

Magistrate Judge Brian A. Tsuchida

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

Plaintiff

V.

14 CHANDLER B. BENNETT, and

BRAIDEN F. WILSON.

Defendants.

CASE NO. MJ24-295

COMPLAINT for VIOLATION

Title 21, U.S.C.

Sections 841(a) and 841(b)(1)(A)

and Title 18, U.S.C. Section 2

18 BEFORE, Brian A. Tsuchida, United States Magistrate Judge, U. S. Courthouse,
19 Seattle, Washington,

The undersigned complainant being duly sworn states:

COUNT 1

(Possession of a Controlled Substance with Intent to Distribute)

23 On or about May 14, 2024, in King County, within the Western District of
24 Washington, BRAIDEN F. WILSON and CHANDLER B. BENNETT did knowingly
25 and intentionally possess, with the intent to distribute, and aid and abet the possession of,
26 with the intent to distribute, a controlled substance, including: N-phenyl-N- [1- (2-

1 phenylethyl) -4-piperidinyl] propenamide (*fentanyl*), a substance controlled under Title
2 21, United States Code.

3 Further, the offense involved 400 grams or more of a mixture or substance
4 containing a detectable amount of fentanyl.

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

7 And the complainant states that this Complaint is based on the following
8 information:

9 I, KENNETH C. MESLER, being first duly sworn on oath, depose and say:

10 **INTRODUCTION**

11 1. I am employed as a Special Agent (“SA”) with Homeland Security
12 Investigations (“HSI”) and have been employed with the HSI since September 2020. I am
13 currently assigned to HSI Seattle where I am a member of the Border Enforcement
14 Security Taskforce. I graduated from Federal Law Enforcement Training Center Criminal
15 Investigator Training Program as well as the HSI Academy. Prior to my employment
16 with HSI I was assigned to the Drug Enforcement Administration (“DEA”) as an
17 Intelligence Analyst and a Criminal Analyst where I was assigned to the Seattle Field
18 Division. I am also presently serving in the Washington Air National Guard, United
19 States Air Force Special Warfare, where I have served honorably since 2009.

20 2. As a federal law enforcement officer, I have received formal training, as
21 well as on-the-job training, in the investigation of narcotics trafficking. I have conducted
22 and participated in investigations involving controlled substances, including those leading
23 to arrest and prosecution. As a result of these investigations, I have become familiar with
24 methods and techniques used by narcotics manufacturers and distributors, persons in
25 possession of narcotics for purposes of sales and transportation, and persons conspiring to
26 transport and sell narcotics. I am also familiar with the methods employed by narcotics
27 traffickers to conceal their trafficking activity and the origin of proceeds generated by

1 this activity. I am aware that traffickers use slang and coded words, multiple cell phones,
2 concealed compartments, "stash" houses to conceal their activities, and launder or
3 otherwise conceal cash proceeds by hiding and transporting bulk cash, sending funds
4 through wire transfers or bank accounts in other persons' names, or investing in assets
5 placed in other persons' names. I have also worked and consulted with numerous law
6 enforcement officers experienced in narcotics investigations. As a result, I am familiar
7 with how drug traffickers speak to each other and generally conduct business. For
8 example, I am aware that drug traffickers discussing criminal matters over the phone
9 often speak in code or in vague terms.

10 3. The facts set forth in this Affidavit are based on my own personal
11 knowledge; information obtained from other individuals during my participation in this
12 investigation, including other law enforcement officers; review of documents and records
13 related to this investigation; communications with others who have personal knowledge
14 of the events and circumstances described herein; and information gained through my
15 training and experience. Because this complaint is submitted for the limited purpose of
16 determining whether there is probable cause to support the charge contained herein, it
17 does not set forth each and every fact that I or others have learned during the course of
18 this investigation.

SUMMARY OF PROBABLE CAUSE

20 4. On May 12, 2024, King County Sheriff Deputies (KCSO) responded to a
21 911 call in King County, Washington. Deputies found BRAIDEN WILSON had been
22 shot one time in the arm. WILSON was with his girlfriend, who was identified as
23 CHANDLER B BENNETT and was a witness to the shooting. The shooting allegedly
24 took place near a motorhome with multiple surveillance cameras on the exterior. The
25 cameras appeared to point in the direction of the location where the shooting occurred.
26 Deputies requested BENNETT allow them to enter the motorhome to view the video,
27 however BENNETT was not cooperative with their request to go inside of the

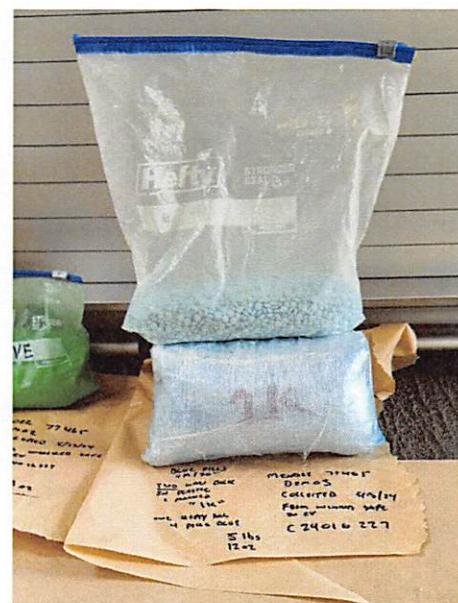
1 motorhome that she was standing in front of. The motorhome was later determined to be
2 BENNETT and WILSON's residence. BENNETT stated the cameras did not work and
3 did not provide consent to enter the motorhome. BENNETT then left the scene stating
4 she wanted to go to the hospital. Based on the fact that BENNETT refused to let deputies
5 inside the motorhome to review the video, deputies applied for and received a King
6 County search warrant to go inside the motorhome.

7 5. After being discharged from the hospital, and before King County received
8 their search warrant, WILSON returned to the motorhome with BENNETT, both being
9 driven by a friend. When they arrived, they found King County Sheriff's deputies on
10 scene awaiting a warrant to enter the motorhome. Deputies informed all parties that they
11 were not permitted to enter the motorhome, and that it was an active crime scene. During
12 the discussion WILSON insisted that he needed to enter the motorhome and an
13 altercation followed, which led to a deputy deploying a taser to control WILSON.
14 WILSON and BENNETT were ultimately permitted to leave the site.

15 6. When deputies served the warrant on the motorhome they encountered a
16 large cache of weapons, narcotics, explosives, and body armor in addition to a multitude
17 of other evidence of narcotics and firearms trafficking, to include packing materials,
18 baggies, scales, digital calipers, and other materials consistent with the distribution of
19 narcotics. Deputies then applied for and received an addendum to the warrant for the
20 discovered contraband.

21
22
23
24
25
26
27

1 7. During the search deputies discovered large quantities of narcotics to
 2 include suspected fentanyl powder, approximately 2.6kg of M30 fentanyl pills,
 3 counterfeit Xanax, and other pressed pills and powders, precursor chemicals, a
 4 homemade pill press and pill die sets bearing the markings "M" and "30," which are
 5 often used in pressing either side of M30 fentanyl pills. I know based off my training and
 6 experience that small blue pills stamped "M" and "30" often contain fentanyl.



17 8. Deputies also discovered approximately 17 firearms, suppressors, body
 18 armor, ballistic shields, ammunition, 3D printed AR-15 lowers without a serial number
 19 (which allows individuals to create homemade rifles without adherence to federal or state
 20 registration processes of such firearms, rendering them untraceable), a 3D printer with
 21 evidence of printing the AR-15 lowers and multiple explosive devices and grenades. The
 22 items mentioned were scattered throughout the motorhome, with no clear separation of
 23

1 assets. Many items were found in plain view and would have been accessible to anyone
2 inside the motorhome.



20
21 9. Throughout the motorhome there were multiple documents with both
22 BENNETT and WILSON's name on them indicating that both lived in the motorhome,
23 and the motorhome registration is in both WILSON and BENNETT's names. Both
24 BENNETT and WILSON had belongings co-located with the seized contraband. Based
25 on the amount of contraband seized and the size of the stockpile agents do not believe it
26 is possible to be unaware of the presence of the contraband inside the motorhome. There
27 was not evidence that anyone else lived in the motorhome. There was a second

1 motorhome onsite that was also searched, that is only in WILSON's name, but nothing of
2 evidentiary value was recovered from that motorhome. All evidence discussed herein was
3 recovered from the motorhome co-owned by WILSON and BENNETT.

4 10. Based on the above facts, I believe that there is probable cause to believe
5 that BRAIDEN F WILSON and CHANDLER B BENNETT did knowingly and
6 intentionally commit the offense of Possession of Controlled Substances with Intent to
7 Distribute, in violation of Title 21, United States Code, Sections 841(a)(1) and
8 841(b)(1)(A).



Kenneth C. Mesler, Complainant
Special Agent
Homeland Security Investigations

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

Dated this 16th day of May, 2024.

Brian A. Tsuchida
United States Magistrate Judge