IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA, Plaintiff, vs. ZUKAI HE, Defendant.	No. 3:25-mj-00612-MMS

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Alexander Laumb, United States Postal Inspector (USPI) with the United States Postal Inspection Service (USPIS), being first duly sworn, depose and state the following.

1. I make this affidavit in support of a criminal complaint alleging that Zukai HE, a citizen of the People's Republic of China, aged 42, committed a violation of Title 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) (Conspiracy to Distribute and Possess with Intent to Distribute 500 grams or more of methamphetamine, its salts, isomers, or salts of its isomers). The facts contained in this affidavit are based on my own personal knowledge, as well as information provided to me by other law enforcement officers.

AFFIANT'S BACKGROUND AND TRAINING

2. I am employed by the Seattle Division of the U.S. Postal Inspection Service, specifically in the Anchorage Domicile. I am a sworn federal law enforcement officer empowered to investigate criminal activity involving or relating to the United States Postal

Service and/or United States Mail. As part of my duties, I investigate incidents where the United States mail system is used for the purpose of transporting non-mailable matter as defined in USPS Publication 52 including, but not limited to, poison, controlled substances, and "all other natural or artificial articles, compositions or materials which may kill or injure another, or injure the mails or other property, whether or not sealed as first class matter [.]"

3. I have been a U.S. Postal Inspector since August of 2019. I attended and graduated from a three-month Basic Inspector Training (BIT) academy operated by the United States Postal Inspection Service (USPIS) in November 2019. While attending the BIT academy, I received training and instruction on investigating federal crimes that use the U.S. Mail including but not limited to the sending of illegal drugs through the U.S. Mail, robbery and burglary of postal facilities, destruction of government property, theft of U.S. Mail, possession of stolen U.S. Mail, mail and bank fraud, identity theft, and counterfeit personal checks and identifications,

4. Prior to my employment with the USPIS, I was employed for nine years by the Washington National Guard Counterdrug Program as a Criminal Analyst. From 2010 to 2015, I was assigned to the Tri-City Metro Drug Task Force in Kennewick, WA and the Snohomish Regional Drug Task Force in Everett, WA. In 2016 I deployed in support of Special Operations Joint Interagency Task Force – Operation Inherent Resolve (SOJTF- OIR). Upon my return I was assigned to the Western Regional Counterdrug Training Center as the Threat Finance Senior Instructor and Branch Chief for

Law Enforcement Support instruction from 2017 to 2019. In May 2009 I received a bachelor's degree in political science from Pacific Lutheran University in Tacoma, WA.

5. As part of my duties, I investigate potential money laundering violations found in 18 U.S.C. §§ 1956, 1957, and 1960 and the specified unlawful activities which predicate those offenses including mail and wire fraud.

6. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. Many of the facts of the investigation are drawn from subject and victim statements, USPS and financial records. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

INVESTIGATION AND PROBABLE CAUSE

7. The following information is based on my own knowledge, from other law enforcement agents and officers, or from specific sources as set forth. It details significant facts of this investigation as related to the search warrant sought, not the full investigation:

8. Your affiant, along with other state, local, and federal law enforcement officers, are investigating a drug trafficking organization ("DTO") engaged in trafficking methamphetamine from Mexico into and throughout the United States with onward distribution to foreign nations including but not limited to: Canada, Australia, Ireland, Switzerland, Denmark and New Zealand. This investigation focused on the branch of the network involved in the distribution of controlled substances to and through Alaska.

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9. On January 25, 2024, WITNESS 1—who is the owner of a virtual mailbox service (VMS) in Wasilla, Alaska, contacted the USPIS concerned that one of their customers, "J.B.," was being impersonated. Previously, on November 11, 2023, "J.B." used a USPS PS 1583 form "Application for Delivery of Mail Through Agent" to open a virtual mailbox account with WITNESS 1's business. Between that time and January 25, 2024, "J.B." had used WITNESS 1's VMS to forward several parcels to different individuals at different addresses in the country of New Zealand. These packages had all originally been sent to WITNESS 1's business from addresses outside of Alaska. In January 2024, WITNESS 1 attempted to contact "J.B." regarding a recent mail forwarding request via the phone number listed on "J.B.'s" PS 1583 form, which is a phone number associated with the area code for Alhambra, California. That number connected WITNESS 1 with an Asian restaurant. The individual who answered "J.B.'s" phone said that they knew "J.B.," but that he was then on vacation. WITNESS 1 told investigators that the individual who answered sounded like an older Asian man. That individual spelled "J.B.'s" name for WITNESS 1 and directed WITNESS 1 to forward "J.B.'s" parcels as instructed on the mailing order, which WITNESS 1 found suspicious. WITNESS 1 told the individual that they would be speaking to the VMS corporate company about this matter. Soon after this call, "J.B." closed his VMS account with WITNESS 1's business.

10. On January 29, 2024, I reviewed "J.B.'s" PS 1583 form, which included a California photo ID. The California photo ID appeared to be an official ID, and it showed a picture of J.B., a young African American male with an address in Palmdale, California. A search of law enforcement databases confirmed that the information and photograph on

the ID were official and were associated with a real person with J.B.'s information at the listed address in Palmdale, California. Based on my training and experience as well as my involvement in this investigation, it is my belief that while the personal identifying information used to open the VMS account belongs to a real person, its use to open the VMS was fraudulent and that the real J.B. has no involvement in opening the VMS in their name or the packages sent to WITNESS 1's business.

11. On January 30, 2024, I met with WITNESS 1 at their Wasilla, Alaska business and secured from them two UPS parcels that had recently been sent to "J.B.'s" account to be forwarded. I subsequently learned that both packages had forwarding instructions directing that they be sent on to the country of New Zealand. On February 5, 2024, I applied for and was granted federal search warrants for those parcels and found close to three kilograms of methamphetamine. I also learned that the value of that amount of methamphetamine in New Zealand exceeds $1,000,000 in United States currency. One parcel had methamphetamine concealed inside a heat transfer stamping machine and the other had methamphetamine concealed inside a 3D printer. *(Photos next page)*

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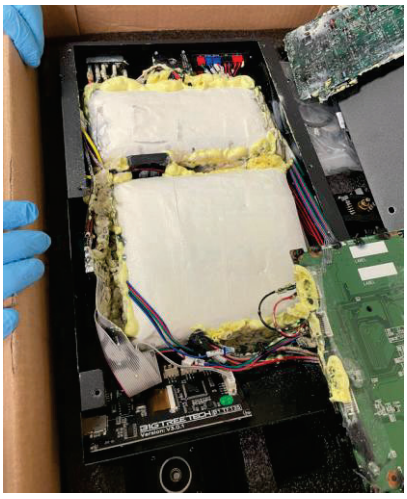

12. The heat transfer stamping machine and 3D printer and were sent to the State of Alaska Scientific Crime Detection Laboratory to be processed for latent prints. Latent prints were found on both items and were searched through the Western Identification Network and the FBI's Next Generation Identification system. The search through these systems identified a match for the left middle fingerprint on an exemplar record bearing the name Zukai HE.

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13. On or about May 14, 2024, USPIS was informed that U.S. Customs and Border Patrol had seized four parcels mailed from Post Offices in the Phoenix metro area that were destined for the country of New Zealand. Each parcel contained over one kilogram of methamphetamine. Through analysis of the parcels, USPIS identified a fifth similar parcel had been mailed from a UPS store in Chandler, Arizona, with USPS postage destined to New Zealand. CBP also intercepted this parcel and it also contained over one kilogram of methamphetamine.

14. On May 15, 2024, USPIS obtained surveillance video from the Tempe Main Post Office from which one of the parcels had been mailed. This parcel contained approximately 1.01 kilograms of methamphetamine. Surveillance video showed an Asian male, wearing a white shirt exit the driver seat of a Toyota SUV with a California Temporary license plate. USPIS also obtained surveillance video from the Chandler Main Post Office from which another of the four Arizona parcels had been mailed. This parcel contained approximately 1.20 kilograms of methamphetamine. Surveillance video revealed who appeared to be the same Asian male from the Tempe Post Office mailing had also mailed this parcel. A search of the California DMV database revealed the registered owner for the Toyota SUV from the Tempe Post Office is Zukai HE. A comparison of HE's driver's license photo with video from the two Post office surveillance videos confirmed that Zukai HE was the mailer of these two packages.

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15. On January 6, 2025, investigators were notified by employees of a third-party re-shipper in Portland, Oregon, that they had received suspicious packages. The packages were sent from California to the re-shipper, a freight forwarding company. When the packages arrived at the re-shipper, the employees working that day noticed that the weight declared on the shipping label was inconsistent with the actual weight of the boxes. According to the re-shipping company policy the employees opened the boxes to examine the contents. Once open, they identified one plastic baggie containing a white crystalline substance inside of a Crayola Air Dry Clay tub. The other box contained multiple paperback books with their insides cut out there in concealing one plastic baggie with a white crystalline substance.

16. Investigators were able to identify the location from where the boxes were shipped from in California. Investigators contacted the employees working at the origin shipping location and obtained video of the individual who shipped the boxes. When investigators watched the video from the shipping location, they were able to identify the individual who shipped the boxes as Zukai HE by comparing the appearance of the individual who shipped the boxes with Zukai HE's California driver's license picture.

17. On February 18, 2025, a GPS tracker warrant was granted for Zukai HE's vehicle.

18. On February 20, 2025, Zukai HE's vehicle was located at 2617 Snead Drive, Alhambra, CA 91803. The same community associated with the phone number used to open "J.B.'s" VMS account.

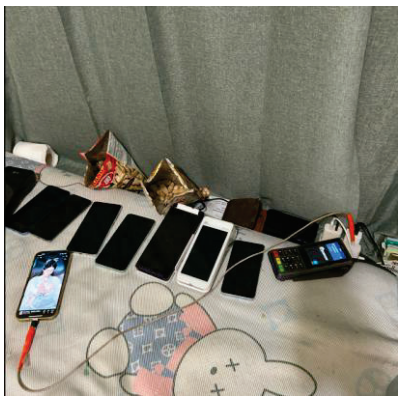
19. I reviewed shipping records associated with Zukai He's residence and identified that the address had received four parcels in late 2023 to early 2024 associated with a postage meter that had been used to ship thirty-six other parcels across the United States.

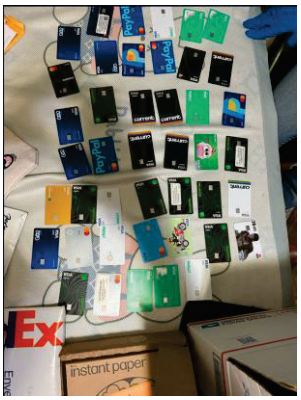
20. On March 13, 2025, USPIS conducted a trash pull at 2617 Snead Drive, Alhambra, CA 91803. During the trash pull USPIS discovered a small black bag that contained multiple pieces of heat-sealed packaging. The packaging appeared to be stained with what appeared to be blue dye. Some of the packaging was coated in a white crystal residue that tested positive via TruNarc for methamphetamine.

21. On September 8, 2025, USPIS, DEA and HSI investigators executed a federal search warrant at 2617 Snead Dr., Alhambra, CA 91803. During the course of the search warrant, law enforcement officers discovered three Chinese nationals inside of the residence, including Zukai HE. Zukai HE is unlawfully present in the United States as a result of an Order of Removal dated September 23, 2024, after it was determined that he had previously and unlawfully entered the United States without admission or parole. Zukai HE had previously been subject to a warrant of removal and deportation following his illegal entry into the United States on September 8, 2017.

22. The following items were seized from Zukai HE's bedroom: 14 cell phones; two HP laptops; 25 point-of-sale systems; approximately 6.194 kilograms of a white crystalline substance consistent with methamphetamine; $13,493 United States Currency and various financial documents. I believe that HE and his associates used the

point-of-sale systems to extract value from credit cards, debit cards, and gift cards, and transfer the money to accounts set up for their numerous front businesses.





23. The financial documents included information for nine suspected shell or front businesses that had been registered in California, Colorado, Maryland, and New York. These businesses were in either Zukai HE's name or predominantly under the names of others whose identities appear to have been stolen and fraudulently used.

24. There were also multiple printed spreadsheets that showed hundreds of victims listing their personal identifiable information including their name, date of birth, social security number, mailing address, and IP address. In addition to the financial documents there were dozens of physical and printed identifications cards of victims.

These identification cards were either the original cards of the victim or fake cards which had been altered with a photo of Zukai HE or other unknown subjects.

CONCLUSION

25. Based upon the information above, your affiant submits that there is probable cause to believe that at some exact time unknown but at least between November 11, 2023 and September 8, 2025, in the District of Alaska and elsewhere, Zukai HE combined, conspired, confederated, and agreed with others currently unknown to distribute and possess with intent to distribute 500 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A).

Respectfully Submitted,

Alexander Laumb Digitally signed by Alexander Laumb Date: 2025.09.26 17:22:57 -08'00'

ALEXANDER LAUMB
Postal Inspector
United States Postal Inspection Service

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed.R. Crim. P. 4.1 and 41(d)(3) this 26th day of Sept, 2025.

UNITED STATES DISTRICT COURT DISTRICT OF ALASKA

Hon. Matthew M. Scoble
United States Magistrate Judge
District of Alaska