Found in
13 WISNIEWSKI's possession at the time of his arrest were two firearms (Sig Sauer,
14 Model P320 Carry, serial number 58B025078, firearm "c" in the list below, and a
15 Ruger, Model LC9S, serial number 329-54468, firearm "d" in the list below) and
16 approximately 60 gross grams of pills marked "M30," suspected to contain fentanyl. In
17 the vehicle at time of WISNIEWSKI's arrest was Jessica SWOPE. WISNIEWSKI
18 requested to speak with a Drug Task Force.

19 16. In a post Miranda statement, WISNIEWSKI provided information about
20 "V" or "Victor" who was a drug supplier. WISNIEWSKI showed investigators a
21 contact stored in his phone as "Big Dog V" with the phone number 360-982-8719
22 (TT10), which WISNIEWSKI said was for "Victor." As discussed above, investigators
23 believe "Victor" to be the MARTINEZ LOPEZ and MARTINEZ LOPEZ to be the user
24 of 360-982-8719 (TT10).

25 Search Warrant on Verizon Wireless accounts 360-982-8719 (TT10) and 206-573-2914

26 17. On August 12, 2022, US Magistrate Judge Brian A Tsuchida signed a
27 search warrant authorizing the search for records related to Verizon Wireless records
28 related to 360-982-8719 (TT10) and 206-573-2914, both believed to be used by Enoc

1 MARTINEZ LOPEZ. Investigators subsequently served this warrant on Verizon
2 wireless. On August 22, 2022, investigators received records from Verizon Wireless.
3 No SMS content was received for 206-573-2914. SMS content was received for 360-
4 982-8719 (TT10) and these messages ranged from June 30, 2022, through August 12,
5 2022, with several multi day gaps in between the records. Some of the messages
6 received pursuant to this search warrant are discussed in the sections below.

7 18. According to Verizon Wireless records, 360-982-8719 (TT10) is
8 subscribed to Vic MARTINEZ at 1628 North 26th Street, Mount Vernon, Washington
9 98273 with an activation date of May 16, 2022.

10 August 31, 2022 Controlled Purchase from MARTINEZ LOPEZ

11 19. On August 31, 2022, a Whatcom Gang and Drug Task Force (WGDTF)
12 Confidential Source (CS5) met with investigators to attempt to purchase 1,000 fentanyl
13 pills and one ounce of heroin from MARTINEZ LOPEZ. CS5 spoke to MARTINEZ
14 LOPEZ telephonically to arrange the controlled purchase. Investigators searched CS5
15 and CS5's vehicle for contraband and none was found. CS5 was provided \$2,150 in
16 pre-recorded buy funds. Investigators followed CS5 to the meeting location in
17 Whatcom County and CS5 was not observed meeting with any other individuals prior
18 to meeting with MARTINEZ LOPEZ. CS5 met with MARTINEZ LOPEZ who was
19 driving a black Lexus (WA/BSU8484) (Target Vehicle 5). After the meeting
20 investigators followed CS5 to a pre-determined location, where investigators were
21 given approximately 197 gross grams of suspected fentanyl pills and 55 gross grams of
22 suspected heroin from CS5. CS5 and CS5's vehicle were searched for contraband and
23 none was found.

24 Messages between MARTINEZ LOPEZ and WITTEVEEN (TT21)

25 20. According to toll analysis, MARTINEZ LOPEZ (TT10) had been in
26 contact with 360-603-1960 (TT21) used by Jesse WITTEVEEN approximately 144 times
27 between July 26, 2022, and August 19, 2022.
28

21. On July 30, 2022, MARINEZ LOPEZ (TT10) and the user of 360-603-1960 (TT21) exchanged the following messages:

7/30/2022 19:57	Incoming	3606031960	"Hey I want 2 of blue berry's boats and 1 of upper "
7/30/2022 20:20	Outgoing	3606031960	"Ok"
7/30/2022 20:58	Incoming	3606031960	"Where are we meeting at "
7/30/2022 20:59	Incoming	3606031960	"How long "
7/30/2022 21:20	Outgoing	3606031960	"Come to Marysville "
7/30/2022 21:29	Incoming	3606031960	"I was two off sorry"
7/30/2022 21:45	Incoming	3606031960	"Where are we meeting at "

22. Based on training and experience, I know that "blue berry" is commonly used code for "m30" pills, typically containing fentanyl, "boat" is commonly used code for 1,000 pills and "upper" is likely code for some sort of stimulant, possibly cocaine or methamphetamine. In this conversation, investigators believe that MARTINEZ LOPEZ and the user of 360-603-1960 (TT21) ultimately meet for MARTINEZ LOPEZ to provide 2,000 fentanyl pills and 1 unit of some type of drug to the user of 360-603-1960 (TT21).

23. On August 1 and 2, 2022, MARINEZ LOPEZ (TT10) and the user of 360-603-1960 (TT21) exchanged the following messages:

8/1/2022 22:13	Incoming	3606031960	"I'm ready with 10"
8/1/2022 22:16	Outgoing	3606031960	"Ok I'm in burlington"
8/1/2022 22:20	Incoming	3606031960	"I'm on my way "
8/1/2022 22:40	Incoming	3606031960	"And can I use a duffle bag "
8/1/2022 22:40	Incoming	3606031960	"I forgot mine "
8/1/2022 22:40	Outgoing	3606031960	"Give me 30 min bro I'm coming down from the mountains "
8/1/2022 22:41	Incoming	3606031960	"OK I just am leaving bham"
8/1/2022 23:05	Incoming	3606031960	" What's up home "
8/1/2022 23:05	Incoming	3606031960	"Homie"
8/1/2022 23:06	Incoming	3606031960	"Where am I going "
8/1/2022 23:07	Outgoing	3606031960	"Mount vernon"
8/1/2022 23:07	Incoming	3606031960	"OK where "
8/1/2022 23:14	Outgoing	3606031960	"Same apartments bro "
8/1/2022 23:14	Outgoing	3606031960	"1521 n 26th st "
8/1/2022 23:14	Incoming	3606031960	"In Burlington "
8/1/2022 23:58	Outgoing	3606031960	"Counted 9,475"

8/1/2022 23:58	Incoming	3606031960	"Really "
8/1/2022 23:58	Incoming	3606031960	"Can't be "
8/1/2022 23:59	Outgoing	3606031960	"It is 1125 added to the bill"
8/2/2022 0:01	Outgoing	3606031960	"2,025 last bill + 1,125= 3150 new bill"

24. Based on training and experience, I believe that "10" is reference to \$10,000 that the user of 360-603-1960 (TT21) is going to provide to MARTINEZ LOPEZ for the purchases of obtaining drugs. Based on the conversation, investigators believe that the two individuals met and the user of 360-603-1960 (TT21) provided MARTINEZ LOPEZ \$9,475, was provided an unknown quantity of drugs and owed MARTINEZ LOPEZ \$3,150 for drugs provided to the user of 360-603-1960 (TT21)

25. On August 12, 2022, MARINEZ LOPEZ (TT10) and the user of 360-603-1960 (TT21) exchanged the following messages:

8/12/2022 20:40	Outgoing	3606031960	"10 min away"
8/12/2022 20:54	Incoming	3606031960	"Hey you dump truck i got 1200 more so 5100 i need three boats and one p of other"
8/12/2022 20:55	Outgoing	3606031960	"I'm pulling up"

26. Based on training and experience, I believe that the user of 360-603-1960 (TT21) told MARTINEZ LOPEZ that they had \$5,100 for MARTINEZ LOPEZ and wanted 3,000 fentanyl pills and one "p," likely one pound, of another type of drug.

27. In October 2022, investigators recognized that WITTEVEEN stopped using TT21 and identified 360-660-4383 as WITTEVEEN's new number. On October 11, 2022, a Whatcom County Superior Court Judge approved a search warrant and court order authorizing investigators to obtain location information for WITTEVEEN's 360-660-4383. Investigators served the warrant and began receiving information shortly thereafter.

November 1 & 2, 2022 Surveillance of MARTINEZ LOPEZ and Jesse WITTEVEEN and recovery of 959 gross grams of methamphetamine and 346 gross grams of suspected fentanyl pills discarded by WITTEVEEN.

28. On November 1, 2022, investigators conducted surveillance on MARTINEZ LOPEZ. Investigators observed that MARTINEZ LOPEZ was driving his white BMW (TV4). Investigators followed MARTINEZ LOPEZ from his residence in

1 Marysville, Washington to a business parking lot in Marysville, Washington where
2 investigators observed MARTINEZ LOPEZ meet with the occupant of another vehicle
3 for a short period of time, discussed below. Based on training and experience,
4 investigators believe that this was a drug transaction conducted by MARTINEZ
5 LOPEZ. Investigators observed MARTINEZ LOPEZ's white BMW (TV4) drive away
6 from the parking lot, investigators did not follow the white BMW (TV4). A short while
7 later, investigators observed the white BMW parked in front of 18111 25th Avenue
8 Northeast, Apartment FF105, Marysville, Washington (Target Location 3). Based on
9 this investigation, investigators know that MARTINEZ LOPEZ frequents this address
10 before and after drug transactions.

11 29. Investigators observed MARTINEZ LOPEZ's white BMW (TV4) depart
12 the area of Apartment FF105 (Target Location 3) and drive toward Mount Vernon,
13 Washington. Investigators followed MARTINEZ LOPEZ's white BMW to several
14 locations in Mount Vernon, Washington before temporarily losing sight of MARTINEZ
15 LOPEZ's white BMW (TV4).

16 30. In the afternoon of November 1, 2022, Jesse WITTEVEEN's phone was
17 not providing court authorized location information. At approximately 9:05 PM,
18 investigators began receiving information for WITTEVEEN's phone and it was located
19 in the area of 8363 Holly Lane, Maple Falls, Washington (Target Location 1).

20 31. At approximately 10:05 PM, location data for WITTEVEEN's phone
21 indicated that WITTEVEEN had left the area of Target Location 1. Location data for
22 WITTEVEEN's phone later indicated that WITTEVEEN was in the area of Walmart in
23 Mount Vernon Washington. Investigators search the area parking lots for vehicle
24 known to be used by WITTEVEEN. Investigators observed a maroon Nissan Murano
25 (Target Vehicle 8) in the Walmart parking lot and saw a male wearing a flat brimmed
26 hat and female get into and start the Nissan Murano (Target Vehicle 8). Investigators
27 then observed a white Honda sedan park next to the Nissan Murano and female get out
28 of the white Honda and get into the rear passenger seat of the Nissan Murano. At

1 approximately 10:51 PM, investigators observed both vehicles drive out of the parking
2 lot and shortly thereafter observed that location data for WITTEVEN's phone was
3 travelling with the two vehicles. Investigators observed both vehicles eventually split
4 up and investigators continued to follow to Nissan Murano (Target Vehicle 8).

5 32. Investigators followed the Nissan Murano (Target Vehicle 8) until it
6 parked in the parking lot of an apartment complex in Mount Vernon, Washington.
7 Investigators relocated MARTINEZ LOPEZ's white BMW (TV4) in Mount Vernon,
8 Washington, and followed it until approximately 11:25 PM, when investigators
9 observed it park at an apartment complex near where the Nissan Murano (Target
10 Vehicle 8) parked. A short time later, investigators observed the Nissan Murano
11 (Target Vehicle 8) drive toward MARTINEZ LOPEZ's white BMW (TV4).
12 Investigators then observed the Nissan Murano (Target Vehicle 8) parked near
13 MARTINEZ LOPEZ's white BMW. Investigators saw MARTINEZ LOPEZ standing
14 near the Nissan Murano (Target Vehicle 8) near a male who was wearing a flat brim
15 hat.

16 33. At approximately 11:35 PM, investigators observed MARTINEZ
17 LOPEZ's white BMW (TV4) drive away from the apartment complex parking lot
18 followed shortly by the Nissan Murano (Target Vehicle 8). Investigators followed the
19 Nissan Murano (Target Vehicle 8) to a nearby gas station where investigators observed
20 the white Honda pull in and park near the Nissan Murano (Target Vehicle 8).
21 Investigators positively identified the male from the Nissan Murano (Target Vehicle 8)
22 as Jesse WITTEVEEN via a booking photograph. Investigators observed both vehicles
23 drive away from the gas station in tandem. Investigators followed both vehicles and
24 observed both vehicles stop on the side of the road and reverse direction of travel, drive
25 in a direction opposite their ultimate destination and drive significantly below the
26 posted speed limit. Based on training and experience, I know that driving in this
27 manner is consistent with conducting counter surveillance attempting to identify law
28 enforcement surveillance units. The vehicles eventually split up and investigators

1 continued to follow the Nissan Murano (Target Vehicle 8) into Sedro Woolley,
2 Washington where it stopped at a gas station. Investigators observed the Nissan
3 Murano leave the gas station, drive into and stop on the side of the road in a
4 neighborhood. Investigators lost sight of the Nissan Murano (Target Vehicle 8) as it
5 drove north on Highway 9 toward Maple Falls, Washington. Investigators believe that
6 the Nissan Murano was driving at a high rate of speed as investigators were unable to
7 catch up to the Nissan Murano (Target Vehicle 8).

8 34. Sometime later, Whatcom County Deputies located the Nissan Murano
9 (Target Vehicle 8) as it drove through Van Zandt, Washington. The most direct route
10 between Sedro Woolley and Van Zandt is to drive north on Highway 9. Deputies
11 attempted to stop the Nissan Murano (Target Vehicle 8) and it did not stop. In an
12 attempt to stop the vehicle, deputies successfully deployed spike strips and the vehicle
13 continued to drive for several miles before the vehicle was ultimately stopped. While
14 deputies were attempting to stop the Nissan Murano (Target Vehicle 8), deputies
15 observed a white bag being thrown out of the passenger side window of the vehicle.
16 This occurred within Whatcom County. Deputies recovered a white bag from the
17 approximate location where deputies observed the bag being thrown out of the Nissan
18 Murano (Target Vehicle 8) window. This bag was found to contain approximately 959
19 gross grams of methamphetamine, which field-tested positive for the presence of
20 methamphetamine and 346 gross grams of fentanyl pills. The driver of the vehicle was
21 identified as Jesse WITTEVEEN and the passenger was identified as Jennifer
22 MCCOSKEY. Both WITTEVEEN and MCCOSKEY were booked into Whatcom
23 County jail. The Nissan Murano (Target Vehicle 8) was towed to Whatcom County
24 Sheriff's Office facility and secured pending a search warrant.

25 November 3, 2022 Search of WITTEVEN's Vehicle and Residence; seizure of 138
26 gross grams of fentanyl pills and approximately 174 gross grams of methamphetamine

27 35. On November 3, 2022, US Magistrate Judge Paula McCandlis signed a
28 search warrant authorizing the search of WITTEVEN's vehicle and residence.

1 36. On November 3, 2022, investigators executed the search warrant on
 2 WITTEVEN's vehicle. In a safe on the front passenger floorboard, investigators found
 3 approximately 138 gross grams of suspected fentanyl pills and approximately 174 gross
 4 grams of suspected methamphetamine. Multiple cell phones and various ammunition
 5 was also found in the vehicle.

6 37. On November 4, 2022, investigators executed the search warrant at
 7 WITTEVEN's residence. At the residence, investigators found approximately 35 gross
 8 grams of suspected methamphetamine, multiple cell phones, miscellaneous firearm
 9 parts and a significant quantity of ammunition.

10 November 9, 2022 Controlled Purchase of 170 gross grams of suspected fentanyl pills
 11 from MARTINEZ LOPEZ

12 38. On November 9, 2022, CS5 met with investigators to attempt to purchase
 13 1,000 fentanyl pills from MARTINEZ LOPEZ. Investigators searched CS5 and CS5's
 14 vehicle for contraband and none was found. CS5 was provided a concealed recording
 15 device and \$1,400 in pre-recorded buy funds. CS5 spoke to MARTINEZ LOPEZ on
 16 360-982-8719 (TT10). Investigators followed CS5 to the meeting location in Skagit
 17 County and CS5 was not observed meeting with any other individuals prior to meeting
 18 with MARTINEZ LOPEZ⁴. CS5 met with MARTINEZ LOPEZ who was driving a
 19 white Mercedes (WA/CEX6393) (Target Vehicle 9). After the meeting investigators
 20 followed CS5 to a pre-determined location, where investigators got approximately 170
 21 gross grams of fentanyl pills and the recording devices from CS5. CS5 and CS5's
 22 vehicle were search for contraband and none was found.

23 November 2, 2022 Stop of Corbin SAUNDERS; seizure of 4.7 gross grams of
 24 methamphetamine, 14.2 gross grams of methamphetamine, 24.9 gross grams of
 25 cocaine, an AR15 style rifle and a handgun from his vehicle.

26 39. On November 2, 2022, investigators conducted surveillance on 2100
 27 Halleck Street, Bellingham, Washington (Target Location 8), a suspected location from
 28

⁴ CS5 used the restroom in an area business and was observed by investigators while doing so.

1 which controlled substances were being sold by GUNDERSON a known narcotics
2 dealer. GUNDERSON's criminal history indicates he has a 2011 felony drug
3 trafficking conviction and a 2019 felony drug trafficking conviction. At approximately
4 9:50 PM, investigators observed an individual, who appeared to be a male adult, walk
5 out of Target Location 8 (TL8), and toward a vehicle later identified as a Tesla.
6 Investigators observed lights activated on the Tesla, and then observed the Tesla drive
7 away and noted the license plate as WA/CEE7989. According to the Washington
8 Department of Licensing, WA/CEE7989 is a blue 2018 Tesla Model 3 registered to
9 Corbin SAUNDERS at 15512 Forty Five Road, Arlington, Washington. Investigators
10 had been conducting hours of surveillance at TL8 and noted short stay traffic at this
11 residence as described earlier in this affidavit. Based on training and experience I know
12 that short stay traffic, such as that described above, is consistent with drug trafficking.
13 Based on their training and experience, investigators believed that the person driving
14 the Tesla was likely involved in a narcotics transaction with GUNDERSON and/or
15 persons inside of TL8.

16 40. Investigators followed the Tesla a short way before it was stopped, within
17 Whatcom County, by uniformed deputies in a marked patrol car. Deputies identified
18 the driver as Corbin SAUNDERS and the passenger as Justy DAVIDSON.
19 SAUNDERS denied consent to search the vehicle. A narcotics detecting K9 alerted to
20 the presence of the odor of narcotics emanating from the vehicle. Deputies seized the
21 vehicle pending the application of a search warrant. SAUNDERS and DAVIDSON
22 were read their Miranda rights. Neither SUANDER nor DAVIDSON provided any
23 statements regarding the source of the drugs that would be later found in the vehicle,
24 described below. SAUNDERS and DAVIDSON were released from the scene.
25 According to NCIC, SAUNDERS a 2007 felony conviction for Malicious Mischief, a
26 2008 felony conviction for Assault, a 2010 felony conviction for a controlled substance
27 violation, a 2018 felony conviction for Possession of a Stolen Vehicle, a 2019 felony
28 convictions for Identity Theft, Bail Jumping and a controlled substance violation

1 41. On November 3, 2022, a Whatcom County Superior Court Commissioner
2 authorized a search warrant of the Tesla Model 3. On the same day, deputies contacted
3 SAUNDERS and sent him a photograph of the approved search warrant. SAUNDERS
4 remotely unlocked the doors and trunk of the Tesla Model 3. During the search of the
5 vehicle deputies located 4.7 gross grams of suspected methamphetamine from the
6 passenger door and a women's purse which contained 14.2 gross grams of suspected
7 methamphetamine and 24.9 gross grams of suspected cocaine. Also located in the
8 purse was multiple items of dominion and control for DAVIDSON. Located in the
9 center console cup holder was a digital scale with suspected drug residue. Deputies
10 located a purse in the backseat which contained 45.2 gross grams of suspected
11 methamphetamine, 1.4 gross grams of suspected heroin and additional suspected
12 controlled substances.

13 42. During a search of the trunk of the Tesla Model 3, deputies located an
14 AR-15 style rifle (KE Arms, Model KP-15, serial number KM05791, firearm "a" in the
15 list below). No magazines were found in the trunk of the vehicle. Deputies were
16 initially unable to unlock the glove box of the Tesla Model 3. Deputies contacted
17 SAUNDERS again who eventually gave them the "pin" number to unlock the glove
18 box. Inside the glove box deputies located two rifle magazine which contained
19 ammunition compatible with the rifle found in the trunk and a 9mm handgun (Canik,
20 Model TP9 Elite Combat, serial number BN05248, firearm "b" in the list below) which
21 was loaded with a round in the chamber and a magazine which contained four more
22 rounds. Neither firearm was listed as stolen.

23 Messages between MARTINEZ LOPEZ and CASEY LANDIS (TT23)

24 43. According to Verizon Wireless records, no subscriber information is
25 provided for 360-303-3643 (TT23); however, an activation date for April 6, 2021, was
26 listed. According to a toll analysis, MARTINEZ LOPEZ (TT10) has been in contact
27 with 360-303-3643 (TT23) approximately 540 times between June 10, 2022, and
28 October 10, 2022.

44. According to a search of a law enforcement database, 360-303-3643 (TT23) is used by Casey LANDIS. Investigators suspect that this phone is used by Casey LANDIS.

45. On August 2, 2022, MARTINEZ LOPEZ (TT10) and 360-303-3643 (TT23) exchanged the following messages:

8/2/2022 18:43	Incoming	3603033643	"Hey bud, just checking in with you. \nAre you planning on coming to B'ham today/tonight by any chance?"
8/2/2022 18:54	Outgoing	3603033643	"Yea I am what u need "
8/2/2022 18:56	Incoming	3603033643	"Perfect, I'll be at my place. You can swing by whenever you want. \nI'm needing 2 boats. "
8/2/2022 20:39	Outgoing	3603033643	"U home there in 10 min"
8/2/2022 20:43	Incoming	3603033643	"Ten min. \nOk"
8/2/2022 20:43	Outgoing	3603033643	"Cool"
8/2/2022 20:54	Outgoing	3603033643	"Here"
8/2/2022 20:55	Incoming	3603033643	"I'm on the porch. \nCome on up"

46. Based on my training and experience, I know that the term “boat” is common code for a quantity of pills. Specifically, in this investigation, “boat” is common code for 1000 pills or tablets, likely “M30” fentanyl pills. Based on these messages, investigators believe that MARTINEZ LOPEZ met the user of 360-303-3643 (TT23) at their residence in Bellingham Washington to distribute 2000 “M30” fentanyl pills.

47. On August 10, 2022, MARTINEZ LOPEZ and 360-303-3643 (TT23) exchanged the following messages:

8/10/2022 14:23	Incoming	3603033643	"Hey bud, are you coming to B'ham today?"
8/10/2022 14:25	Outgoing	3603033643	" Yes I am like 5pm I should be there"
8/10/2022 14:36	Incoming	3603033643	"Cool, cool!\nI am looking for two boats, and one coke. "
8/10/2022 14:47	Outgoing	3603033643	"Ok"
8/10/2022 17:59	Outgoing	3603033643	"On my way "
8/10/2022 18:04	Incoming	3603033643	"How long till you're here?\nI want to clear out the house "
8/10/2022 18:08	Outgoing	3603033643	"40 min"
8/10/2022 18:08	Outgoing	3603033643	"40 to an hour"

1	8/10/2022 18:54	Outgoing	3603033643	"What up bro I'm in bham "
2	8/10/2022 19:13	Incoming	3603033643	"Hey...wanna come over "
3	8/10/2022 19:19	Outgoing	3603033643	"Yes let me fining lummi first cane here wasn't sure if u were ready "
4	8/10/2022 19:21	Incoming	3603033643	"Would the silver reef casino be a better place to meet?"
5	8/10/2022 19:23	Outgoing	3603033643	"U coming here"
6	8/10/2022 19:23	Outgoing	3603033643	"??"
7	8/10/2022 19:24	Incoming	3603033643	"I was waiting for you at my house, then was going to go to the casino. \nSo we could either meet there in 30min. Or we could meet at my place "
8	8/10/2022 19:27	Outgoing	3603033643	"Come to casino then "
9	8/10/2022 19:28	Incoming	3603033643	"Ok"
10	8/10/2022 20:19	Outgoing	3603033643	"U at. the casino"
11	8/10/2022 20:19	Outgoing	3603033643	"I'm 2 min away"
12	8/10/2022 20:21	Incoming	3603033643	"Fuck bro, my ride is just picking me up. They were late. (Fuckin girls)\nSo just come here if you don't mind"
13	8/10/2022 20:21	Outgoing	3603033643	"Yup I'm going "
14	8/10/2022 20:22	Outgoing	3603033643	"No problem on my way"
15	8/10/2022 20:23	Incoming	3603033643	"Thanks homie. I'm here at the house ready for ya"
16	8/10/2022 20:29	Outgoing	3603033643	"Ok"
17	8/10/2022 20:40	Outgoing	3603033643	"Getting off exit"
18	8/10/2022 20:41	Incoming	3603033643	"Kk"
19	8/10/2022 20:44	Outgoing	3603033643	"Here"

48. Based on training and experience, I know that “coke” is commonly used terminology for cocaine and, as previously stated above, “boat” is common code for 1000 “M30” fentanyl pills. Based on these messages investigators believe that MARTINEZ LOPEZ met the user of 360-303-3643 (TT23) to provide them with 2000 “M30” fentanyl pills and one quantity of cocaine.

October 11, 2022 Seizure of drugs from Casey LANDIS

49. Investigators obtained and reviewed Silver Reef Casino (Whatcom County) surveillance video of events that occurred on October 11, 2022. In this video, at approximately 8:38 PM, a male, whose appearance matches that of Casey LANDIS, appears to access a fanny pack and remove some money. LANDIS and a female, identified as Dannielle FREDRICKS, then appear to pay for an item at the cash register.

1 At approximately 8:40 PM, LANDIS and the female walk away from the cash register
2 and leave the fanny pack on the counter. Multiple customers walk up to the cash
3 register to purchase items and no one is observed interacting with the fanny pack.

4 50. At approximately 9:03 PM, an individual is observed mentioning the
5 fanny pack to a casino employee who takes possession of the fanny pack. The fanny
6 pack is placed on the cashier's side of the counter before another casino employee takes
7 custody of the fanny pack. Silver Reef Casino security conducted a routine lost and
8 found inventory of the fanny pack and located suspected controlled substances. The
9 controlled substances in the fanny pack were seized by Lummi Police Department.

10 51. A Lummi Police Department officer responded to the casino and located
11 the female and male depicted in the video. The officers detained LANDIS and read
12 LANDIS his Miranda Rights. When asked for identification, LANDIS provided an
13 identification for another individual. LANDIS was subsequently taken into custody for
14 criminal impersonation. LANDIS subsequently provided his name and date of birth,
15 officers confirmed LANDIS's identity based on that information.

16 52. During a search of LANDIS's person, officers located a small plastic
17 baggie containing approximately 20 "M30" pills, consistent with fentanyl pills
18 frequently seized in Whatcom County. A cell phone was also seized from LANDIS.

19 53. The fanny pack was determined to contain approximately 541 gross
20 grams of suspected fentanyl pills 332.65 gross grams of suspected methamphetamine
21 and 44.4 gross grams of suspected fentanyl powder. The suspected methamphetamine
22 and suspected fentanyl both presumptively tested positive, using a non-contact
23 handheld drug detection device, for the presence of methamphetamine and fentanyl,
24 respectively.

25 Search of LANDIS's phone

26 54. On October 31, 2022, US Magistrate Judge Brian Tsuchida signed a
27 search warrant authorizing the search LANDIS's cell phone.
28

55. Investigators identified that the phone was assigned phone number 360-303-3643 (TT23). Investigators located numerous messages related to LANDIS's residence and drug trafficking, some of those messages are discussed below.

56. On March 8, 2022, LANDIS exchanged the following messages with 360-499-5424, saved in his phone as "Kody."

3604995424	Kody	Incoming	Hit me up we have the money destiny owes you and shit
3604995424	Kody	Outgoing	Right on.sorry phone was dead. I'm around
3604995424	Kody	Incoming	Where you at?
3604995424	Kody	Outgoing	1512 Iron street
3604995424	Kody	Outgoing	One block east (towards the freeway from Nelson's Market) and one block north (towards king street McDonald's) Hit me up when you get to the stop sign at Iron and Gladstone
3604995424	Kody	Incoming	Ok
3604995424	Kody		MESSAGES SKIPPED FOR BREVITY
3604995424	Kody	Incoming	Do you want me to stay here or keep walking towards where you're at?
3604995424	Kody	Outgoing	Ok...coming out How much money do you have
3604995424	Kody	Incoming	I'll give you \$150 total so we owe you \$42 and then \$108 for you know
3604995424	Kody	Outgoing	Ok...word. Just bagging it up. In two minutes, go ahead and walk east one block to where the road ends.
3604995424	Kody	Incoming	K
3604995424	Kody	Incoming	Hey sorry can I just buy another \$100 worth while I'm here sorry bro
3604995424	Kody	Outgoing	Right now??
3604995424	Kody	Incoming	I already know I'll have to come back after I give destiny some and Dave and shit
3604995424	Kody	Incoming	If you can. Or I can come back later
3604995424	Kody	Outgoing	Sure...I'll be right back

57. In these messages, LANDIS provides "1512 Iron Street" (Target Location 9) as his address. Additionally, LANDIS and "Kody" discuss money that is owed to LANDIS. Based on training and experience I believe in these messages that when

1 “Kody” said “Hey sorry can I just buy another \$100 worthwhile I'm here sorry bro”
2 they were referring to obtaining an additional quantity of drugs.

3 58. On March 13 and 14, 2022, LANDIS exchanged the following messages
4 with 360-770-9942, saved in his phone as “Tommy.”

5	3607709942	Tommy	Incoming	Will you give me that deal for a half roll?? Fifty at 225?
6	3607709942	Tommy	Outgoing	Yeah I can do that
7				MESSAGES SKIPPED FOR BREVITY
8	3607709942	Tommy	Outgoing	Come on through
9	3607709942	Tommy	Incoming	Come through where?
10	3607709942	Tommy	Outgoing	Off lakeway. 1512 iron street

11 59. Based on training and experience I know that “roll” is commonly used
12 code for one hundred pills and a “half roll” would be 50 pills.

13 60. On July 24, 2022, LANDIS and GUNDERSON exchanged the following
14 messages.

15	3607390044	Anthony	Outgoing	I wanna buy some powder from you. Can you facilitate that?
16	3607390044	Anthony	Incoming	Which kind
17	3607390044	Anthony	Outgoing	Honestly I like both
18				I've had good purp and I've had good gray. I usually like purple. I would like a b for sure if you can do that. Thanks bud. Let me know
19	3607390044	Anthony	Outgoing	
20	3607390044	Anthony	Incoming	Okay
21	3607390044	Anthony	Incoming	I got either one

22 61. Based on training and experience, I believe that “powder” is code for
23 fentanyl powder and “purple” is code for purple colored fentanyl powder, like that
24 investigators seized from WISNIEWSKI, as discussed above.

25 62. On July 24, 2022, LANDIS exchanged the following messages with 360-
26 577-7977, saved in his phone as “Tyson (erin's friend).”

27	3605777977	Tyson (erin's friend)	Outgoing	I wanted to buy a g or two of the fatty powder, and I also have some business ventures I would like to discuss with you
28				MESSAGES SKIPPED FOR BREVITY

1	3605777977	Tyson (erin's friend)	Outgoing	Yes that's ok but I live off lakeway now
2	3605777977	Tyson (erin's friend)	Incoming	Oh u didn't say that bro wth. So where do I go
3				Sorry, You never said you were coming. Get on freeway going north. Get off on the lakeway exit
4	3605777977	Tyson (erin's friend)	Outgoing	Go straight at the stop sign after you exit. Then take next left onto Lincoln. Follow the road underneath the overpass until a 4-way stop. Go straight. Take left onto iron street. I live like 3 blocks up on iron street. 1215 iron street. I'll be outside when you get here to make it easier.
5				Btw...I'll toss a little gas money in as an apology for wasting your gas.
6	3605777977	Tyson (erin's friend)	Outgoing	
7	3605777977	Tyson (erin's friend)	Incoming	Ok where do I park bro
8				I'm sitting in the front yard, you can park in front of me, behind a gold van
9	3605777977	Tyson (erin's friend)	Outgoing	Shit...it's 1512 Iron street

14 63. Based on training and experience I know that “fetty powder” is
 15 commonly used code for fentanyl powder and I believe that in these messages LANDIS
 16 is attempting to purchase fentanyl powder from “Tyson.”

17 64. On September 14, 2022, LANDIS sent the following message to
 18 “Brandon”

19				I'll hit you back in a few minutes. I just met victor, and I brought your name up. He's ok with working with you directly if you want to.
20	3602246942	Brandon	Outgoing	

21 65. In these messages, LANDIS discussed meeting with “Victor.” As
 22 discussed above, investigators know that MARTINEZ LOPEZ uses the name “Victor”
 23 with his drug trafficking associates.

24 66. On July 28, 2022, LANDIS exchanged the following messages with 360-
 25 919-9666 (TT15), saved in his phone as “Amy Hammer”. As discussed above,
 26 investigators believe that 360-919-9666 is used by Amy HAMNER, a suspected drug
 27 redistributor for MARTINEZ LOPEZ.
 28

3609199666	Amy Hammer	Incoming	How are you? Where you staying now? I need to see you
3609199666	Amy Hammer	Incoming	??
			I'm at same place for one more week.
3609199666	Amy Hammer	Outgoing	I'm good Victor is on his way to meet me rn
3609199666	Amy Hammer	Incoming	Ok cool. I might just actually get them from him then cuz I need to see him as well. Thanks budd

67. As discussed above, investigators believe that “Victor” is the name used by MARTINEZ LOPEZ with his drug trafficking associates. In these messages HAMNER appears to confirm that she is an associate of MARTINEZ LOPEZ as well as LANDIS.

68. On October 10 and 11, 2022, LANDIS exchanged the following messages with 360-982-8719 (TT10), saved in LANDIS’s phone as “Victor.” Investigators believe that MARTINEZ LOPEZ uses the name “Victor” with his drug trafficking associates. Additionally, investigators believe that MARTINEZ LOPEZ is the user of TT10.

3609828719	Victor	Outgoing	Hey bud... I know it's a little bit later than normal, but do you happen to be in B'ham by any chance??
			I picked those two things up from you yesterday, but Supposedly there's a guy coming to meet me who wants to buy them both. That would mean I would need to hook up with you afterwards. I'm trying to find out exactly when he's going to be here. Then I'll know what I need to do with you. How much longer do you plan on being in B'ham??
3609828719	Victor	Outgoing	
3609828719	Victor	Incoming	Yea I am what's up
3609828719	Victor	Incoming	Probably like 1130
3609828719	Victor	Incoming	Then I'm leaving
3609828719	Victor	Outgoing	Perfect. Before you leave would you HMU?
3609828719	Victor	Incoming	Yup
3609828719	Victor	Outgoing	thanks bro

1				Worst case I'll just drop it off before u
2				leave so u not empty and pay me
3	3609828719	Victor	Incoming	tomorrow if that guy still hasn't showed
4	3609828719	Victor	Incoming	up
5				I know ppl say a time then they slack for a
6				bit
7	3609828719	Victor	Outgoing	Yeah! Cool bro.
8	3609828719	Victor	Incoming	Not a problem.
9	3609828719	Victor	Incoming	That would be a good help.
10				Talk to you soon
11				M
12				Ok
13				No Sooo...I'm going to be needing to see
14				you ASAP. Need clear and powder mostly.
15				That meeting I told you about just took
16	3609828719	Victor	Outgoing	place and it was a robbery.
17	3609828719	Victor	Incoming	They got a lot of stuff. Like \$2000, 20g
18				powder, two pistols, 2 oz clear, 40g of
19				gold, and a shit-ton of gift cards.
20				On a positive note...I saved all three boats,
21				and I still have \$12000.
22				So I'm going to be fine. But definitely need
23				more of the powder ASAP. Clear too.
24				Oh yeah... I chased after them, and I
25	3609828719	Victor	Outgoing	slipped in the dog shit. FUCK MY LIFE
26	3609828719	Victor	Incoming	Yes I am
27				Perfect!!
28	3609828719	Victor	Outgoing	You have any idea of an ETA?
	3609828719	Victor	Incoming	We believe it was Gary Artima
				Who robbed u
				Hey bro...are you coming to B'ham today?
	3609828719	Victor	Outgoing	Let me know. I'm going to pick up money
	3609828719	Victor	Outgoing	right now
	3609828719	Victor	Outgoing	Hey bud...are you here yet?
	3609828719	Victor	Incoming	Yes
	3609828719	Victor	Incoming	I'm in town
				Sweet!
				Wanna meet me at my place?
	3609828719	Victor	Outgoing	(I paid a blue to have the shit cleaned off
	3609828719	Victor	Incoming	the sidewalk!)
	3609828719	Victor	Incoming	I'll be there at 10
	3609828719	Victor	Incoming	Lol ok
	3609828719	Victor	Outgoing	

3609828719	Victor	Incoming	Going to u now
3609828719	Victor	Outgoing	Cool I'm there and the doors open for ya
3609828719	Victor	Incoming	K

69. Based on training and experience, I know that powder, is commonly used code for fentanyl powder, clear is commonly used code for methamphetamine, blue is commonly used code for fentanyl pill and boats is commonly used code for 1,000 pills, in this case likely fentanyl pills. When LANDIS said “I saved all three boats,” I believe that LANDIS told MARTINEZ LOPEZ that he still had 3,000 fentanyl pills. When LANDIS said “Need clear and powder mostly” I believe that LANDIS was requesting methamphetamine and fentanyl powder from MARTINEZ LOPEZ. As discussed above, on October 11, 2022, Lummi Police Department recovered approximately 2499 suspected fentanyl pills, 183.3 gross grams of suspected methamphetamine and 19.7 gross grams of suspected fentanyl from a fanny pack abandoned by LANDIS. These drug quantities are consistent with the quantities and drug types discussed with MARTINEZ LOPEZ in the messages above.

70. Investigators located a video with a created date of September 21, 2022, that shows multi-color pills and blue pills, both which are consistent in appearance to fentanyl pills seized by investigators in this and other investigations. This video had a recorded coordinates of 48.7497, -122.4663. According to Google Maps, these coordinate are approximately at **Target Location 9**. Investigators also observed multiple photographs of firearms with location information at or near **Target Location 9**. According to NCIC, LANDIS has prior felony convictions which would make him ineligible to possess a firearm.

Messages between MARTINEZ LOPEZ and the user of TT13

71. According to T-Mobile records, no subscriber information is provided for 360-410-3572 (TT13); however, an activation date for June 26, 2022, was listed. According to a toll analysis, MARTINEZ LOPEZ (TT10) has been in contact with 360-410-3572 (TT13) approximately 206 times between July 8, 2022, and August 21, 2022.

72. On July 29, 2022, MARTINEZ LOPEZ (TT10) and 360-410-3572 (TT13) exchanged the following messages:

7/29/2022 22:40	Incoming	3604103572	"Yo Bell I just gave you too much 825 is too much for what you gave me I got a q and a q that's not enough"
7/29/2022 22:40	Incoming	3604103572	"Even with the hamper that's still not 825 bro"
7/29/2022 22:44	Incoming	3604103572	"Coolio"
7/29/2022 22:49	Outgoing	3604103572	"Ok"
7/29/2022 22:49	Outgoing	3604103572	"I'm confused"
7/29/2022 22:53	Outgoing	3604103572	"Ok I Gave u half and half"
7/29/2022 23:41	Incoming	3604103572	"Okay I'm going to breathe for a second and reevaluate what I just said in the numbers and I'll hit you back here in 15 okay sorry about that"
7/29/2022 23:50	Incoming	3604103572	"So am I doing like his head I'm going to sit down eat some food and I'll throw you something a text message later"

73. Based on training and experience, in this conversation I believe that the user of 360-410-3572 (TT13) paid MARTINEZ LOPEZ \$850 for two half, possibly ounces, of a two different types of drugs and the user of 360-410-3572 (TT13) was uncertain of what they received and thought they over paid.

74. On August 2, 2022, MARTINEZ LOPEZ (TT10) and 360-410-3572 (TT13) exchanged the following messages:

8/2/2022 20:07	Incoming	3604103572	"Hey bro what up if you're coming up tonight be cool if I could see you. Let me know"
8/2/2022 20:08	Incoming	3604103572	"I'll let you know"
8/2/2022 20:08	Outgoing	3604103572	"Ok"
8/2/2022 20:09	Incoming	3604103572	"Either Alabama area or possibly out in everson, sumas area q"
8/2/2022 20:20	Outgoing	3604103572	"Ok u want a full of your kind or same as last time Lil bit"
8/2/2022 20:54	Incoming	3604103572	"Other "
8/2/2022 21:00	Outgoing	3604103572	"Ok u ready"
8/2/2022 21:14	Incoming	3604103572	"Just bout just getting dressed. Where we going or u wanna swoop "
8/2/2022 21:21	Incoming	3604103572	"My spot "
8/2/2022 21:22	Outgoing	3604103572	"Meet alabam"
8/2/2022 21:22	Outgoing	3604103572	"Rn"

8/2/2022 21:23	Incoming	3604103572	"K l'm leaving n 5"
8/2/2022 21:50	Outgoing	3604103572	"Ok 5 min"
8/2/2022 21:52	Incoming	3604103572	"Ys"
8/2/2022 21:53	Incoming	3604103572	"Yes on mine n half other "
8/2/2022 21:54	Incoming	3604103572	"N like 30"
8/2/2022 22:50	Incoming	3604103572	"2 minutes away"

75. Based on my training and experience, in this conversation I believe that MARTINEZ LOPEZ agrees to meet the user of 360-410-3572 (TT13) in the Alabama Street area of Bellingham for the user of 360-410-3572 (TT13) to purchase a quantity of drugs from MARTINEZ LOPEZ. Based on the conversation, MARTINEZ LOPEZ and the user of 360-410-3572 (TT13) have a prior drug trafficking relationship where MARTINEZ LOPEZ knows the quantity and type of drugs that the user of 360-410-3572 (TT13) typically purchases, hence the messages do not detail the quantities, types or prices of the drugs to be exchanged.

Messages between MARTINEZ LOPEZ and WITTEVEEN (TT21)

76. According to toll analysis, MARTINEZ LOPEZ (TT10) had been in contact with 360-603-1960 (TT21) used by Jesse WITEVEEN approximately 144 times between July 26, 2022, and August 19, 2022.

77. On July 30, 2022, MARINEZ LOPEZ (TT10) and the user of 360-603-1960 (TT21) exchanged the following messages:

7/30/2022 19:57	Incoming	3606031960	"Hey I want 2 of blue berry's boats and 1 of upper "
7/30/2022 20:20	Outgoing	3606031960	"Ok"
7/30/2022 20:58	Incoming	3606031960	"Where are we meeting at "
7/30/2022 20:59	Incoming	3606031960	"How long "
7/30/2022 21:20	Outgoing	3606031960	"Come to Marysville "
7/30/2022 21:29	Incoming	3606031960	"I was two off sorry"
7/30/2022 21:45	Incoming	3606031960	"Where are we meeting at "

78. Based on training and experience, I know that "blue berry" is commonly used code for "m30" pills, typically containing fentanyl, "boat" is commonly used code for 1,000 pills and "upper" is likely code for some sort of stimulant, possibly cocaine or methamphetamine. In this conversation, investigators believe that MARTINEZ LOPEZ

1 and the user of 360-603-1960 (TT21) ultimately meet for MARTINEZ LOPEZ to
 2 provide 2,000 fentanyl pills and 1 unit of some type of drug to the user of 360-603-1960
 3 (TT21).

4 79. On August 1 and 2, 2022, MARINEZ LOPEZ (TT10) and the user of
 5 360-603-1960 (TT21) exchanged the following messages:

6	8/1/2022 22:13	Incoming	3606031960	"I'm ready with 10"
7	8/1/2022 22:16	Outgoing	3606031960	"Ok I'm in burlington"
8	8/1/2022 22:20	Incoming	3606031960	"I'm on my way "
9	8/1/2022 22:40	Incoming	3606031960	"And can I use a duffle bag "
10	8/1/2022 22:40	Incoming	3606031960	"I forgot mine "
11	8/1/2022 22:40	Outgoing	3606031960	"Give me 30 min bro I'm coming down from the mountains "
12	8/1/2022 22:41	Incoming	3606031960	"OK I just am leaving bham"
13	8/1/2022 23:05	Incoming	3606031960	" What's up home "
14	8/1/2022 23:05	Incoming	3606031960	"Homie"
15	8/1/2022 23:06	Incoming	3606031960	"Where am I going "
16	8/1/2022 23:07	Outgoing	3606031960	"Mount vernon"
17	8/1/2022 23:07	Incoming	3606031960	"OK where "
18	8/1/2022 23:14	Outgoing	3606031960	"Same apartments bro "
19	8/1/2022 23:14	Outgoing	3606031960	"1521 n 26th st "
20	8/1/2022 23:14	Incoming	3606031960	"In Burlington "
21	8/1/2022 23:58	Outgoing	3606031960	"Counted 9,475"
22	8/1/2022 23:58	Incoming	3606031960	"Really "
23	8/1/2022 23:58	Incoming	3606031960	"Can't be "
24	8/1/2022 23:59	Outgoing	3606031960	"It is 1125 added to the bill"
25	8/2/2022 0:01	Outgoing	3606031960	"2,025 last bill + 1,125= 3150 new bill"

26 80. Based on training and experience, I believe that "10" is reference to
 27 \$10,000 that the user of 360-603-1960 (TT21) is going to provide to MARTINEZ
 28 LOPEZ for the purchases of obtaining drugs. Based on the conversation, investigators
 believe that the two individuals met and the user of 360-603-1960 (TT21) provided
 MARTINEZ LOPEZ \$9,475, was provided an unknown quantity of drugs and owed
 MARTINEZ LOPEZ \$3,150 for drugs provided to the user of 360-603-1960 (TT21)

81. On August 12, 2022, MARINEZ LOPEZ (TT10) and the user of 360-603-
 1960 (TT21) exchanged the following messages:

8/12/2022 20:40	Outgoing	3606031960	"10 min away"
8/12/2022 20:54	Incoming	3606031960	"Hey you dump truck i got 1200 more so 5100 i need three boats and one p of other"
8/12/2022 20:55	Outgoing	3606031960	"I'm pulling up"

82. Based on training and experience, I believe that the user of 360-603-1960 (TT21) told MARTINEZ LOPEZ that they had \$5,100 for MARTINEZ LOPEZ and wanted 3,000 fentanyl pills and one "p," likely one pound, of another type of drug.

ADAM WISNIEWSKI Felony Conviction

83. ADAM WISNIEWSKI has been convicted of at least the following crimes punishable by a term of imprisonment exceeding one year in which a term of imprisonment exceeding one year was imposed:

- a. *Unlawful Possession of a Controlled Substance with Intent to Deliver (Heroin)*, in Whatcom County Superior Court, under case number 11-1-00767-0, on or about August 25, 2011.

CORBIN SAUNDERS Felony Convictions

84. CORBIN SAUNDERS has been convicted of at least the following crimes punishable by a term of imprisonment exceeding one year in which a term of imprisonment exceeding one year was imposed:

- a. *Unlawful Possession of a Controlled Substance with Intent to Deliver (Heroin)* and *Unlawful Possession of a Controlled Substance with Intent to Deliver (Methamphetamine)*, in Whatcom County Superior Court, under case number 16-1-00162-1, on or about July 11, 2019; and
- b. *Theft in the Second Degree* and *Forgery*, in Whatcom County Superior Court, under case number 18-1-00301-37, on or about July 11, 2019.

ATF Interstate Nexus Review

85. On November 17, 2022, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Special Agent (SA) Catherine Cole, a certified Interstate Firearms and Ammunition Nexus Expert, who has been trained in the recognition of firearms and

1 ammunition and their origin of manufacture, was provided with a description and
 2 examined photos of the following firearms:

- 3 a) KE Arms, Model KP-15, 5.56x45mm NATO/.223 REM caliber rifle,
 4 with serial number KM05791;
- 5 b) Canik, Model TP9 Elite Combat, 9mm Parabellum caliber pistol,
 6 with serial number BN05248;
- 7 c) Sig Sauer, Model P320 Carry, 9mm Parabellum caliber pistol, with
 8 serial number 58B025078;
- 9 d) Ruger, Model LC9S, 9mm Parabellum caliber pistol, with serial
 10 number 329-54468; and
- 11 e) Heckler & Koch, Model HK4, .380 caliber pistol, with serial number
 12 HR06139.

13 86. Based on the photos and descriptions of the above-listed rifle and pistols,
 14 SA Cole determined that the rifle and pistols were not manufactured in the state of
 15 Washington. Based upon her experience, knowledge, and research, it is also SA Cole's
 16 opinion that the above-listed rifle and pistols meet the definition of a "firearm" under
 17 Title 18, United States Code, Section 921(a)(3). Furthermore, it is SA Cole's opinion
 18 that, because the above-listed firearms were not manufactured in the state of
 19 Washington, they therefore must have traveled in, and thereby affected, interstate
 20 commerce if they were received or possessed in the state of Washington.

21 CONCLUSION

22 87. Based upon the foregoing and my training and experience, I respectfully
 23 submit there is probable cause to believe that ENOC MARTINEZ LOPEZ, MANUEL
 24 GARCIA MUNOZ, CASEY LANDIS, JESSE WITTEVEEN, ADAM WISNIEWSKI,
 25 and CORBIN SAUNDERS committed the offenses set forth above in this Complaint.

26 _____
 27 Joseph T. Cheng
 28 Special Agent
 Drug Enforcement Administration

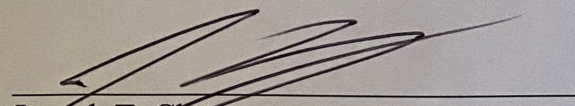
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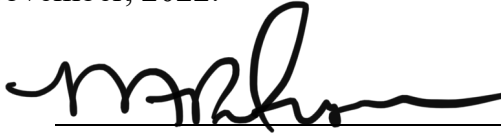
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 24 GARCIA MUNOZ, CASEY LANDIS, JESSE WITTEVEEN, ADAM WISNIEWSKI,
 25 and CORBIN SAUNDERS committed the offenses set forth above in this Complaint.

26 
 27 Joseph T. Cheng
 28 Special Agent
 Drug Enforcement Administration

1 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
2 presence, the Court hereby finds that there is probable cause to believe the Defendant
3 committed the offenses set forth in the Complaint.

4 Dated this 28th day of November, 2022.

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7 MICHELLE L. PETERSON
8 United States Magistrate Judge
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