

Magistrate Judge Tsuchida

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AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON DEPUTY  
BY

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

UNITED STATES OF AMERICA,  
Plaintiff

v.

STEVEN LLOYD SADLER and  
JENNA M. WHITE,  
Defendants.

NO. MJ13-487

COMPLAINT FOR VIOLATION

Title 21, United States Code, Sections  
841(a)(1) and (b)(1)(C), 846

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

The undersigned complainant being duly sworn states:

**COUNT 1**  
**(Conspiracy to Distribute Cocaine, Heroin, and Methamphetamine)**

Beginning at a time unknown, but within the last five years, and ending on or  
about July 31, 2013, in Bellevue, within the Western District of Washington, and  
elsewhere, STEVEN LLOYD SADLER, JENNA M. WHITE, and others known and  
unknown, knowingly and intentionally did conspire to distribute heroin, a substance  
controlled under Schedule I, Title 21, United States Code, Section 812, and cocaine and  
methamphetamine, substances controlled under Schedule II, Title 21, United States Code,  
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1 Section 812, in violation of Title 21, United States Code, Sections 841(a)(1) and  
2 (b)(1)(C).

3 All in violation of Title 21, United States Code, Section 846.

4 The undersigned complainant, Christopher Armstrong, being duly sworn, further  
5 deposes and states as follows:

6 **INTRODUCTION**

7 1. I am a Special Agent with the Department of Homeland Security, United  
8 States Immigration and Customs Enforcement (“ICE”), Homeland Security  
9 Investigations (“HSI”), and have been so employed since September of 2004. During my  
10 tenure with HSI and ICE, I have been assigned to the Border Enforcement Security  
11 Taskforce and have led and participated in numerous investigations and search warrants  
12 involving smuggling, drug trafficking, fraud, intellectual property theft, money  
13 laundering, child exploitation, and work-site enforcement. I am a graduate of the Federal  
14 Law Enforcement Training Center’s Criminal Investigator Training Program in  
15 Brunswick, Georgia, as well as the Immigration and Customs Enforcement Special Agent  
16 Training program. Because of my experience and training, I am familiar with common  
17 methods of investigating drug trafficking and have become familiar with methods of  
18 operation of drug traffickers and manufacturers, including, but not limited to: their  
19 methods of importing, exporting, storing, concealing, and packaging drugs; their methods  
20 of transferring and distributing drugs; their use of cellular telephones and telephone  
21 pagers; their use of counter-surveillance; and other methods of avoiding detection of law  
22 enforcement. I am a graduate of the University of Washington, where I received a  
23 Bachelor’s degree in Political Science and Laws, Societies and Justice. Prior to my  
24 employment with HSI/ICE, I served on active duty in the United States Air Force for four  
25 years.

26 2. The facts set forth in this Affidavit are based on my own personal  
27 knowledge; information obtained from other individuals during my participation in this  
28 investigation, including other law enforcement officers; interviews of cooperating

1 witnesses; review of documents and records related to this investigation; communications  
2 with others who have personal knowledge of the events and circumstances described  
3 herein; and information gained through my training and experience.

4 3. Because this Affidavit is submitted for the limited purpose of establishing  
5 probable cause in support of a criminal complaint, it does not set forth each and every  
6 fact that I, or others, have learned during the course of this investigation.

7 **SUMMARY OF PROBABLE CAUSE**

8 **A. The September 2012 Seizures**

9 4. On September 18, 2012, United States Postal Inspection Service Inspector  
10 Willyerd removed an express mail package from the mail stream during an interdiction  
11 targeting narcotics trafficking. The package was addressed to Ian Wilson, 2555  
12 Homestead Rd, #46, Santa Clara CA 95051. The sender was listed as Virginia  
13 Lillibridge, 20033 Birch Way, Lynnwood, WA 98036. Inspector Willyerd contacted the  
14 resident of the Lynnwood address who confirmed that no one by the name of Virginia  
15 Lillibridge lived at the address. The resident said he/she had no objection to his opening  
16 the package. A narcotics-detection dog alerted to the presence of controlled substances in  
17 the package. Inspector Willyerd opened the package without a warrant and located a  
18 substance that, based upon his training and experience, he believed to be heroin.<sup>1</sup> The  
19 heroin was hidden inside a birthday card and some scented markers.

20 5. On that same day, another inspector removed from the mail stream a  
21 separate package as part of the interdiction. At the time that the package was removed  
22 from the mail stream, the inspector was unaware of the package that is detailed above.  
23 The package was shipped from Edward Harlow, 17701 108th Ave SE, Suite, 416,  
24 Renton, Washington 98055, and addressed to Michael Shapiro, 2395 Earls Ct., Los  
25 Angeles, California 90077. A narcotics-detection dog alerted to the presence of narcotics  
26

27  
28 <sup>1</sup> Inspector Willyerd investigates cases involving narcotics that are shipped via U.S. mail. He  
has received specialized training regarding illegal narcotics.

1 in the package. The inspector applied for a search warrant for the package. The  
2 inspector noted in his search warrant affidavit that the package contained similar  
3 handwriting, was of the same size, and bore the same type of postage stamp, compared to  
4 the first package that the inspector had opened without a warrant. Law enforcement  
5 opened the second package pursuant to the warrant, and did not locate any narcotics in  
6 the package. Law enforcement did, however, locate \$3200 in cash.

7 6. On September 20, 2012, Inspector Willyerd obtained search warrants with  
8 respect to three additional packages that were pulled from the mail stream during the  
9 interdiction. The three packages were sent from Simone Phimpiela, 21131 Locust Way,  
10 Lynnwood, Washington 98036, and were addressed to individuals in Florida, California,  
11 and New York. The return address for the three packages did not exist. Moreover, a  
12 narcotics-detection dog alerted to the presence of narcotics in the packages. Inspector  
13 Willyerd noted in his search warrant affidavit that the packages contained similar  
14 handwriting, were of the same size, and bore the same type of postage stamp, compared  
15 to the packages mentioned above.

16 7. On September 21, 2012, another package was removed from the mail  
17 stream during the interdiction. The package was addressed from Mary Silverson, 15703  
18 48th Avenue West, Edmonds Washington 98026, and addressed to John Stapleton, 1204  
19 South Alfred Street, Apartment 221D, Alexandria, Virginia. Inspector Willyerd spoke  
20 with the resident at the Edmonds address who confirmed that no one named Mary  
21 Silverson lived at the address. The resident said he/she had no objection to Inspector  
22 Willyerd opening the package. A narcotics-detection dog alerted to the presence of  
23 controlled substances in the package. Inspector Willyerd opened the package without a  
24 warrant and located a substance that, based upon his training and experience, he believed  
25 to be heroin.

26 **B. Tracing the Sender of the \$3200 Package**

27 8. The return address for the package that contained the \$3200 in currency  
28 corresponded to a UPS store. The store provided Inspector Willyerd a copy of the

1 application for postal box 416. The name on the application was Edward Harlow. The  
2 person who opened the box provided an Illinois driver's license in this name. The  
3 driver's license listed an address of 1522 N. LA Cresta Avenue, Bellevue, Illinois 61604,  
4 and a date of birth of September 12, 1974. The person who opened the box also provided  
5 a vehicle insurance card using the same name and address.

6 9. The manager at the store told Inspector Willyerd that an "Edward Harlow"  
7 had opened a box at a separate UPS store located at 14201 SE Petrovisky Rd, #A3,  
8 Renton, Washington 98058. The manager at this store confirmed that the person who  
9 opened this box had provided the same driver's license and insurance card that was  
10 provided in connection with the other box.

11 10. Inspector Willyerd contacted other UPS stores to inquire whether "Edward  
12 Harlow" had any additional boxes. An Edward Harlow was associated with a box at the  
13 UPS store located at 325 Washington Ave S. #212, Kent, Washington 98032. The name  
14 "Aaron Thompson" also was associated with this box. "Aaron Thompson" had provided  
15 an Illinois driver's license that listed an address of 106 S. 9th Street, Bellevue, Illinois  
16 61604. "Aaron Thompson" also provided an insurance card from the same company as  
17 the card provided in the name of Edward Harlow. UPS advised Inspector Willyerd that  
18 "Aaron Thompson" also had rented a separate box in Tukwila using the same  
19 identification documents.

20 11. The Postal Inspection Service National Law Enforcement Communication  
21 Center confirmed for Inspector Willyerd that the two driver's licenses mentioned above  
22 were not valid licenses.

23 12. On November 20, 2012, the Riverton Heights Post Office contacted  
24 Inspector Willyerd about a package that was addressed to the Tukwila post box that was  
25 rented in the name of Aaron Thompson. The package was addressed to NW March  
26 Supply, c/o, A. Thompson, 100 Andover Park West Suite 150-303, Tukwila, Washington.  
27 The sender was from someone in Pakistan. A narcotics-detection dog alerted to the  
28 presence of narcotics in the package. Inspector Willyerd contacted me, and I opened the

1 package as part of a customs search. The package contained 900 suspected tablets of  
2 Alprazolam, which is a scheduled IV controlled substance. Agents removed the  
3 suspected narcotics and re-packaged the package with the hope of identifying the person  
4 who was to pick up the package. No one, however, came to retrieve the package.

5 **C. Riverton Heights Post Office Mailings and Subsequent Investigation**

6 13. In December 2012, Inspector Willyerd visited the Riverton Heights Post  
7 Office. Inspector Willyerd looked for packages that were similar to the \$3200 package  
8 and other packages that had been seized in September 2012. In particular, Inspector  
9 Willyerd looked for packages that contained similar handwriting and Express mail  
10 postage stamps compared to the other packages. He located one such package. He asked  
11 the clerks to alert him if they came across any subsequent packages that looked similar,  
12 and released the package back into the mail stream. On January 2013, Inspector Willyerd  
13 visited the Riverton Heights Post Office again. He again selected a package that looked  
14 like the packages that he had seized in September pursuant to the search warrants, and  
15 showed the package to the clerks. He also released this package to the mail stream.

16 14. Multiple clerks advised Inspector Willyerd that they recalled a blonde  
17 female purchasing Express mail postage stamps and dropping off packages that contained  
18 similar handwriting compared to the examples he had shown the clerks. Inspector  
19 Willyerd subsequently obtained a photograph of the female from the post office's  
20 surveillance system.

21 15. On December 17, 2012, a Riverton Heights Post Office employee advised  
22 Inspector Willyerd that she had seen the blonde female again at the post office. The  
23 employee noted that the female was driving an Audi bearing license plate number  
24 AGR4821 ("the Audi"). Department of Licensing records show that this car is leased to  
25 STEVEN SADLER at his residence in Bellevue, Washington.<sup>2</sup>

26  
27  
28 <sup>2</sup> Sadler and White both reside at this residence, a condominium. According to the lease  
agreement, Sadler is the tenant at the condominium. Additionally, Sadler's, Chase bank



1 16. Inspector Willyerd showed the driver's license photograph of SADLER and  
2 the surveillance photograph of the female to employees at the Renton and Tukwila UPS  
3 stores mentioned above. An employee in the Renton store identified SADLER as being  
4 "Edward Harlow." The employee did not recall ever seeing the female. Two employees  
5 in the Tukwila store identified SADLER as being "Aaron Thompson." The employees  
6 identified the female as picking up and dropping off packages, and that she described  
7 herself as Thompson's girlfriend.

8 17. Law enforcement subsequently conducted surveillance at SADLER's  
9 residence in Bellevue, and spotted the female. She was identified as JENNA WHITE,  
10 and she was seen driving the Audi on March 14, 2013.

11 18. In February 2013, the UPS store in Tukwila notified Inspector Willyerd  
12 about a package that was addressed to Aaron Thompson that had been delivered to the  
13 store. Inspector Willyerd obtained a search warrant for the package. The package  
14 contained a Sports Illustrated DVD. Nine grams of a substance that field tested positive  
15 for methamphetamine was secreted inside of the DVD case.

16 19. On March 11, 2013, Inspector Willyerd obtained a search warrant for a  
17 package that he removed from the mail stream during an interdiction that contained  
18 similar handwriting and postage compared to the packages that were seized in September  
19 2012 pursuant to the search warrants. The package was addressed to an individual in  
20 Alaska. The package contained 1.48 grams of a substance that field tested positive for  
21 heroin and 1.45 grams of a substance that tested positive for cocaine.

22  
23  
24  
25 accounts, Comcast Cable account, Verizon Cellular subscriber information, vehicle registration,  
26 as well as his Washington State Driver's License, all indicate that his residence is the  
27 condominium. According to Jenna White's Wells Fargo bank account, her vehicle registration  
28 and her Washington State Driver's License, this residence is her current address. She also has  
received several packages addressed to her at the residence. Furthermore, surveillance by law  
enforcement on multiple occasions, as well as GPS tracker history, indicate that Sadler and  
White currently live at the residence.

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1           20. On March 12, 2013, Inspector Willyerd obtained an anticipatory search  
2 warrant in connection with the delivery of the package. The recipient of the package  
3 subsequently agreed to cooperate in connection with the hope of reducing state felony  
4 charges. The recipient said he had purchased the drugs from "NOD" on the Silk Road.

5           21. The Silk Road is an online international marketplace that allowed its users  
6 to buy and sell controlled dangerous substances, including cocaine, and other contraband  
7 over the Internet.<sup>3</sup> The Silk Road is accessible via a website. The Silk Road has  
8 protected the anonymity of its users in several ways, including by using Tor technology.  
9 Tor is a system intended to enable online anonymity. Tor software routes the user's  
10 Internet traffic through a worldwide network of volunteer servers to conceal a user's  
11 location and Internet usage. Tor communications also are encrypted to conceal the  
12 contents of communications to all parties except for the intended recipient.

13           22. As a further measure to protect the anonymity of its users, the Silk Road  
14 requires all transactions to be conducted in Bitcoin. Bitcoin is an electronic,  
15 cryptographically based currency that had no association with banks or a government.  
16 Bitcoin is used because it is difficult to track and easy to move online.

17           23. Silk Road users have to create an account and a username. Silk Road users  
18 are instructed to use aliases as their username and never to disclose their true name.

19           24. NOD's Silk Road profile states that he has conducted numerous sales of  
20 illegal narcotics using the website. Indeed, his profile states that he is in the top one  
21 percent of sellers on the website. The profile states that NOD uses the United States  
22 Postal Service to transport the drugs. His profile lists cocaine, methamphetamine, and  
23 heroin for sale in various quantities.

24           25. On April 8, 2013, Inspector Willyerd directed the recipient of the Alaska  
25 package to purchase one gram of heroin and .5 grams of cocaine from NOD using the  
26 Silk Road website. On April 11, 2013, a package was seized in Alaska that was sent to  
27

28 <sup>3</sup> On or about October 2, 2013, the Silk Road website was seized by law enforcement.  
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1 the recipient. Postal records show that the package was shipped from Kenmore,  
2 Washington, on April 10, 2013. The package contained substances believed to be heroin  
3 and cocaine that were hidden inside the package.

4 26. On May 1, 2013, agents spotted the Audi parked at the Bellevue residence  
5 of STEVEN SADLER and JENNA WHITE. Agents spotted a BMW (the "BMW") at  
6 this residence as well. Department of Licensing records show that JENNA WHITE titled  
7 this car on April 23, 2013. The records show that she was gifted the car on March 29,  
8 2013.

9 **D. The Tracking Devices**

10 27. On May 9, 2013, Inspector Willyerd applied for and obtained warrants  
11 authorizing the installation of tracking devices for the Audi and the BMW. The tracking  
12 devices were installed on the vehicles on May 14, 2013. On June 19, 2013, I applied for  
13 and obtained warrants re-authorizing the use of the tracking devices. Thus, the tracking  
14 devices have been in operation on the vehicles from May 14, 2013, through the date of  
15 this application. Since May 14, 2013, agents have monitored the tracking devices on a  
16 remote, web-based program. Agents have observed the vehicles travel to numerous  
17 locations, including 38 post offices in the greater Seattle area:

18 **Post Offices Visited by the AUDI**

19 Bellevue Post Office; 11405 NE 2nd Pl. Bellevue, WA  
20 Bellevue Post Office; 15731 NE 8th St. Bellevue, WA  
21 Renton Post Office; 314 Williams Ave. S Renton, WA  
22 Lacey Post Office; 5815 Lacey Blvd. SE Olympia, WA  
23 Olympia Post Office; 900 Jefferson St. SE, Olympia, WA  
24 Tumwater Post Office; 200 Isreal Road SE Tumwater, WA  
25 Lakewood Post Office; 5409 100th St. SW, Lakewood, WA  
26 Tacoma Post Office; 320 Garfield St. South Tacoma, WA  
27 Spanaway Post Office; 16815 Pacific Ave. S, Spanaway, WA  
28 Puyallup Post Office; 13516 Meridian Ave. East, Puyallup, WA  
Issaquah Post Office; 400 NW Gilman Blvd. Issaquah, WA  
Federal Way Post Office; 31811 Pacific Highway South Federal Way, WA  
SeaTac Post Office; 15250 32nd Ave. S SeaTac, WA  
Renton Post Office; 4301 Northeast 4th St. Renton, WA

1 Puyallup Post Office; 204 2nd St. SW Puyallup, WA  
2 Federal Way Post Office; 1815 SW Campus Dr. Federal Way, WA  
3 Arlington Post Office; 3621 168th Street Northeast, Arlington, WA  
4 North Lakewood Post Office; 1610 172nd St. NE, North Lakewood, WA  
5 Woodinville Post Office; 17610 Woodinville Snohomish Road,  
6 Woodinville, WA  
7 Kirkland Post Office; 721 4th Ave. Kirkland, WA  
8 Kenmore Post Office; 6700 NE 181st St. Kenmore, WA

9 **Visited by the BMW**

10 Bellevue Post Office; 11405 NE 2nd Pl. Bellevue, WA  
11 Bellevue Post Office; 15731 NE 8th St. Bellevue, WA  
12 Mercer Island Post Office; 3040 78th Ave. SE Mercer Island, WA  
13 Seattle Post Office; 7724 35th Ave. NE  
14 Seattle Post Office; 2420 4th Ave. South Seattle, WA  
15 Seattle Post Office; 620 S Orcas St. Seattle, WA  
16 Seattle Post Office; 91 S Jackson St. Seattle, WA  
17 Seattle Post Office; 414 6th Ave. S Seattle, WA  
18 Federal Way Post Office; 1815 Southwest Campus Dr. Federal Way, WA  
19 Auburn Post Office; 11 3rd St. NW Auburn, WA  
20 Bellingham Post Office; 315 Prospect St. Bellingham, WA  
21 Bellingham Post Office; 104 West Magnolia St. Bellingham, WA  
22 Kingston Post Office; 10990 Northeast State Highway 104, Kingston, WA  
23 Indianola Post Office; 9200 Northeast Shore Dr. Indianola, WA  
24 Suquamish Post Office; 18485 Augusta Ave. NE Suquamish, WA  
25 Bellingham Post Office; 3150 Orleans St. Bellingham, WA  
26 Bainbridge Island Post Office; 271 Winslow Way E, Bainbridge Island,  
27 WA  
28 Bainbridge Island Post Office; 10355 Northeast Valley Road Bainbridge  
Island, WA  
University District Post Office; 1329 N 47th St. Seattle, WA  
Northgate Post Office; 11036 8th Ave. NE Seattle, WA

28. On June 4, 2013, Inspector Willyerd and I conducted mobile surveillance of WHITE in the BMW, shortly after observing on the tracker program that the vehicle had traveled to the post office located at 15731 NE 8th St. Bellevue, WA. We attempted to observe the vehicle at the post office, but it had already left the area. We caught up with the vehicle soon thereafter and observed that JENNA WHITE was driving the vehicle.

1           29.     At approximately 3:00 p.m., Inspector Willyerd and I returned to the post  
2 office located at 15731 NE 8th St. Bellevue. We requested that the parcels that had been  
3 dropped off at the post office's drop boxes be inspected. We discovered three Express  
4 mail parcels at the top of the bin from the outside drop box that matched JENNA  
5 WHITE's handwriting. All three parcels had the same "Grand Central Terminal" \$19.95  
6 stamp. The sender and recipient information are listed below.

7 Parcel 1:

8 From: Mandy Peters; 2929 76<sup>th</sup> Ave SE #408 Mercer Island, WA 98040

9 To: Bethesda Infotech; 4800 Hampden Lane #200 Bethesda, MD 20814

10 Parcel 2:

11 From: Mandy Peters; 2929 76<sup>th</sup> Ave SE #408 Mercer Island, WA 98040

12 To: Northern Tool Parts; 22 North Front St #201 New Paltz, NY 12516

13 Parcel 3:

14 From: Amy Wilson; 13752 36<sup>th</sup> Ave NE Seattle, WA 98125

15 To: Jaret Walker, C/O Ingram Haus; 1012 Elysian Fields, New Orleans, LA 70117

16           30.     According to the tracking data, the BMW had traveled to a separate post  
17 office in Bellevue shortly before arriving at the post office mentioned above.

18           31.     On June 12, 2013, Postal Inspector Brett Willyerd and I, acting in an  
19 undercover capacity, accessed the Silk Road website and conducted a controlled purchase  
20 of 3.5 grams of cocaine from "NOD." The purchase was made via a Confidential  
21 Informant's (CI) account.

22           32.     On the same day, agents conducted surveillance in an attempt to observe  
23 SADLER and/or WHITE drop off the control buy parcel at a post office or USPS  
24 collection box. While conducting surveillance, agents monitored the GPS tracker devices  
25 in an attempt to observe movement of the BMW or the Audi. While conducting the  
26 surveillance, I checked the CI's Silk Road account and discovered a message to the CI  
27 from NOD. The message written by NOD said that he was "sending from the road" and  
28 was utilizing a mobile device to access the Silk Road. Surveillance results were negative.  
Neither the BMW nor the Audi were observed leaving SADLER's Bellevue residence.

1 Moreover, the tracking data showed that the vehicles remained stationary. Inspector  
2 Willyerd placed a parcel watch at the processing plant in Tukwila, for the parcel to the  
3 CI.

4 33. On June 13, 2013, Inspector Willyerd was notified by a postal clerk that an  
5 express parcel addressed to the CI was identified at the Seattle processing plant.  
6 Inspector Willyerd retrieved the Express Mail parcel, which was shipped from West  
7 Hollywood, CA. Inspector Willyerd observed the handwriting on the label to be the same  
8 as SADLER's. We opened the package and found a sealed padded envelope with "3.5c"  
9 written on the top. Inside this envelope was a vacuum-sealed bag. Within the vacuum-  
10 sealed bag was another zip-lock baggie containing a substance that he recognized as  
11 cocaine, which was one solid piece/rock, rather than powder cocaine. We observed  
12 "3GTJ" written in black marker on the top of the zip-lock baggie. The cocaine and the  
13 small zip lock baggie together weighed four grams. The substance field tested positively  
14 for cocaine.

15 34. Between May 30, 2013 and June 17, 2013, STEVEN SADLER was  
16 suspected to be out of town, *i.e.* not in the Seattle/Bellevue area. In addition to the Silk  
17 Road message saying he was "sending from the road," and the abovementioned parcel  
18 being shipped from West Hollywood, his Audi did not move and a source of information  
19 (SOI) reported not seeing him at his residence during that timeframe.

20 35. According to the tracker program, SADLER's vehicle became active again  
21 on June 17, 2013. On June 20, 2013, I accessed the CI's Silk Road account and observed  
22 that there were two new messages from NOD. The first one was dated approximately  
23 June 16, 2013, said he was "still working from the road and should be settled in this week  
24 to talk more." The second message was dated approximately June 17, 2013, and said,  
25 "I'm back - how are you doing?"

26 36. On June 20, 2013, I conducted mobile surveillance at the Sadler and  
27 White's Bellevue residence. At approximately 1:00 p.m., I observed WHITE and an  
28

1 unidentified male get into the BMW. I followed them into Seattle to the Bainbridge  
2 Island ferry terminal.

3 37. I subsequently reviewed the tracker program and observed that the BMW  
4 traveled on the ferry, and then went directly to the post office located at 271 Winslow  
5 Way East. The vehicle remained there for approximately ten minutes. The vehicle then  
6 went directly to another post office, located at 10355 Northeast Valley Road. The vehicle  
7 remained at the post office for approximately two minutes, and then returned to the ferry  
8 to Seattle.

9 38. On July 8, 2013, Postal Inspector Brett Willyerd and I, acting in an  
10 undercover capacity, accessed the Silk Road website and conducted a controlled purchase  
11 of two grams of cocaine from "NOD." The purchase was made via a Confidential  
12 Informant's (CI) account.

13 39. On the same day, we conducted mobile surveillance in an attempt to  
14 observe SADLER and/or WHITE drop off the controlled-buy parcel at a post office or  
15 USPS collection box. At approximately 12:59 p.m., Inspector Willyerd and I observed  
16 WHITE departing the parking garage at her Bellevue residence. She was driving alone in  
17 the BMW.

18 40. We followed WHITE directly to a post office, located at 414 6th Avenue  
19 South, Seattle. Inspector Willyerd and I could not get into position to observe WHITE go  
20 inside the post office, or drop parcels off, but we did observe her driving on South King  
21 Street and 6th Avenue South, which is the intersection where the post office is located.  
22 Furthermore, Intelligence Research Specialist (IRS) Jason Royal was actively monitoring  
23 the tracker program and observed that at approximately 1:19 pm, WHITE's vehicle  
24 arrived at the post office and was there for approximately five minutes.

25 41. At approximately 1:24 p.m., we followed her from the post office on 6th  
26 Avenue South to another post office located at 91 South Jackson Street, Seattle.  
27 Inspector Willyerd and I observed her BMW parked directly in front of the post office at  
28 approximately 1:29 p.m. At approximately 1:34 pm, Inspector Willyerd observed

1 WHITE get back into her BMW and depart the post office. Additionally, IRS Royal was  
2 monitoring the tracker program and observed the vehicle arrive and depart the post office.

3 42. At approximately 2:30 p.m., Inspector Willyerd returned to the post office  
4 on 6th Avenue South and looked at all the parcels recently dropped off in the curbside  
5 and lobby collection boxes. Inspector Willyerd discovered three Express Mail parcels in  
6 the post office lobby collection box matching the handwriting of the previously profiled  
7 express labels. The parcel labels appeared to match WHITE's handwriting. One of the  
8 parcels was addressed to the CI.

9 43. Inspector Willyerd and I opened the CI package. The package contained a  
10 sealed padded envelope with "2.0c" written on the bottom. Inside the envelope was  
11 another white envelope. Inside the white envelope was a gift envelope with a roll of  
12 decorative tissue inside. We unrolled the tissue and found a vacuum-sealed bag. Within  
13 the vacuum-sealed bag was another zip-lock baggie containing suspected cocaine. We  
14 observed "2.0T-M" written in black marker on the top of the zip-lock baggie. The  
15 cocaine and the small zip lock baggie that contained it together weighed 2.2 grams. A  
16 NIK field test positively identified the substance as cocaine.

17 **E. NOD's Silk Road Profile**

18 44. As mentioned above, SADLER is believed to be selling narcotics under the  
19 name "NOD" on the Silk Road. On July 10 and 11, 2013, acting in an undercover  
20 capacity, I accessed NOD's page on Silk Road website.

21 45. I observed the first page of approximately 142 customer feedback pages.  
22 Each page contained 10 separate customer reviews. In the left-most column was the  
23 "rating" of the product(s), which were mostly listed as "5 of 5." In the next column was a  
24 "review," which provided various comments on NOD's quality of products, customer  
25 service, purchase transaction, and shipping. The next column was titled "freshness" and  
26 was an amount of time in chronological order. The first review had a corresponding  
27 freshness time of "49 minutes." The last review on the last page had a freshness of "4  
28



1 months.” The last column on the right was titled “item.” For each of the reviews, the  
2 item column provided a corresponding link to one of the following product sold by NOD:

3 2 grams Cocaine “1980s Time Machine”

4 7 grams Cocaine “Coke so awesome this girl will rock you for some”

5 3.5 grams Methamphetamine “Really tasty looking methamphetamine”

6 3 grams Heroin “3GMs of extreme heroin”

7 3.5 grams Cocaine “SRs highest quality cocaine directly off the brick”

8 1 gram Cocaine “Cocaine cut directly off the brick”

9 2 grams Heroin “2GMs of extreme heroin”

10 1 gram Heroin “The best BTH anywhere – sat arrival guaranteed”

11 1 gram Heroin “Extreme quality Black Tar”

12 46. Based on the amount of customer reviews per page (10), and the amount of  
13 pages (approximately 142), there appears to be over 1400 reviews for individual  
14 sales/purchase of small amounts of cocaine, heroin and methamphetamine. I reviewed  
15 and recorded all of the pages and linked items and created a spreadsheet totaling the  
16 amounts of each. The approximate totals of suspected drug sales over the last four  
17 months are listed below:

18 2629.5 grams of Cocaine

19 593 grams of Heroin

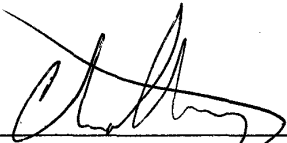
20 105 grams of Methamphetamine

21 47. According to the Silk Road, NOD has been a vendor for one year and is  
22 ranked in the top 1% of sellers (this is up from his previous ranking of being in the top  
23 2%). Because the customer reviews only go back 4 months, I could not access or record  
24 transaction prior to approximately March 2013. Therefore, there are approximately eight  
25 additional months of suspected drug sales that are unaccounted for.

**CONCLUSION**


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48. Based on the foregoing, I submit that there is probable cause to believe that STEVEN SADLER and JENNA WHITE have conspired to distribute cocaine, heroin, and methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and 846.

  
\_\_\_\_\_  
Christopher Armstrong, Complainant  
Special Agent, ICE, HSI

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 2 day of October, 2013.

  
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THE HONORABLE Brian A. Tsuchida  
United States Magistrate Judge