

Magistrate Judge Mary Alice Theiler

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

UNITED STATES OF AMERICA,

Plaintiff

v.

TROY KLANDER  
ZACKARY SALAS,

Defendants.

NO. MJ20-293

COMPLAINT FOR VIOLATION

21 U.S.C. §§ 841(a)(1), (b)(1)(C), and 846

BEFORE, Mary Alice Theiler, United States Magistrate Judge, U. S. Courthouse,  
Seattle, Washington.

**COUNT 1**  
**(Conspiracy to Distribute Fentanyl)**

Beginning at a time unknown, but no later than January 31, 2020, and continuing  
until on or about May 28, 2020, in Whatcom County, within the Western District of  
Washington and elsewhere, the defendants, TROY KLANDER and ZACKARY  
SALAS, and others known and unknown, did knowingly and intentionally conspire to  
distribute N-phenyl-N-[1-(2 phenylethyl)-4-piperidinyl] propanamide, also known as

1 | fentanyl, a Schedule II controlled substance under Title 21, United States Code, Section  
2 | 812.

3 | All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C),  
4 | and 846.

5 | This Complaint is based upon the following information:

6 | I, Christopher VandenBos, a Task Force Officer with the Drug Enforcement  
7 | Administration (DEA), United States Department of Justice, being first duly sworn on  
8 | oath, depose and say:

9 | **INTRODUCTION AND AGENT BACKGROUND**

10 | 1. I am an “investigative or law enforcement officer of the United States”  
11 | within the meaning of Title 18, United States Code, Section 2510(7). Specifically, I am a  
12 | Task Force Officer with the Drug Enforcement Administration (“DEA”), assigned to the  
13 | Bellingham, Washington Resident Office. In that capacity, I investigate violations of the  
14 | Controlled Substances Act (Title 21, United States Code, Section 801, *et seq.*). I have  
15 | been assigned as a Task Force Officer with the DEA since January 2019. Prior to  
16 | becoming a Task Force Officer, I was a Deputy with the Whatcom County Sheriff’s  
17 | Office in Washington. I received my Washington State law enforcement commission in  
18 | 2015. In my experience as a law enforcement officer, I have participated in numerous  
19 | narcotics investigations, during the course of which I have participated in physical  
20 | surveillance, interviews, and executions of state and federal search warrants. As a law  
21 | enforcement officer, I have participated in both death and homicide investigations.

22 | 2. I have completed the Undercover Techniques and Survival for Narcotics  
23 | Officers School hosted by the Western Regional Counterdrug Training Center, as well as  
24 | other training courses related to gangs and narcotics trafficking. I have participated in  
25 | narcotics investigations at both the local and federal level, and I have participated in the  
26 | execution of federal search warrants. As a result, I have become familiar with methods  
27 | of operation of drug traffickers and organizations. As a Task Force Officer with the  
28 | DEA, I have the responsibility of working with other federal and state law enforcement

1 officers in investigations of violations of federal and state controlled substance laws,  
2 including the investigation of cocaine, methamphetamine, heroin, fentanyl, marijuana and  
3 other dangerous drug organizations.

4 3. I have participated in the debriefing of defendants, witnesses, and  
5 informants, during which time I have discussed with them their methods of drug  
6 smuggling, distribution, packaging, trafficking, avoiding law enforcement, and  
7 laundering proceeds, among other concerns related to drug trafficking. I have discussed  
8 and learned from other law enforcement investigators in regards to these matters as well.

9 4. Based on my training, experience, and conversations with other  
10 experienced narcotics investigators, I have gained experience in the techniques and  
11 methods used by drug traffickers to distribute controlled substances, their use of cellular  
12 phones and other electronic communication devices to facilitate their trafficking activity,  
13 and the methods used to conceal and launder the proceeds of said activity.

14 5. The facts in this affidavit come from my personal observations, my training  
15 and experience, and information obtained from other agents and witnesses. My  
16 specialized training and experience, as well as the assistance and input of experienced  
17 fellow investigators, in drug investigations form a basis for my opinions and conclusions,  
18 which I drew from the facts set forth herein.

19 **SOURCES OF INFORMATION**

20 6. I make this Affidavit based upon personal knowledge derived from my  
21 participation in this investigation and upon information I believe to be reliable from  
22 various sources, including:

23 a. My training and experience investigating drug trafficking and related  
24 criminal activity, as described above;

25 b. Oral and written reports and documents about this and other  
26 investigations that I have received from agents of the DEA, the Whatcom County Sherriff's  
27 Office (WCSO), and other federal, state and local law enforcement agencies;  
28

c. Physical and digital surveillance conducted by the aforementioned agencies, and other law enforcement agencies, that has been reported to me directly or indirectly;

d. Telephone toll records, pen register and trap and trace information, and subscriber information;

e. Washington State Department of Licensing records;

f. Commercial databases;

g. Public records; and

h. Publicly viewable information on social media websites (*i.e.*, Facebook, Instagram).

7. Since this Affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are essential to establish the necessary foundation for a fair determination of probable cause to support the Complaint.

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

### **PROBABLE CAUSE**

#### **A. Identification of Troy KLANDER as a Fentanyl Dealer**

9. On January 28, 2020, investigators from the Whatcom Gang and Drug Task Force (WGDTF) and the DEA Bellingham Resident Office interviewed a WGDTF confidential source (hereinafter "CS1"). CS1 told the investigators that he/she could purchase fentanyl-laced pills from an individual named Troy KLANDER. When shown a Washington State Department of Licensing photo of KLANDER, CS1 confirmed the person in the photo as the person from whom he/she had been buying fentanyl-laced pills.



1        10. CS1 provided (360) 927-7237 as KLANDER's phone number.  
2 Investigators later obtained subscriber information for that phone number and confirmed  
3 that the number was subscribed to "Richard Klander" at 1656 Mt Baker Highway,  
4 Bellingham, WA, serviced by Verizon. Open-source and law enforcement database  
5 queries revealed that Richard Klander owns 1656 Mt. Baker Highway and is Troy  
6 KLANDER's father.

7        11. CS1 started cooperating with the WGDTF in late January 2020 in return for  
8 prosecutorial consideration after WGDTF investigators had bought fentanyl-laced  
9 counterfeit pills from CS1 on three separate occasions. CS1 is currently under judicial  
10 supervision relating to a 2018 Washington State misdemeanor and gross misdemeanor  
11 arrest. The underlying arrest was not for a crime of dishonesty.

12 **B. First Controlled Buy of Fentanyl-Laced Pills from KLANDER on January**  
13 **31, 2020**

14        12. On January 31, 2020, investigators met with CS1. CS1 told investigators  
15 that he/she had contacted KLANDER over the phone prior to his/her meeting with the  
16 investigators and arranged to meet with KLANDER to buy fentanyl-laced pills. CS1  
17 showed investigators text messages exchanged between him/her and KLANDER, in  
18 which KLANDER and CS1 discussed a meeting place for the deal and the amount of  
19 fentanyl pills that CS1 would purchase. KLANDER and CS1 ultimately agreed to meet  
20 around North State Street, Bellingham, Washington. The phone number listed for  
21 KLANDER in CS1's phone was (360) 927-7237. Before sending CS1 to do the  
22 controlled buy, investigators searched CS1 and CS1's vehicle for contraband, such as  
23 drugs and weapons, and US paper currency; none was found. Investigators provided CS1  
24 with pre-recorded buy funds.

25        13. Investigators then followed CS1 to a parking lot adjacent to 1511 North  
26 State Street, Bellingham, Washington, where CS1 was supposed to meet with  
27 KLANDER for the deal. Approximately twelve minutes after CS1's vehicle arrived at the  
28 parking lot, investigators observed a male, whom they identified as KLANDER based on

1 his Washington State Department of Licensing photograph, getting into CS1's vehicle  
2 after arriving in the area on foot. CS1 then drove a short distance in the parking lot.  
3 Approximately a minute later, investigators saw KLANDER getting out of CS1's vehicle  
4 and walk towards the apartment located at 1511 North State Street. After KLANDER and  
5 CS1 separated, investigators followed CS1 from the deal location to another location for  
6 debriefing.

7 14. At the debriefing location, CS1 provided investigators with three suspected  
8 fentanyl-laced pills. The pills were round, light blue in color, and stamped "M 30." I  
9 know, based on my training and experience, that these "M 30" pills are consistent in  
10 appearance with counterfeit pills that are designed to look like 30mg oxycodone pills but  
11 actually contain fentanyl and/or fentanyl analogues. These pills have been located  
12 throughout Whatcom and Skagit County in recent months.

13 15. Investigators then searched CS1 and CS1's vehicle for contraband, such as  
14 drugs and weapons, and US paper currency; none was found. During a subsequent  
15 debriefing, CS1 told investigators that he/she gave the pre-recorded buy funds to  
16 KLANDER and received the aforementioned "M 30" pills in exchange.

17 **C. Second and Third Controlled Buys from KLANDER on February 4, 2020**

18 16. On February 4, 2020, investigators met with CS1 again. CS1 showed  
19 investigators text messages he/she exchanged with KLANDER at (360) 927-7237 on  
20 February 3, 2020, in which CS1 asked KLANDER to save him/her "8." Investigators  
21 recognized this as a request to set aside eight "M 30" pills in KLANDER's inventory for  
22 CS1. In the following text messages, CS1 and KLANDER agreed upon a time and place  
23 for a deal for fentanyl-laced pills.

24 17. Prior to sending CS1 to do a controlled buy with KLANDER, investigators  
25 searched CS1 for contraband, such as drugs and weapons, and US paper currency; none  
26 was found. CS1's vehicle was not searched. Investigators provided CS1 with pre-  
27 recorded buy funds. CS1 was equipped with recording equipment.

1 18. Investigators then followed CS1 to a parking lot in Bellingham,  
2 Washington, where CS1 and KLANDER had agreed to meet. Investigators established  
3 surveillance around the apartment located at 1511 North State Street prior to the arranged  
4 meeting. Investigators observed KLANDER leaving Apartment 253 at 1511 North State  
5 Street before the meeting. A white 2000 Nissan Frontier bearing Washington License  
6 plate C90196E soon arrived at the meeting location, which was a parking lot in  
7 Bellingham, Washington. A check of the license plate through the Washington State  
8 Department database showed that the Nissan Frontier was registered to Troy John  
9 KLANDER at 1656 Mount Baker Highway, Bellingham, Washington.

10 19. Once the Nissan Frontier arrived at the location, CS1 got out of his/her car  
11 and into the Nissan Frontier. After a short stay, CS1 got out of the Nissan and left the  
12 area; investigators followed CS1 to a pre-arranged location for debriefing. Investigators  
13 also positively identified KLANDER as the driver of the Nissan following the controlled  
14 buy. Investigators then followed KLANDER and the Nissan to 1511 North State Street.

15 20. Investigators then met with CS1 for debriefing. CS1 provided investigators  
16 with approximately eight "M 30" pills, consistent in their appearance with the pills  
17 previously purchased by CS1 from KLANDER. Some of the pills were partially broken  
18 down and not whole. Based on my training and experience, I know that these counterfeit  
19 "M 30" pills laced with fentanyl are sometimes less durable than pharmaceutical-grade  
20 pills manufactured in legitimate laboratories.

21 21. Investigators subsequently searched CS1 and CS1's vehicle for contraband,  
22 such as drugs and weapons, and US paper currency; none was found.

23 22. During the ensuing debriefing session, CS1 told investigators he/she had  
24 gotten into Klander's Nissan, gave KLANDER pre-recorded buy funds, and received the  
25 "M 30" pills in return. According to CS1, KLANDER told CS1 during the controlled  
26 buy that he would receive new supplies of "M 30" pills at around 5 p.m. that evening.  
27 Investigators later reviewed the recording of the controlled buy and heard KLANDER  
28



1 saying that “his guy” would be off work at 5 and that “ten”—investigators interpreted this  
2 as ten “M 30” pills—KLANDER had in his possession would not last him very long.

3 23. Later the same day, investigators arranged another controlled buy from  
4 KLANDER through CS1 to identify KLANDER’s supplier. At approximately 5:27 p.m.,  
5 investigators saw KLANDER leaving 1511 North State Street in his Nissan Frontier and  
6 driving to another parking lot in Bellingham, Washington. At around 5:43 p.m.,  
7 KLANDER was seen repeatedly checking his cellphone while in his Nissan.

8 24. In the meantime, CS1 sent a text message to KLANDER at (360) 927-7237  
9 at approximately 5:39 p.m., asking to buy additional “M 30” pills. KLANDER  
10 immediately responded, suggested a meeting location for the deal, and said: “on my way  
11 to reup first.” Investigators recognized the term “reup” as a common term for re-stocking  
12 supplies of illegal drugs.

13 25. At approximately 5:48 p.m., investigators saw KLANDER leaving the  
14 parking lot in his Nissan. Surveillance was maintained on KLANDER. At approximately  
15 5:50 p.m., CS1 received a message from KLANDER at (360) 927-7237, saying: “head  
16 there now.” At approximately 5:59 p.m., investigators saw KLANDER’s Nissan arriving  
17 at 4731 East Oregon Street, Bellingham, Washington. The Nissan then parked in front of  
18 an open garage door of a detached shop building at that address. The Nissan stayed there  
19 for approximately 10 minutes and left at approximately 6:09 p.m. Immediately following  
20 the Nissan’s departure from 4731 East Oregon Street, CS1 received a text message from  
21 KLANDER. The text message said: “2 min.”

22 26. While the surveillance was ongoing, investigators searched CS1 and his/her  
23 vehicle for contraband, such as drugs and weapons, and US paper currency, in  
24 preparation for the impending deal; none was found. CS1 was provided with pre-  
25 recorded buy funds and recording equipment. Investigators then followed CS1 to the  
26 deal location suggested by KLANDER.

27 27. At approximately 6:11 p.m., investigators observed KLANDER’s Nissan  
28 Frontier arrive at the deal location. The Nissan parked near CS1’s vehicle. Although



1 investigators were not able to see the exact movement of KLANDER due to the position  
2 of surveillance units and the darkness, investigators saw the passenger door of the Nissan  
3 opening and heard conversation taking place between CS1 and KLANDER through the  
4 covert audio transmitting equipment CS1 was wearing. Following the conversation, CS1  
5 left the area and drove to a pre-arranged location for debriefing.

6 28. At the debriefing session, CS1 gave investigators approximately ten “M  
7 30” pills. Some of these pills were partially broken down, similar to the pills bought  
8 earlier that day. Investigators then searched CS1 and CS1’s vehicle for contraband,  
9 including drugs and weapons, and US currency; none was found. CS1 told investigators  
10 that once the Nissan arrived at the deal location, he/she got into the Nissan, gave  
11 KLANDER the pre-recorded buy funds, and received ten “M 30” pills in return. A review  
12 of the audio recording from the controlled buy confirmed CS1’s description of events.<sup>1</sup>

13 29. The ten pills purchased from KLANDER were later tested and confirmed  
14 by the DEA Western Laboratory to contain fentanyl. According to the report, each pill  
15 weighed approximately 0.11 gram.

16 **D. Surveillance of 4731 East Oregon Street, Bellingham, WA on February 7,**  
17 **2020, and Identification of SALAS as Potential Supplier of KLANDER**

18 30. On February 7, 2020 at approximately 4:45 p.m., investigators established  
19 surveillance at 4731 East Oregon Street. Immediately after surveillance was established,  
20 KLANDER’s Nissan Frontier was seen leaving the driveway associated with the address.  
21 Approximately three minutes later, a black Toyota Tundra bearing Washington license  
22 plate C89748E was also seen leaving the same driveway.

23 31. According to the Washington State Department of Licensing, the Toyota  
24 Tundra was registered to Zackary SALAS at 4337 Squalicum Lake Road, Bellingham,  
25

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26 <sup>1</sup> This was the last time CS1 was utilized by investigators to conduct a controlled purchase from KLANDER. While  
27 conducting surveillance on KLANDER in the weeks following the third controlled purchase from KLANDER,  
28 investigators observed CS1 meet with KLANDER without investigators’ direction. Investigators ceased using CS1  
as a cooperator for the investigation on KLANDER following this observation. CS1 later admitted to purchasing  
pills from KLANDER outside of the direction of investigators for personal consumption.

1 Washington. A check of a Whatcom County Sheriff's Office database showed that  
2 SALAS had been contacted by law enforcement in Bellingham, Washington, as the driver  
3 of the Toyota Tundra for a traffic citation on September 6, 2019.

4 32. Investigators researched SALAS's name on Whatcom County Sheriff's  
5 Office and Bellingham Police Department (BPD) databases. SALAS's cell phone  
6 number was listed in both databases as (360) 303-2184. A follow-up research on the  
7 number showed that the number was being serviced by AT&T and that the service was  
8 activated on August 25, 2018. The subscriber name for the number was Zackary SALAS  
9 and the listed user address 4731 E Oregon St, Bellingham, WA 98226.

10 33. Investigators reviewed toll data associated with (360) 303-2184 and  
11 discovered that between January 2, 2020 and February 4, 2020, approximately 50  
12 telephonic contacts were made between (360) 303-2184 (SALAS's cell phone) and (360)  
13 927-7237 (KLANDER's cell phone). On February 4, 2020, the day investigators  
14 conducted two controlled buys from KLANDER, there was one contact between the two  
15 cell phones at approximately 8:24 p.m.<sup>2</sup>

16 34. Investigators subsequently obtained the International Mobile Equipment  
17 Identity (IMEI) numbers for both cell phones and identified both cell phones as iPhones.  
18 Based on my training and experience, I know that messages between iPhones are often  
19 exchanged on the "iMessage" platform over an internet connection and are not reflected  
20 in the toll records.

21 **E. Surveillance of 4731 East Oregon Street on February 10 and 14, 2020**

22 35. On February 10, 2020, investigators established surveillance at 4731 East  
23 Oregon Street. At approximately 6:17 p.m., investigators saw SALAS's Toyota Tundra  
24 leaving the driveway of 4731 East Oregon Street. Investigators followed the Toyota  
25  
26  
27

28 <sup>2</sup> As described above, the drug trafficking activity observed by investigators related to the controlled buys on  
February 4, 2020 ended around 6:11 p.m., which was approximately two hours prior to the phone call.

1 Tundra to the 4300 block of Squilicum Lake Road, near SALAS's listed address for the  
2 vehicle registration.

3 36. On February 14, 2020, investigators again established surveillance around  
4 4731 East Oregon Street. At approximately 4:25 p.m., investigators saw KLANDER's  
5 Nissan Frontier leaving the driveway of 4731 East Oregon Street. A male matching the  
6 description of KLANDER was the driver. Then, at approximately 4:46 p.m., investigators  
7 saw KLANDER's Toyota Tundra also leaving the same driveway. Investigators  
8 identified SALAS as the driver of the Toyota Tundra based on SALAS's Washington  
9 Department of Licensing photo.

10 **F. Information Received from a Whatcom Gang and Drug Task Force**  
11 **Confidential Source on February 11, 2020**

12 37. On February 11, 2020, investigators interviewed a WGDTF Confidential  
13 Source (hereinafter "CS2"). CS2 agreed to cooperate with investigators in exchange for  
14 prosecutorial consideration after being apprehended by law enforcement with a user  
15 amount of suspected fentanyl-laced pills in his or her possession.

16 38. CS2 has a felony conviction from 2016 for Possession of a Controlled  
17 Substance. CS2 also has a 2016 gross misdemeanor conviction (malicious mischief in  
18 the third degree) and a 2014 misdemeanor conviction (driving while license suspended).  
19 CS2 has no known convictions related to crimes of dishonesty. During the interview, CS2  
20 identified KLANDER as his/her source for "M 30" pills.

21 **G. Fourth Controlled Buy of Fentanyl-Laced Pills from KLANDER on February**  
22 **18, 2020**

23 39. On February 18, 2020 at approximately 4:32 p.m., investigators met with  
24 CS2 to conduct another controlled buy from KLANDER. CS2 told investigators that  
25 he/she had communicated with KLANDER at (360) 927-7237 prior to the meeting with  
26 the investigators and arranged a deal to buy "M 30" pills from KLANDER at a location  
27 in Bellingham later that day.



1       40. Investigators reviewed the text messages exchanged between CS2 and  
2 KLANDER at (360) 927-7237 earlier that morning to set up the deal. One of the  
3 messages from KLANDER said; “K, I’m trying to reup now.” When CS2 asked to buy  
4 approximately 20 pills, KLANDER responded: “Yeah, I picked it up already.”

5       41. Before sending CS2 to do the deal with KLANDER, investigators searched  
6 CS2 for contraband, including drugs and weapons, as well as US paper currency; none  
7 was found. CS2 was provided with pre-recorded buy funds and recording equipment.

8       42. A few minutes prior to the planned meeting with KLANDER, CS2, acting  
9 at the direction of investigators, texted KLANDER at (360) 927-7237 and asked to buy  
10 additional “M 30” pills. Investigators hoped this would spur KLANDER to contact his  
11 source again and obtain more supplies while under observation by investigators.  
12 KLANDER responded to CS2 by text: “Coming from Ferndale but only have what u  
13 wanted and a couple extras. I can grab what I have at the house fast.” A Customs and  
14 Border Protection (CBP) helicopter assisting with surveillance observed KLANDER’s  
15 Nissan Frontier truck arriving at 1656 Mount Baker Highway, Bellingham, Washington.  
16 The driver, later confirmed to be KLANDER by ground surveillance, was observed going  
17 into the house at that address briefly. KLANDER then returned to his Nissan Frontier,  
18 and then drove to the meeting with CS2.

19       43. At approximately 5:23 p.m., the Nissan Frontier arrived at the meeting  
20 location. CS2 got into the Nissan Frontier. Investigators positively identified KLANDER  
21 as the driver of the Nissan. KLANDER drove the Nissan through the parking lot, then  
22 parked. CS2 got out of the Nissan at approximately 5:29 p.m.

23       44. Following the controlled buy, investigators met with CS2 at a pre-arranged  
24 location for debriefing. CS2 provided investigators with 29 “M 30” pills. CS2 was then  
25 searched by investigators; no additional contraband was located. According to CS2,  
26 KLANDER said during their meeting that he had access to a “limitless” amount of pills  
27 he could sell to CS2. CS2 also told investigators that KLANDER was planning to get an  
28

1 additional supply of pills later around 6:00 p.m. A subsequent review of the audio  
2 recording from the controlled buy confirmed CS2's account of events.

3 45. After the controlled buy, investigators continued surveilling KLANDER's  
4 Nissan Frontier with assistance from the CBP helicopter and followed it to 4731 East  
5 Oregon Street. At around 6:18 p.m., the Nissan Frontier parked in front of the shop  
6 building at that address; no other cars were in the immediate vicinity. Shortly after, a  
7 second vehicle arrived at that address. The CBP helicopter observed the driver of the  
8 Nissan Frontier—although CBP could not identify the driver of the Nissan from the air,  
9 investigators on the ground had previously identified the driver as KLANDER—and the  
10 driver of the second vehicle going into the shop building located at 4731 East Oregon  
11 Street together and staying there for about ten minutes. At approximately 6:47 p.m., the  
12 two came out of the building, and KLANDER's Nissan Frontier and the second vehicle  
13 left the area. Investigators on the ground observed the second vehicle shortly after it left  
14 4731 East Oregon Street and identified it as SALAS's Toyota Tundra.

15 46. At approximately 6:49 p.m., CS2 contacted investigators by phone and told  
16 them that KLANDER had called and text messaged CS2 from (360) 927-7237 and said  
17 that he now had additional pills to sell. Investigators subsequently met with CS2 and  
18 confirmed the text messages exchanged between CS2 and KLANDER. Investigators  
19 decided not to conduct another controlled purchase utilizing CS2 that night. Surveillance  
20 was terminated for that night.<sup>3</sup>

#### 21 **H. Further Surveillance of SALAS and KLANDER on March 30, 2020**

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24  
25 <sup>3</sup> In April, 2020, while investigators were conducting surveillance on KLANDER, they saw CS2 meet with  
26 KLANDER without their direction. On the same day, investigators contacted CS2 and confronted CS2 about their  
27 observation. CS2 initially denied meeting with KLANDER, but soon admitted that she/he had met with KLANDER  
28 earlier that day and that she/he had been using drugs while being signed up as a confidential source for the Whatcom  
Gang and Drug Task Force (WGDTF). Later the same day, investigators saw CS2 meet with KLANDER for a  
second time without their direction. CS2 was no longer utilized by investigators after this day, except for one  
occasion to introduce an undercover officer to KLANDER, as described further below.

1        47. On February 24, 2020, Magistrate Judge Mary Alice Theiler issued cell  
2 phone tracking warrants and pen-trap orders for (360) 303-2184 (SALAS's cell phone)  
3 and (360) 927-7237 (KLANDER's cell phone). On the same date, Magistrate Judge  
4 Theiler also issued a vehicle-tracking warrant for KLANDER's Nissan Frontier and  
5 SALAS's Toyota Tundra.<sup>4</sup>

6        48. On March 30, 2020, investigators conducted digital and physical  
7 surveillance of SALAS and KLANDER. Investigators observed remotely accessible  
8 video footage of 4731 East Oregon Street. At 11:22 a.m. investigators observed, via the  
9 remotely accessed recorded video, SALAS arriving at 4731 East Oregon Street in his  
10 Toyota Tundra. SALAS parked and accessed the shop building at that address. The  
11 Toyota Tundra remained at that address until 3:08 p.m. Through remotely accessed  
12 recorded video, investigators observed SALAS get into the Toyota Tundra and leave  
13 4731 East Oregon Street.

14        49. At 3:24 p.m., using judicially authorized phone tracking, investigators  
15 observed a cell phone ping location on SALAS's cell phone. The location data indicated  
16 that SALAS's phone was in the area of 1810 Cornwall Avenue, Bellingham, Washington.  
17 At 4:10 p.m., investigators physically observed SALAS in the parking lot of 1810  
18 Cornwall Avenue. SALAS appeared to be working on his truck in front of a stereo store.

19        50. At 4:19 p.m., investigators saw KLANDER's Nissan Frontier arrive and  
20 park in the parking lot of 1810 Cornwall Avenue. Investigators soon identified  
21 KLANDER as the driver. Investigators saw SALAS walk over to KLANDER's Nissan  
22 Frontier and get into the passenger seat. SALAS and KLANDER remained there for  
23 about ten minutes. SALAS then returned to his Toyota Tundra and drove away from the  
24 area a few minutes later. KLANDER left the area at 4:30 p.m.

25  
26  
27 <sup>4</sup> As discussed above, these warrants and pen/trap orders were renewed on April 8, 2020, by Chief Magistrate Judge  
28 Brian A. Tsuchida, and again on May 18, 2020 by Magistrate Judge Mary Alice Theiler, extending the DEA's  
authority to use these investigative tools.



1        51. Investigators were unable to follow SALAS. Using a judicially authorized  
2 vehicle tracker affixed to KLANDER's Nissan Frontier, investigators observed that the  
3 Nissan was in the area of a Safeway grocery store at 1275 East Sunset Drive in  
4 Bellingham at 4:38 p.m. Shortly after, investigators physically observed KLANDER  
5 meet with two people in the grocery's parking lot. Based on investigators' training and  
6 experience, KLANDER's interactions with these people were consistent with drug  
7 transactions. Among other things, investigators witnessed KLANDER conduct a hand-  
8 to-hand exchange through a vehicle window. KLANDER drove away from the parking  
9 lot at 4:44 p.m.

10        52. At 5:18 p.m., via remotely accessible recorded video surveillance,  
11 investigators saw SALAS's Toyota Tundra return to the shop building at 4731 East  
12 Oregon Street, the suspected stash house location discussed above. A man matching  
13 SALAS's description was driving the Toyota Tundra.

14 **I. Undercover Purchase from KLANDER on April 17, 2020**

15        53. On April 17, 2020, an undercover officer (hereinafter "UC") contacted  
16 KLANDER at (360) 927-7237 through CS2's introduction and arranged to purchase 100  
17 pills from KLANDER. The UC met KLANDER at a business parking lot located in  
18 Bellingham, Washington. Investigators observed KLANDER get into the UC's vehicle,  
19 where KLANDER provided the UC with 100 "M 30" pills. These pills were consistent in  
20 appearance with the pills previously provided by KLANDER during the controlled  
21 purchases described above. The UC paid \$2,000 for the 100 pills. KLANDER told the  
22 UC about his sources of supply and the UC and KLANDER discussed possible further  
23 drug transactions.

24 **J. Surveillance of KLANDER and SALAS on May 6, 2020**

25        54. On May 6, 2020, investigators conducted surveillance on KLANDER and  
26 SALAS. On that date, the UC exchanged a series of text messages with KLANDER at  
27 (360) 927-7237 regarding the future purchase of fentanyl-laced pills, followed by a  
28 recorded phone call at approximately 3:20 p.m. During the call, KLANDER said that he

1 had recently spoken with his source of supply. KLANDER stated his source of  
2 supply was currently in the Bellingham area, and they would be meeting up soon.  
3 Investigators observed that the GPS location for SALAS's cell phone (360-303-2184)  
4 was in the area of Bellingham, Washington, at approximately 3:08 p.m. Pen register data  
5 between KLANDER's cell phone and SALAS's cell phone showed that a phone call  
6 lasting approximately five minutes between the two numbers was made at approximately  
7 2:58 p.m. that day.

8 55. At approximately 3:26 p.m, KLANDER and the UC talked on the phone.  
9 During the call, KLANDER told the UC that "My guy up here . . . the one I don't have to  
10 do any travelling for . . . my original like first person I've ever had" began dealing drugs  
11 again. KLANDER told the UC that he was going to meet his source of supply soon.

12 56. At about 3:34 p.m., investigators observed KLANDER leaving the area of  
13 his apartment at 1511 North State Street, Bellingham, Washington, driving a Honda  
14 Accord bearing license plate WA/BBT3017, registered to Josephine Toohey at 1511  
15 North State Street, Apartment 253, Bellingham, Washington. Investigators briefly lost  
16 visual of KLANDER, but located the Honda Accord parked near SALAS's Toyota  
17 Tundra pickup truck in the parking lot of a Fred Meyer's grocery store in Bellingham,  
18 Washington a few minutes later. Investigators observed KLANDER and SALAS seated  
19 together in SALAS's truck, speaking to one another. SALAS and KLANDER remained  
20 in the vehicle for approximately ten minutes before separating ways.

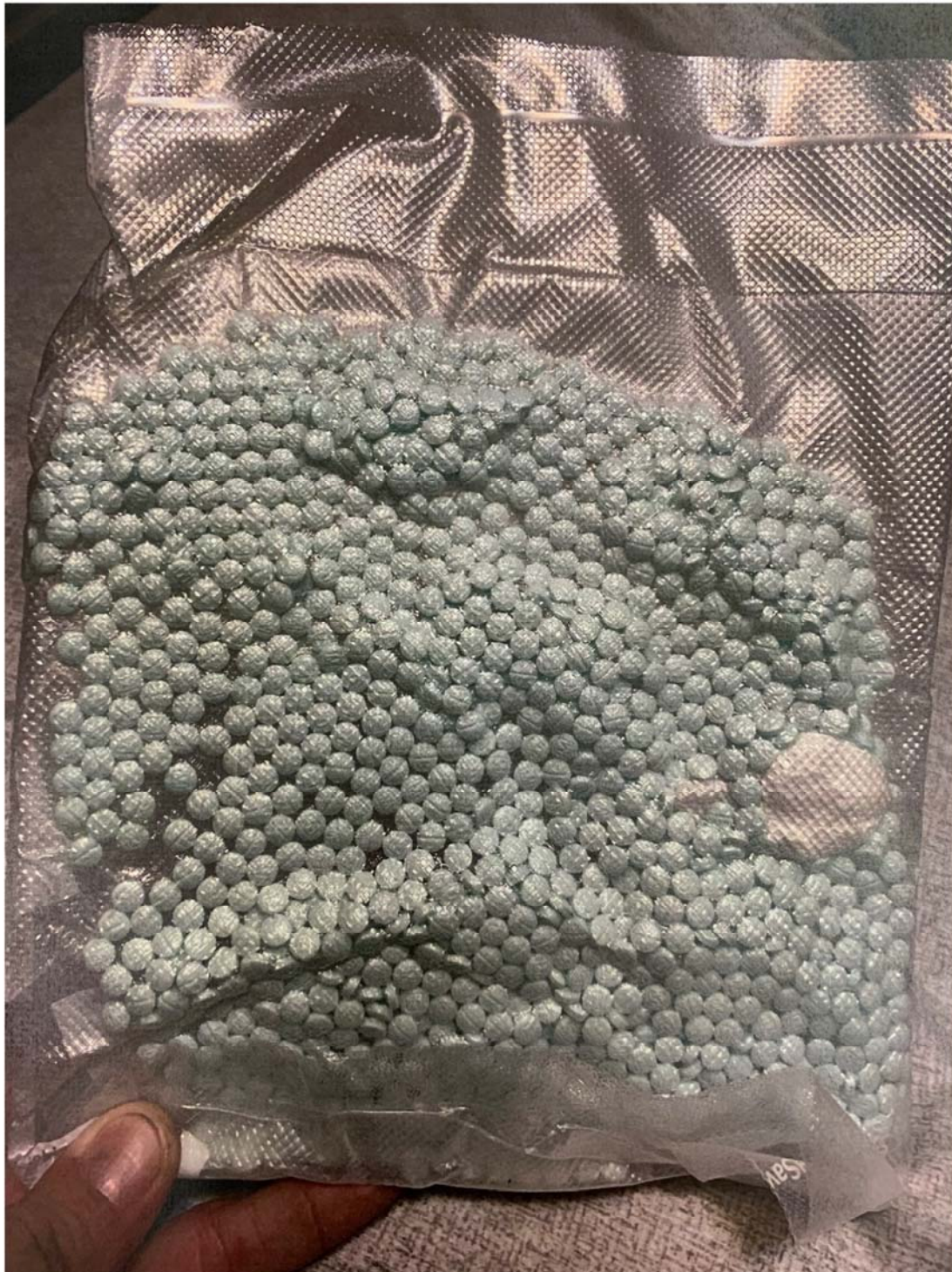
21 57. At approximately 8:59 p.m., KLANDER and the UC spoke on the phone  
22 again. KLANDER told the UC that he met his source of supply earlier in the day and  
23 that he already had the product. KLANDER told the UC that the product was delivered  
24 by someone from California and that his source of supply did not provide as many pills as  
25 KLANDER wanted. KLANDER also told the UC that he was going to get more product  
26 the next week.

1 **K. Apple iCloud Search Warrant**

2 58. On April 3, 2020, Chief Magistrate Judge Brian A Tsuchida signed a search  
3 warrant for data associated with KLANDER and SALAS's iCloud accounts. In May  
4 2020, investigators received a return from Apple.

5 59. Among other things, investigators observed a geotagged photo that depicted  
6 a large quantity of what appear to be blue "M 30 pills" in a vacuum sealed bag. The  
7 photo was geotagged with GPS coordinates of N 48,48,6.41/W122,24,7.81, which  
8 corresponds to 1656 Mount Baker Highway, Bellingham, Washington. The photo showed  
9 the time and date stamp of 3/21/2020 at 7:31 p.m. This is the photo:





60. In SALAS's iCloud account, investigators also found the following messages between SALAS's cell phone and KLANDER's cell phone. In these messages, SALAS appears to tell KLANDER that SALAS's "shop" was broken into and that

SALAS had some items stolen. Below is a selection of messages between SALAS and KLANDER in which they discuss a recent burglary at SALAS's "shop":

3/12/20 9:29 AM	SALAS	Hey someone broke into the shop last week and I'm pretty sure I know who I'm looking for. U remember the guy who's house u been to over by sunset.
3/12/20 9:30 AM	KLANDER	Yep, I was wondering what was up with u.
3/12/20 9:31 AM	SALAS	Didn't lose much but they pryed on my car and shit super pissed. Will have to give u more details later but. I'm looking for that guy if u see him let me know. I've got all the footage
3/12/20 9:31 AM	KLANDER	I kinda had some bad luck myself, but probably not as bad as urs. What do u wanna do about it
3/12/20 9:32 AM	SALAS	I'm going to find him. Half of Bellingham is looking for him
3/12/20 9:32 AM	KLANDER	That's fucked, did more damage than the worth. I was wondering what the hell happened. Anyways, let's meet up sometime

61. Relatedly, during a controlled purchase between the UC and KLANDER on May 12, 2020 (described in more detail below), KLANDER told the UC that KLANDER's source of supply had recently been robbed and that one of his source's customers, who had built up a debt to the source, had told someone else where the source's "jackpot" was, which led to the robbery.

62. Based on my training and experience, as well as the circumstances described above, I believe that SALAS's "shop" that was burglarized was his East Oregon Street stash location.

#### **L. Identification of SALAS's Potential Source in Mexico**

63. During the review of SALAS's iCloud data, investigators located communications between SALAS and +52 323-126-0644 on WhatsApp, a messaging application. The communications were a combination of saved voice recordings and text messages. The +52 323 prefix indicates that the phone number is from Jalisco, Mexico.



The following is an approximate transcription of the voice recordings and text messages exchanged between SALAS and +52 323-126-0644:

Time/Date	User	Mode	Content
3/1/20 2:20 PM UTC	+52 323 126 0644	Audio	How's it going up there, there big dog?
3/1/20 10:43 PM UTC	SALAS	Audio	Good, be done building a house, um, have, yeah, we just uh we'll have uh, just a little, probably about four percent of the roof left to do, and uh, yeah, this job's done, so, um, yeah, probably, uh, probably yeah, like, Tuesday or Wednesday, all the way out, so we'll have our place ready to go.
3/1/20 10:45 PM UTC	SALAS	Audio	How's your mom's house going down there?
3/2/20 5:16 AM UTC	+52 323 126 0644	Audio	Oh nice man, yeah that way we can get started on the next project, and yeah, uh, my mom's house, is uh, doing good, you know, it's huge, you know what I'm saying, so it's gonna take it a little longer to build then most of the other houses around, but yeah, hell yeah man, that's good.
3/2/20 3:13 PM UTC	SALAS	Audio	Alright, um yeah, let me get a hold of you probably be, probably Wednesday or something.
3/2/20 3:23 PM UTC	+52 323 126 0644	Audio	Cool man

1				
2	3/12/20 2:46	+52 323 126	Audio	How ya doing up there man? So I uh, need to
3	AM UTC	0644		talk to you about, uh, the buttons. If you gonna
4				be able to rack up some, uh, some cash for us,
5				when we drop off, so we can pick up, you
6				know what I'm saying, at least ah, well as
7				much as you can, you know what I mean, but
8				at least five grand, you know what I'm saying?
9	3/12/20 8:57	+52 323 126	Audio	Are you almost out, or what's up man?
10	PM UTC	0644		
11	3/12/20 8:58	+52 323 126	Text	??
12	PM UTC	0644		
13	3/12/20 2:57	SALAS	Audio	Hey I'm dealing with some shit, I'll get back
14	AM UTC			to you tomorrow
15	3/13/20 4:17	+52 323 126	Text	Ok
16	AM UTC	0644		
17				
18	3/15/20 3:02	+52 323 126	Text	What's up bro
19	AM UTC	0644		
20	3/15/20 3:37	+52 323 126	Audio	The reason why I was trying to figure out
21	AM	0644		what's up, is because tomorrow some of the
22				shit's gonna be coming in, you know what I'm
23				saying, so I'm trying to figure out how many
24	3/15/20 11:43	+52 323 126	Text	Call me when you get a chance
25	PM	0644		
26				
27				
28				



1	3/19/20 3:54	+52 323 126	Text	I got a 6000 square foot project too talk to you
2	AM UTC	0644		about
3	3/20/20 3:31	+52 323 126	Text	??
4	PM UTC	0644		
5	3/20/20 3:32	+52 323 126	Text	Remember we talked about consistency
6	PM UTC	0644		
7	3/21/20 2:23	SALAS	Audio	Yeah someone broke into my place man, just
8	AM UTC			had to take care of that shit, um, but uh, yeah,
9				fuck I was out a month ago, so, ah, I don't
10				know, I was just taking a break, man, for a
11				second after fucking someone broke in and
12				shit like, fuck, if it was any other time man,
13				fuck the loss would've just have been way too
14				much to take, to handle, you know what I
15				mean, so I don't know, I just took a step back
16				for a minute, yeah I was out, fucking, I was
17				out a while ago, but I just had what was left,
18				there wasn't much of a loss, but, but it
19				could've been, it could've been big
20	3/21/20 2:23	SALAS	Audio	With the way shit is right now, with the
21	AM UC			fucking coronavirus and shit up here, I don't
22				even know

64. Based on my training and experience, I know that drug dealers often use coded language to discuss drug transactions. I believe that SALAS and the user of +52 323 126 0644 were using a similar tactic in these exchanges. For example, the "6000 square foot project" could be referring to the number of fentanyl-laced pills to be

1 transacted, while the phrase “four percent of the roof left” could be referring to the  
2 amount of drug supply left. Similarly, the construction job or project that were mentioned  
3 could be referring to procuring, shipping, and selling a batch of fentanyl-laced pills.

4 65. In addition, based on the evidence described above, I believe that the break-  
5 in SALAS was discussing in his WhatsApp communication was the break-in that had  
6 occurred at his East Oregon Street stash location. Based on my training and experience,  
7 drug dealers generally do not talk about their stash locations with others unless they are  
8 in the drug trafficking business together.

9 **M. Undercover Purchase from Troy KLANDER on May 12, 2020**

10 66. Leading up to and on May 12, 2020, the UC communicated with  
11 KLANDER at (360) 927-7237 and made an arrangement to purchase fentanyl-laced pills.  
12 At about 10:10 a.m. on May 12, 2020, the UC met KLANDER at a business parking lot  
13 located in Bellingham, Washington. KLANDER arrived at the deal location in his Nissan  
14 Frontier. The UC requested to purchase 150 pills from KLANDER. KLANDER told the  
15 UC that KLANDER would have to go to his source of supply to fulfil the UC’s order.  
16 KLANDER directed the UC to go the Silver Beach grocery store, located at 609  
17 Northshore Drive, Bellingham, Washington, and wait for KLANDER’s return with the  
18 pills.<sup>5</sup>

19 67. Investigators followed KLANDER in his Nissan Frontier to 4731 East  
20 Oregon Street, where he arrived at about 10:32 a.m. KLANDER was observed, via  
21 remote live video monitoring, parking his Nissan Frontier in front of the shop at that  
22 address. Prior to the meeting between KLANDER and the UC, investigators had also  
23 observed SALAS arrive at the shop, via remote live video monitoring, at approximately  
24 9:45 a.m., driving his Toyota Tundra. The video footage showed that KLANDER  
25 remained parked near the shop for approximately five minutes.<sup>6</sup> KLANDER’s Nissan  
26

27 <sup>5</sup> It was during this meeting when KLANDER told the UC about the burglary that had happened to his source.

28 <sup>6</sup> Due to the angle of the camera, investigators could only see that the vehicle was parked at this location, and could not see the interaction between KLANDER and SALAS.

1 Frontier then left 4731 East Oregon Street at about 10:37 a.m. Investigators followed  
2 KLANDER directly to the Silver Beach Grocery store, where KLANDER met with the  
3 UC and sold 150 "M 30" pills in exchange for pre-recorded DEA buy funds. The UC  
4 then told KLANDER that he was going to sell the pills he was receiving, and would have  
5 money for an additional order of pills very soon.

6 68. Following this UC buy, investigators followed KLANDER back to 4731  
7 East Oregon Street. According to the remote live video monitoring, KLANDER arrived  
8 there at approximately 10:49 a.m. Based on my training and experience, I believe that  
9 KLANDER went back to 4371 East Oregon Street to transfer the money he had just  
10 received from the UC to SALAS.

11 69. While KLANDER was still at 4731 East Oregon Street, the UC called  
12 KLANDER and ordered an additional 145 pills. The UC and KLANDER agreed to meet  
13 again at the Silver Beach grocery store. Investigators observed, via remote live video  
14 monitoring, KLANDER leaving 4731 East Oregon Street at approximately 11:08 a.m. in  
15 Nissan Frontier. Investigators followed KLANDER back to the Silver Beach grocery  
16 store, where KLANDER met with the UC to complete the second transaction.  
17 KLANDER provided the UC with 145 "M 30" pills in exchange for additional pre-  
18 recorded DEA buy funds. After KLANDER's second meeting with the UC, investigators  
19 followed KLANDER from the Silver Beach grocery store to a nearby parking lot and gas  
20 station located at 1480 Electric Ave, Bellingham, Washington.

21 70. At about 11:21 a.m., investigators on surveillance observed SALAS's  
22 Toyota Tundra leaving the area of 4731 East Oregon Street. Investigators followed the  
23 Toyota Tundra to 1480 Electric Avenue, where KLANDER was waiting. Investigators  
24 saw KLANDER getting into the Toyota Tundra and meeting with SALAS briefly. Based  
25 on my training and experience, I believe that KLANDER was once again handing over to  
26 SALAS the money he had just received from the UC during this second meeting.  
27 SALAS and KLANDER separated ways after a few minutes.  
28



71. Following these UC buys, investigators collected the pills from the UC and processed them for lab testing. One of the investigators handling the pills was wearing plastic gloves and noticed “M 30” marks imprinted on the gloves. Based on my training and experience, I believe that these marks were created by the remaining residues of fentanyl and/or other cutting agents typically mixed with fentanyl from the surface of the counterfeit pills purchased from KLANDER.



**N. Arrest of KLANDER and SALAS on May 28, 2020**

72. On May 26, 2020, the Honorable Mary Alice Theiler issued a warrant authorizing the search of, among other places, 1656 Mt Baker Highway (residence owned by KLANDER’s father), 1511 North State Street (KLANDER’s apartment), 4731 East Oregon Street (SALAS’s stash location), and 4337 Squalicum Lake Road (SALAS’s residence).

1       73. Later the same day, the UC spoke and subsequently met with KLANDER  
2 during another controlled purchase of suspected fentanyl-laced pills. KLANDER told the  
3 UC that his normal source of supply was low on the fentanyl-laced pills and that  
4 KLANDER and his source were expecting to receive thousands of pills from California  
5 in the following week.

6       74. On May 28, 2020, the DEA, along with its local law enforcement partners,  
7 executed the aforementioned search warrant and arrested KLANDER and SALAS. At the  
8 time of the service of the search warrant at 4337 Squalicum Lake Road (SALAS's  
9 residence), SALAS barricaded himself inside of the house and refused to come out  
10 despite multiple commands from law enforcement. After a stand-off that lasted about  
11 thirty minutes, SALAS finally came out of the residence and was taken into custody.  
12 Inside the residence, investigators located a large amount of US Currency, which was  
13 visually estimated to be around \$30,000.00. Investigators also located smaller amounts of  
14 suspected heroin and suspected cocaine in the residence. Based on my training and  
15 experience, I suspect that SALAS destroyed and/or concealed the evidence of his drug  
16 trafficking activities during the standoff.

17       75. In a subsequent interview with KLANDER after *Miranda*, KLANDER  
18 admitted to selling fentanyl-laced pills.

19 //

20 //

21 //

**CONCLUSION**

76. Based on the foregoing, I respectfully submit that there is probable cause to believe that Troy KLANDER and Zackary SALAS committed the offense of conspiracy to distribute fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.



Christopher VandenBos, Complainant  
Task Force Officer  
Drug Enforcement Administration

Based on the Complaint and Affidavit, to which the above-named agent provided a sworn statement attesting to the truth of the contents of such, the Court hereby finds that there is probable cause to believe the Defendants committed the offenses set forth in the Complaint.

Dated this 29th day of May, 2020.



Mary Alice Theiler  
United States Magistrate Judge