

Magistrate Judge Paula L. McCandlis

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7 UNITED STATES DISTRICT COURT FOR THE
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 JOSE EDUARDO GARNICA,
14 LAUREN MALINA WILSON,

15 Defendant.

CASE NO. MJ22-324

COMPLAINT for VIOLATION

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

16
17 BEFORE, the Honorable Paula L. McCandlis, United States Magistrate Judge,
18 U. S. Courthouse, Seattle, Washington.

19 The undersigned complainant being duly sworn states:

20 **COUNT ONE**

21 **(Conspiracy to Manufacture and Distribute Fentanyl)**

22 Beginning at a time unknown, and continuing until July 21, 2022, in Snohomish
23 County, within the Western District of Washington, and elsewhere, JOSE EDUARDO
24 GARNICA, LAUREN MALINA WILSON, and others known and unknown, did
25 knowingly and intentionally conspire to manufacture, possess and distribute controlled
26 substances, including: N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide
27 (Fentanyl)], a substance controlled under Title 21, United States Code.
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1 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C)
2 and 846.

3 **COUNT 2**

4 **(Possession of a Controlled Substance with Intent to Distribute)**

5 On or about July 21 in Snohomish County, within the Western District of
6 Washington, JOSE EDUARDO GARNICA and LAUREN MALINA WILSON did
7 knowingly and intentionally possess, with the intent to distribute, and aid and abet the
8 possession of, with the intent to distribute, a controlled substance, including: N-phenyl-
9 N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl)], a substance controlled
10 under Title 21, United States Code.

11 All in violation of Title 21, United States Code, Sections 841(a)(1) and
12 841(b)(1)(C), and Title 18, United States Code, Section 2.

13 And the complainant states that this Complaint is based on the following
14 information:

15 I, JENNIFER HINCKLEY, being first duly sworn on oath, depose and say:

16 **AGENT BACKGROUND AND INTRODUCTION**

17 1. I am a Special Agent with Homeland Security Investigations. I am currently
18 assigned to the Blaine, Washington office of the Assistant Special Agent in Charge, and
19 have been so for the past 18 years. I have been employed by HSI since 2003. I am
20 assigned to the Skagit County Interlocal Drug Enforcement Unit (SCIDEU) investigating
21 drug trafficking organizations and street level organizers operating in the Western
22 District of Washington. I support the state and local mission full time and am also in
23 place to assist and lead on any federal level cases.

24 2. My duties and experience as a Special Agent include the enforcement of
25 federal criminal statutes, including statutes related to drug offenses, firearm offenses,
26 money laundering offenses, cross border smuggling, and other criminal offenses. As a
27 Special Agent with HSI, I am authorized by law to conduct investigations, execute search
28 warrants, and make arrests for federal felony offenses.

1 3. I have completed the HSI Criminal Investigator Training Program at the
2 HSI Federal Law Enforcement Training Center in Glynco, Georgia. I have participated in
3 numerous narcotics investigations at both the local and federal level, and I have
4 participated in the execution of local and federal search warrants. As a result, I have
5 become familiar with methods of operation of drug traffickers and organizations. As a
6 Special Agent with HSI, I investigate violations of federal controlled substance laws,
7 including the trafficking and distribution of cocaine, methamphetamine, heroin, fentanyl,
8 marijuana, and other dangerous drugs.

9 4. I have interviewed numerous drug dealers, drug users, and knowledgeable
10 confidential sources about the lifestyles, appearances, and habits of drug dealers and
11 users. I have become familiar with the way narcotics traffickers smuggle, package,
12 transport, store, and distribute narcotics, as well as how they collect, conceal, and launder
13 drug proceeds. I am also familiar with the way narcotics traffickers use telephones,
14 cellular telephone technology, internet, telephonic and computer applications, coded
15 communications, slang-filled conversations, false and fictitious identities, and other
16 means to facilitate their illegal activities and mislead law enforcement investigations. I
17 have observed and have had discussions with other law enforcement personnel about the
18 packaging and preparation of narcotics, the methods of illegal narcotics traffickers, and
19 the security measures that narcotics traffickers often employ. I have examined narcotics
20 trafficker's customer lists, pay/owe ledgers and other records maintained by traffickers,
21 and other documentation related to narcotics trafficking. I have also examined
22 documentation of various methods by which cocaine, methamphetamine, heroin,
23 fentanyl, marijuana, and other illicit drugs are smuggled, transported, and distributed. I
24 have participated in numerous hours of surveillance of narcotics traffickers. During
25 surveillance, I have personally observed narcotics transactions, counter surveillance
26 techniques, and the ways in which narcotics traffickers conduct clandestine meetings.
27 Throughout my career in law enforcement, I have received training from, worked with,
28 spoken with, and gleaned knowledge from several experienced federal, state, local, and

1 international narcotics officers concerning the use of cell phones and mobile applications
2 by drug traffickers to facilitate drug trafficking.

3 5. The facts set forth in this affidavit arise from my personal and direct
4 participation in the investigation, my experience and training as an HSI Special Agent,
5 my conversations with witnesses and other law enforcement personnel, including
6 consultations with U.S. Postal Inspection Service Postal Inspector Terry Stinson, and FBI
7 Special Agent Andrew Weathers, who both have extensive experience in investigating
8 narcotics trafficking, as well as other investigators participating in this and related
9 investigations, and my review of relevant documents and reports. I have not included
10 every fact known to me or other investigative personnel concerning this investigation.
11 My specialized training and experience in drug investigations, as well as the assistance
12 and input of experienced fellow investigators, form a basis for my opinions and
13 conclusions, which I drew from the facts set forth herein.

14 6. As set forth below, there is probable cause to believe that defendants JOSE
15 EDUARDO GARNICA and LAUREN MALINA WILSON are conspiring between
16 themselves and with others to manufacture and distribute pills that appear to be
17 prescription opiate pills, but in reality contain fentanyl. There is also probable cause to
18 believe that both defendants possessed fentanyl with the intent to distribute it as part of
19 the conspiracy.

20 SUMMARY OF PROBABLE CAUSE

21 Information on M30 Fentanyl Pills

22 7. "M30" pills (also referred to as blues, Mexican Blues, Ms, 30s, Oxy, etc.)
23 are round, typically light blue in color, and stamped with the letter "M" within a box on
24 one side, and with the number "30" on the other side. I know, based on my training and
25 experience, that these counterfeit pills are designed to look like legitimate commercially
26 made and distributed Oxycodone HCl 30 mg pills. Instead of containing oxycodone,
27 these counterfeit pills are manufactured to contain fentanyl and/or fentanyl analogues by
28 drug trafficking organization members (without chemistry or pharmacy degrees), in

1 unregulated ad hoc laboratories, which have been located throughout Washington State
2 and globally for the past several years. Currently, “super labs” in remote locations or
3 foreign countries (often Mexico) supply bulk quantity M30 pills. However, the ready
4 availability of equipment, including pill presses, as well as the fentanyl, fentanyl
5 analogues and/or the precursor chemicals used to make fentanyl are relatively easy for
6 the drug trafficking organizations to obtain from China or elsewhere abroad. The ready
7 availability of the components used to make “M30” pills enables traffickers to
8 manufacture the pills themselves locally. Local manufacturing means that the
9 organizations no longer have to risk being caught with the final product in bulk as it is
10 transported to this District for distribution.

11 8. I know, based on my training and experience, that counterfeit pills are often
12 less durable than pharmaceutical-grade pills manufactured in legitimate laboratories. I
13 also know, based on my training and experience, that drug users often break these
14 counterfeit pills containing fentanyl and/or fentanyl analogues for personal consumption
15 due to their inconsistent, and often highly potent, dosage so as not to overdose. Drug
16 users will typically “foil smoke” the pill. They place a piece of the pill or a whole pill
17 onto a bit of foil and heat the underside, causing the desired narcotic vapor properties to
18 rise, which are then inhaled with a “tooter” or straw. Using this method has eliminated
19 the need for hypodermic needles, syringes, and the greater risk of overdose that came
20 with heroin.

21 9. I have learned through participating in many narcotic seizures, arrests, and
22 interviews that these pills have become the preferred form of consumption/use for many
23 opioid addicts and the preferred form of product for clandestine manufacturers and
24 suppliers. The doses are stronger, cheaper, and easier to manufacture and conceal in bulk
25 than the previous varieties. These pills are responsible for numerous overdoses and
26 overdose deaths within the Pacific Northwest counties of Washington as well as
27 nationwide.

1 **Interception of Package from China with “M30” Pill Press Dies**

2 10. On June 17, 2022, U.S. Customs and Border Protection (CBP) officers
3 assigned to the Anti-Terrorism and Contraband Enforcement Team (AT-CET) inspected
4 a parcel at the Los Angeles International Mail Facility (IMF) Centralized Examination
5 Station (CES) warehouse, which was addressed to Jose GARNICA at 4633 100th St NE,
6 Marysville, Washington 98270. The parcel was declared as having come from
7 SUNSHINE at Building 74 Yangguang Hundred Houihai, Changsha, China. The
8 package itself had a “third party” return address: Only Third-party Return Warehouse,
9 18555 Gale Ave (please contact vendor for refund) City of Industry, CA 91748. The
10 parcel arrived in the U.S. on Kalitta Air flight number 827 on June 14, 2022, from
11 Huanghua International Airport in China. It was manifested as “Furniture Parts” and
12 marked with a United States Post Office tracking number
13 92612927005554010023045181.

14 11. During the CBP officers’ customs inspection of the package, multiple pill
15 press die sets designed to be used with pill press machines were found inside. A pill
16 press die is used in a pill press to manufacture pills containing various controlled
17 substances together with an inactive ingredient, often called a binder. The die can be
18 made to press numbers, letters or other symbols into the pill for identification purposes.

19 12. In total there were 4 upper dies marked with an “M”, and 4 lower dies
20 marked with a “30”, as well as 4 tablet middle molds commonly utilized in motorized
21 desktop tablet press machines (which can produce 30-50 tablets a minute (3,000/hr)
22 according to lfatabletpresses.com) or a manual single punch tablet press.

23 13. A search of www.drugs.com reveals that a tablet stamped with an “M30” is
24 the officially recognized design of Oxycodone Hydrochloride 30 mg, National Drug
25 Code 00406-8530, supplied by Mallinckrodt Pharmaceuticals as a prescription only, and
26 is classified as a Schedule II controlled substance under the Controlled Substances Act.
27 These materials being shipped to GARNICA would enable 4 identical setups to create
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1 and manufacture “M30” stamped tablets which would have the potential to yield the
2 production of 120-200 tablets per minute (12,000/hr) on a small-scale tabletop press.

3 14. CBP seized the package and contents for violations of 19 USC
4 1595a(c)(2)(A), 21 USC 843(a)(5)—Merchandise Introduced Contrary to Law and
5 Prohibited Acts.

6 15. Further investigation in the CBP records system revealed at least six other
7 packages were sent to GARNICA at the Marysville address noted above since April
8 2022. These shipments were variously declared to be for “spare parts for carv” [sic],
9 “piston rod material iron” (on 3 occasions), “zinc alloy meat cutter”, and the latest
10 shipment of “furniture parts,” which was discovered to actually contain the pill press
11 dies. These shipments were from 3 different shippers.

12 16. Further research and surveillance showed that WILSON also resided at the
13 Marysville address, and had a vehicle registered to her at that address, a GMC Yukon.
14 Surveillance showed the Yukon and a blue BMW SUV parked at the Marysville address
15 in the days leading up to July 21, 2022.

16 17. Further checks showed that WILSON had a Washington State Concealed
17 Pistol License CPL and at least 12 firearms registered in her name. Records indicate that
18 WILSON purchase 11 of those firearms over a three-month period in 2020.

19 18. Lastly, I and other investigators did a preliminary financial investigation
20 into GARNICA. I know based on my training and experience that banks must comply
21 with the Bank Secrecy Act (BSA) regulatory requirements for currency transaction
22 reporting (CTR) under 31 U.S.C. § 5313 and 31 CFR 1010.311. A bank must file a CTR
23 for each transaction in currency (deposit, withdrawal, exchange of currency, or other
24 payment or transfer) of more than \$10,000 by, through, or to the bank. Upon reviewing
25 CTRs filed for GARNICA I discovered eleven (11) reports between 2021 and 2022
26 totaling \$169,347. In addition, there was one CTR associated with WILSON for
27 purchasing the Yukon using \$10,000 in cash. The financial investigation also showed
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1 that GARNICA had transferred over \$400,000 to Coinbase, a cryptocurrency exchange,
2 from three different bank accounts.

3 19. Based on the foregoing, and on other facts, I obtained federal search
4 warrants for the Marysville residence, the Yukon and the BMW from this Court on or
5 about July 15, 2022.

6 **Execution of the Search Warrants**

7 20. Investigators executed the search warrants on July 21, 2022. Due to safety
8 concerns officers announced their presence with the search warrant and asked GARNICA
9 and WILSON to exit the residence before beginning the search. Both GARNICA and
10 WILSON eventually responded to officer commands and exited the Marysville residence
11 after some delay, and were detained. Investigators then made entry into the house.

12 21. During the preliminary search of the residence itself, investigators
13 discovered a semiautomatic pistol with a mounted red dot sight. The pistol had a loaded
14 magazine seated, but no round in the chamber.

15 22. Upon entry into the garage, investigators found a pill press, industrial
16 mixers, drying racks, and other implements used to manufacture pills. In essence, the
17 garage contains a lab that can be used to manufacture the counterfeit M30 pills discussed
18 above. Powdered fentanyl can be extremely hazardous, so investigators backed out of the
19 residence and called in a trained hazardous materials (hazmat) team to continue the
20 search wearing protective gear.

21 23. During a preliminary hazmat walkthrough of the house, hazmat personnel
22 observed far more than 12 firearms and firearm cases that were anticipated to be in the
23 home.

24 24. As this complaint is being written, that search is ongoing. However, based
25 on my training and experience, the preliminary results more than establish that the
26 defendants were using the Marysville residence to manufacture fentanyl pills.

1 25. The hazmat team has examined the pill press, which is depicted in the
2 photograph below. The team performed a field test on powdered residue found on the
3 pill press, which returned a presumptive positive for the presence of fentanyl.




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18 26. The hazmat team also found and photographed empty shipping crates from
19 China, consistent with the CBP shipping records referred to above.



27. Both the BMW and the Yukon were also searched pursuant to the warrants issued by this court. In the Yukon, investigators found a pill bottle for Aleve, an over-the-counter pain killer. An undetermined number of blue M30 pills were located inside. In the BMW, investigators found approximately 10 loose M30 pills, together with a small baggy containing an undetermined number of M30 pills.

Based on the above facts, I respectfully submit that there is probable cause to believe that defendants JOSE EDUARDO GARNICA and LAUREN MALINA WILSON did knowingly and intentionally conspire to manufacture and distribute fentanyl, and did possess fentanyl with the intent to distribute it, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), 846 and Title 18, United States Code, Section 2.



JENNIFER HINCKLEY, Complainant
Special Agent, HSI

Based on the Complaint and Affidavit sworn to before me, and subscribed in my
Complaint- 10
United States v. Garnica, et al. MJ22-324

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 presence, the Court hereby finds that there is probable cause to believe the Defendant(s)
2 committed the offenses set forth in the Complaint.

3 Dated this 21st day of July, 2022.

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7 THE HON. PAULA L. McCANDLIS
8 United States Magistrate Judge
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UNITED STATES DISTRICT COURT

for the

Western District of Washington

United States of America

v.

JOSE EDUARDO GARNICA

Case No. MJ22-324

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer


YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) JOSE EDUARDO GARNICA,
who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
- Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

Conspiracy to Manufacture and Distribute Fentanyl, 21 U.S.C. §§ 841(a)(1) and 846
Possession of Fentanyl with Intent to Distribute, 21 U.S.C. § 841(a)(1)

Date: 07/21/2022



Issuing officer's signature

City and state: Seattle, Washington

Paula L. McCandlis, United States Magistrate Judge
Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: JOSE EDUARDO GARNICA

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: 02/21/1988

Social Security number: _____

Height: _____ Weight: _____

Sex: Male Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: Homeland Security Investigations - Special Agent Jennifer Hinckley, 360-410-7018

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

OCDETF Case Yes No

UNITED STATES DISTRICT COURT

for the

Western District of Washington

United States of America

v.

LAUREN MALINA WILSON

Case No. MJ22-324

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Defendant

ARREST WARRANT

To: Any authorized law enforcement officer


YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) LAUREN MALINA WILSON,
 who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
- Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

Conspiracy to Manufacture and Distribute Fentanyl, 21 U.S.C. §§ 841(a)(1) and 846
 Possession of Fentanyl with Intent to Distribute, 21 U.S.C. § 841(a)(1)

Date: 07/21/2022


 Issuing officer's signature

City and state: Seattle, Washington

Paula L. McCandlis, United States Magistrate Judge
 Printed name and title

Return

This warrant was received on *(date)* _____, and the person was arrested on *(date)* _____
 at *(city and state)* _____.

Date: _____

 Arresting officer's signature

 Printed name and title

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: LAUREN MALINA WILSON

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: 02/21/1988

Social Security number: _____

Height: _____ Weight: _____

Sex: Female Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: Homeland Security Investigations - Special Agent Jennifer Hinckley, 360-410-7018

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

OCDETF Case Yes No