

Chief Magistrate Judge Brian A. Tsuchida

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESSE S. DITTMAR

Defendant.

NO. MJ20-008

COMPLAINT for VIOLATION

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C)

BEFORE Chief United States Magistrate Judge Brian A. Tsuchida, Seattle,
Washington.

The undersigned complainant being duly sworn states:

COUNT 1

Distribution of Fentanyl and Acetyl Fentanyl

On or about January 14, 2019, within the Western District of Washington, and elsewhere, the defendant, JESSE S. DITTMAR, knowingly and intentionally distributed a mixture or substance containing a detectable amount of (1) N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as fentanyl, a Schedule II controlled substance, and (2) an analog of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as acetyl fentanyl, a Schedule I controlled substance under Title 21, United States Code, Section 812.

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

2
3 This Complaint is based upon the following information:

4 I, Michael Harrold, a United States Postal Inspector, having been duly sworn on
5 oath, depose and say:

6 **INTRODUCTION AND AGENT BACKGROUND**

7 1. I am a Postal Inspector for the United States Postal Service (“USPS”),
8 assigned to investigate the unlawful transportation of contraband, including Title 21
9 controlled substances, through the United States mail. I have been a Postal Inspector
10 since December, 2018, and am currently assigned to the Seattle Division Headquarters
11 office, located in Seattle, Washington. Prior to becoming a Postal Inspector, I was
12 employed as a Special Agent with the Naval Criminal Investigative Service (“NCIS”)
13 from 2011 to 2018, a Trooper with the Georgia State Patrol from 2001 to 2011, and an
14 Officer with the Marietta Police Department from 1999 to 2001.

15 2. As part of my duties as a Postal Inspector, I investigate the use of the
16 U.S. mails to illegally mail and receive controlled substances, the proceeds of drug
17 trafficking, as well as other instrumentalities associated with drug trafficking, in violation
18 of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with
19 intent to distribute controlled substances), and 843(b) (unlawful use of a communication
20 facility, including the U.S. mails, to facilitate the distribution of controlled substances and
21 proceeds from the sale thereof). As set forth below, my training and experience includes
22 the identification of parcels with characteristics indicative of criminal activity. During
23 the course of my employment as a law enforcement officer, I have participated in many
24 criminal investigations involving suspicious parcels and controlled substances.

25 3. I have completed the Criminal Investigator Training Program at the Federal
26 Law Enforcement Training Center and NCIS Special Agent basic training courses. I
27 have also completed Trooper School at the Georgia Public Safety Training Center and

1 basic mandate training at the Northwest Georgia Law Enforcement Academy. I have
2 received specialized training in the investigation of controlled substances in the
3 U.S. mails and on the identification of controlled substances and interdiction of
4 controlled substances.

5 4. I make this affidavit from personal knowledge based on my participation in
6 this investigation, including witness interviews by myself and/or other law enforcement
7 agents, communications with others who have personal knowledge of the events and
8 circumstances described herein, and information gained through my training and
9 experience. The information outlined below is provided for the limited purpose of
10 establishing probable cause and does not contain all details or all facts of which I am
11 aware relating to this investigation.

12 5. In the following paragraphs, I describe communications between various
13 individuals. Except where specifically indicated with quotation marks, the descriptions
14 are summaries of the conversations and are not meant to reflect specific words or
15 language used.

16 **SUMMARY OF PROBABLE CAUSE**

17 6. On January 29, 2019, a 32-year-old female was discovered unresponsive at
18 a family member's home in the Seattle area. She was declared deceased at the scene by
19 first responders with the Seattle Fire Department. In the follow-up investigation, the
20 King County Medical Examiner's Office determined that the likely cause of death was
21 acute drug intoxication, including fentanyl.

22 7. Based on the items found at the scene of the victim's death and a review of
23 her phone and other records, investigators with the U.S. Postal Inspection Service
24 ("USPIS") have identified Jesse S. DITTMAR as the person who provided the victim
25 with fentanyl and acetyl fentanyl, which he sent to her from the Philadelphia area using
26 the U.S. mails. Packaging recovered from the victim's residence and messages recovered
27 from her phone demonstrate that, throughout December, 2018 and January, 2019,

1 DITTMAR sent the victim fentanyl in greeting cards sent via First Class mail and
2 Express parcels. On or about January 14, 2019, DITTMAR sent the victim a greeting
3 card containing fentanyl and acetyl fentanyl, which she did not receive until January 28,
4 2019, the day before her death.

5 **A. The Victim's Death**

6 8. On January 29, 2019, a 32-year-old female was discovered unresponsive in
7 her bedroom at her brother's home in the Seattle area. According to her brother, the
8 victim had moved to Seattle from Pennsylvania in the fall of 2018, after breaking up with
9 her boyfriend, DITTMAR. Before she moved to Seattle, and while still in a relationship
10 with DITTMAR, the victim attempted suicide by overdose. She survived but, according
11 to the victim's brother, DITTMAR became very controlling, and the victim decided to
12 leave the relationship. According to her brother, the victim hoped to start new in Seattle,
13 so she secretly left Philadelphia and cut off communication with DITTMAR.

14 9. The victim's brother had last seen her alive on the evening of January 28,
15 2019, when she had gone into her bedroom at his home. When the victim did not leave
16 her room the next day or respond to any calls or texts, her brother returned home from
17 work to check on her. He forced open the door to her bedroom, which was locked, and
18 found her body lying on the ground next to her bed. First responders with the Seattle Fire
19 Department declared the victim deceased at the scene.

20 **B. Initial Investigation by the King County Medical Examiner's Office**

21 10. Investigators with the Seattle Police Department and the King County
22 Medical Examiner's Office responded to the brother's home and processed the victim's
23 bedroom. In a dresser drawer, investigators found six small plastic bags labeled "Just
24 Blaze," five of which contained a white powdered substance believed to be fentanyl, and
25 one of which was empty save for the "Just Blaze" wrapping. Investigators also found
26 similar small plastic bags throughout the room that contained only wrappings, including
27 five blue paper wrappings and three white wrappings labeled "VIP." Based on my
28

1 training and experience, I know that fentanyl is a white powder that is often sold in small
2 plastic bags that contain wrappings similar to those found in the victim's room. Drug
3 dealers are known to "brand" the products that are sold with names and specific
4 packaging to facilitate the sale of the narcotics.

5 11. Investigators found several pieces of mail in the room, including greeting
6 cards signed "Jesse" and a USPS Express parcel from "John Simpson, 285 Butterworth
7 Ln, Langhorne, Pa 19047" to the victim's name at her brother's address, which was
8 shipped from the Bensalem, Pennsylvania Post Office on January 3, 2019.

9 12. Finally, investigators found in the room several empty bottles of beer and
10 wine, a bottle of medication prescribed to the victim, cold medication, three 10 milliliter
11 vials of Lidocaine, and a number of syringes. The victim's brother did not know why the
12 victim had Lidocaine in her room, but believed that she was having issues with her teeth
13 and may have used it to numb related pain.

14 13. The victim's body was transported to the King County Medical Examiner's
15 Office, where an autopsy was performed. Based on the autopsy and preliminary
16 toxicology tests, the Medical Examiner later concluded that the cause of the victim's
17 death was acute drug intoxication, including fentanyl. Later testing of the victim's blood
18 and the white substance found in the "Just Blaze" bags recovered from the victim's room
19 later confirmed the presence of fentanyl and acetyl fentanyl.¹

20 **C. Subsequent Investigation by the U.S. Postal Inspection Service**

21 14. In the week after the victim's death, family members began to clean the
22 room in which she had been found. While cleaning the room, her brother found the
23 victim's unlocked Apple iPhone, which he looked through and found messages relating
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25 ¹ The victim's blood and the white substance recovered from her room also tested positively for
26 the presence of xylazine, a non-controlled substance that is used as a tranquilizer for horses,
27 cattle, and other non-human mammals. The victim's blood also tested positively for the presence
28 of citalopram, for which the victim had a prescription; pseudophedrine, a common cold
medication; and caffeine.

1 to drug use. The family notified the King County Medical Examiner's Office about their
2 findings, who in turn contacted USPIS, as the investigation to that point had shown that
3 the narcotics had likely been provided to the victim through the U.S. mails. On
4 February 1, 2019, the victim's family turned this phone over to investigators with USPIS
5 for review. In an interview with the victim's brother, he confirmed that he did not delete
6 or change any of the data contained on the phone before turning it over to law
7 enforcement.

8 15. Family members also found additional small plastic bags containing empty
9 wrappings in the victim's jacket and the packaging for several items of mail that had been
10 sent from Pennsylvania, including envelopes that had been sent by USPS First Class mail
11 and parcels sent by USPS Express. The victim's family provided the jacket, wrappings,
12 and mailings recovered from the victim's room to USPIS investigators.

13 16. I conducted a review of the victim's cell phone and located messages
14 between the victim and a contact listed as "Jay." Based on searches of law enforcement
15 databases and information located on arrest reports for DITTMAR, I have identified the
16 phone number, email address, and physical address listed in the victim's phone for the
17 contact "Jay" as being associated with DITTMAR. Moreover, the content of the text
18 messages, chats, and photos sent between the victim and "Jay" confirm that "Jay" is, in
19 fact, DITTMAR.

20 17. In reviewing the phone's contents, it appears that DITTMAR repeatedly
21 contacted the victim in the first few months that she was living in Seattle, and that she did
22 not respond until December, 2018. In the victim's phone, I identified over 600 chat
23 message groups between the victim and DITTMAR, containing almost 9,000 messages.
24 These messages range in date from December 31, 2017 to the date of the victim's death
25 on January 29, 2019, with the majority of the messages falling after December 20, 2018.
26 Multiple messages and photographs exchanged by the victim and DITTMAR reference
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1 the distribution of fentanyl and DITTMAR's use of the U.S. mails to send the victim
2 greeting cards containing controlled substances in December, 2018 and January, 2019.

3 ***1. December 24, 2018 Mailing***

4 18. In his messages with the victim in December, 2018, DITTMAR made
5 numerous references to obtaining fentanyl for the victim and sending it to her through the
6 mail. For example, on December 21, 2018, DITTMAR messaged the victim to tell her
7 that he had "sent [] that dope I bought last night this morning. . . . If you want the
8 tracking number let me know." DITTMAR offers to send additional narcotics to the
9 victim, noting that he can get "2 different kinds of fetantyl. [sic] A dope fetynal [sic]
10 split or a dope tranquilizer split." DITTMAR then tells the victim that he has to "stop at
11 711 and grab [her] a card" and, later, sends her a photograph that includes two needles
12 and a number of small plastic bags containing suspected fentanyl in blue wrapping.

13 19. Later that evening, DITTMAR and the victim discussed the amount of
14 postage that he would need to send a card to her, and DITTMAR tells her that she needs
15 to call him or he is "keeping [the] drugs. And this very cool card." DITTMAR then says
16 that he has realized that "[f]etynal [sic] is probably much better to send no sent [sic]."
17 Finally, DITTMAR tells the victim to be careful, because "[i]t did kill a few thousand
18 people in Philly this summer."

19 20. On December 23, 2018, DITTMAR messaged the victim to say that, while
20 preparing to mail her card, he "dipped out" of his car in front of the Post Office and had
21 been "arrested with [her] dope." According to DITTMAR, the arresting officer had taken
22 "13 bags" when he was arrested, but the victim shouldn't worry, because he "went back
23 down after they released [him]" and sent her "5." I confirmed that the Bristol Township,
24 Pennsylvania Police Department arrested DITTMAR on December 23 and have reviewed
25 the arresting officer's report. The report indicates that DITTMAR was found alone,
26 sleeping in a vehicle parked in the parking lot of the Croydon, Pennsylvania Post Office.
27 In DITTMAR's possession, the arresting officer located two needles, three methadone

1 pills, and twelve blue bags labeled “flatline,” which the arresting officer suspected
2 contained heroin. DITTMAR admitted to purchasing the drugs in Philadelphia and using
3 one of the bags prior to his arrest.

4 21. After the victim’s death, her brother provided me with an image that he had
5 received on the USPS Informed Delivery application, a consumer-facing feature offered
6 by USPS that provides users with digital previews of their household mail arriving soon.
7 The image shows an item of First Class mail that was postmarked December 24, 2018
8 and sent from Philadelphia, Pennsylvania to the victim at her brother’s address. The
9 return address on the envelope is “Jesse D, 285 Butterworth Ln, Langhorne, Pa, 19047.”
10 A search of available law enforcement databases shows that DITTMAR once lived at
11 another house number on Butterworth Lane. Moreover, in text messages between the
12 victim and DITTMAR on January 23, 2019, DITTMAR mentions that a card with that
13 return address would be returned to his “old next door neighbor.”

14 **2. January 3, 2019 Mailing**

15 22. On January 1, 2019, DITTMAR sent the victim a photograph of nineteen
16 small plastic bags containing suspected fentanyl in blue wrapping. In the messages that
17 follow, DITTMAR told the victim that he would send some of the suspected fentanyl to
18 her. The next day, on January 2, 2019, DITTMAR messaged the victim to tell her that
19 “[t]he dope last night was crap so I wanna get you something better.” Later that evening,
20 DITTMAR sent the victim a photograph of twenty-four small plastic bags containing
21 fentanyl in blue wrappings or bearing “VIP” labels, consistent with items found in the
22 victim’s bedroom after her death.

23 23. On January 3, 2019, DITTMAR messaged the victim reiterating a demand
24 that she come on a vacation with him, because he was “risking a federal offense” to send
25 her fentanyl, “[e]specially overnight where there are cameras.” DITTMAR asks the
26 victim for her address and, after she provides her brother’s address, he confirms that the
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1 package has been sent. DITTMAR then sent the victim photographs of the parcel
2 tracking number, EE323999570US, and the receipt for the mailing.

3 24. The parcel matching this tracking number, Express Parcel
4 EE323999570US, was recovered from the victim's bedroom after her death. The parcel
5 was shipped from the Post Office at Bensalem, Pennsylvania on January 3, 2019 and lists
6 the sender as "John Simpson" at the same Butterworth Lane address listed as the return
7 address on the December 24, 2018 mailing.

8 **3. January 14, 2019 Mailing²**

9 25. On January 13, 2019, DITTMAR messaged the victim to tell her that he
10 would be sending her something called "just blaze," consistent with the label on the
11 opened package of fentanyl found in the victim's room. DITTMAR told the victim that
12 the drug used to go by two different names, but that it "change[s] names everytime
13 someone d[i]es."

14 26. On January 14, 2019, DITTMAR asked the victim in a text message to send
15 her address again, and she sends him her brother's address in Seattle. DITTMAR told the
16 victim that the card he is sending is heavy, and he and the victim discussed the number of
17 stamps that he should put on the letter, settling on two.

18 27. The card that DITTMAR sent did not arrive until January 28, 2019 and,
19 over the next two weeks, DITTMAR and the victim messaged each other about the
20 missing card.

21 a. On January 16, 2019, the victim messaged DITTMAR to ask when
22 he had mailed the card. DITTMAR responded that he probably mailed it
23 on Monday, January 14, and that he thought it would arrive on Thursday or
24 Friday of that week.

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26 ² Mailings recovered from the victim's bedroom and messages between the victim and
27 DITTMAR demonstrate that DITTMAR sent additional mailings to the victim on December 6
28 and 15, 2018, and on January 10, 2019.

b. On January 17, 2019, the victim messaged DITTMAR to say that the mail had not arrived that day and to ask “how many” he had sent her.

DITTMAR told the victim that he had sent “6 bags of [his] all time favorite” and to be careful.

c. On January 19, 2019, DITTMAR messaged the victim that he thought he should have put three stamps on the card, because it was heavy.

d. On January 23, 2019, the victim messaged DITTMAR that she did not think the card was coming, but that he did not have to send any more to her. DITTMAR responded that the card was heavy and “sick,” because it had a “pop up tiger with wings.”

28. At approximately 5:51 p.m. on January 28, 2019, the victim messaged DITTMAR a picture of a greeting card decorated with a tiger with wings, commenting: “Can’t believe it came.” The victim then told DITTMAR that she had done “the smallest line ever and couldn’t even walk straight.” At approximately 8:08 p.m., the victim messaged DITTMAR that she was not feeling well and had thrown up after dinner with her brother’s family. Shortly afterward, the victim stopped responding to messages.

29. A greeting card with a flying tiger on the front, identical to the card in the picture that the victim sent DITTMAR on January 28, 2019, was recovered from the victim’s room after her death. The card is signed “Jesse” and was sent in an envelope that was addressed to the victim at her brother’s address. The envelope bears no sender name but, again, has a return address of “285 Butterworth Ln, Langhorne, PA 19047.” Also found in the victim’s room after her death was a handwritten note stating “Secret Magic Dust to Make Tiger Fly!”, which was contained in the wrapping about the small plastic bags containing fentanyl and labeled “Just Blaze.”

CONCLUSION

30. Based on the foregoing, I respectfully submit that there is probable cause to believe that the defendant, JESSE S. DITTMAR, committed the crime of distribution of

1 fentanyl and acetyl fentanyl, in violation of Title 21, United States Code, Sections
2 841(a)(1) and (b)(1)(C).



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6 MICHAEL D. HARROLD, Complainant
U. S. Postal Inspection Service, Postal Inspector

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8 The above-named agent provided a sworn statement attesting to the truth of the
9 foregoing Complaint and Affidavit by telephone on this 10th day of January, 2020.
10 Based on the Complaint and Affidavit, the Court hereby finds there is probable cause to
11 believe that the defendant committed the offense set forth in the Complaint.



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14 BRIAN A. TSUCHIDA
15 Chief United States Magistrate Judge
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