

AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

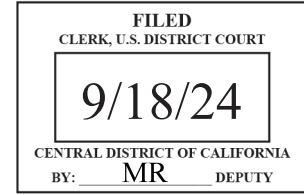
Original Duplicate Original

UNITED STATES DISTRICT COURT



for the

Central District of California



United States of America,

v.

JASOUR JOESUFOVICH KOUDRATOV,

Defendants

Case No. 2:24-mj-05690-DUTY

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of September 17, 2024, in the County of Los Angeles in the Central District of California, the defendant violated:

Code Section

21 U.S.C. § 841(a)(1)

Offense Description

Distribution and possession with intent to distribute controlled substances

This criminal complaint is based on these facts:

Please see attached affidavit.

Continued on the attached sheet.

/s/

Complainant's signature

Special Agent Christopher Hicks, HSI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 9/18/2024

Judge's signature

City and state: Los Angeles, California

Hon. Pedro V. Castillo, U.S.M.J.

Printed name and title

AUSA: Kedar S. Bhatia (x4442)

AFFIDAVIT

I, Christopher Hicks, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against Jasour Joesufovich KOUDRATOV for a violation of 21 U.S.C. § 841 (a) (1) (distribution and possession with intent to distribute controlled substances).

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant, and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. BACKGROUND OF THE AFFIANT

3. I am a Special Agent with Homeland Security Investigations ("HSI"), assigned to the Northridge Public Safety Group. I have been employed by HSI since April 2015. My duties include the investigation of violations of federal criminal law, particularly those relating to financial fraud, computer fraud, immigration, customs, and narcotics. As a Special Agent with HSI, my training included HSI Special Agent Training for 15 weeks at the Federal Law

Enforcement Training Center, which covered financial, narcotics, immigration and customs laws. I also have extensive experience with cryptocurrency, Money Laundering and AML/KYC compliance, and dark net narcotics trafficking investigations. As a result of my training and experience, I am familiar with federal laws concerning access device fraud, wire fraud, mail fraud, and money laundering, as well as customs, narcotics, and immigration violations.

4. Prior to my employment with HSI, I was a Special Agent with the U.S. Secret Service ("USSS"), in Los Angeles, California. As a Special Agent with USSS, my training included the Criminal Investigator Training Program in Brunswick, Georgia, and training specific to the USSS in Beltsville, Maryland. While with the USSS, I focused on financial investigations and asset forfeiture.

5. Furthermore, as part of my law enforcement duties, I, alongside other Inspectors, have conducted parcel investigations that have resulted in the arrest of individuals who have received and distributed controlled substances, as well as the seizure of illegal drugs and proceeds from the sale of illegal drugs.

III. SUMMARY OF THE PROBABLE CAUSE

6. Since May 2024, law enforcement officers have been investigating a particular dark web vendor account that is being used to sell cocaine, MDMA, ecstasy, LSD, Adderall, Xanax, and ketamine. The vendor account, using the moniker "KINDPEOPLE," was also recently linked with the overdose death of 17-year-old male in May 2024.

7. In or about May 2024, officers with the Ventura County Sheriff's Office investigating Dark Web Vendor Account-1 conducted controlled purchases of narcotics from the Dark Web Vendor Account. Officers paid for the narcotics with Bitcoin. Through Bitcoin transfers and IP analysis, investigators associated Jasour Joesufovich KOUDRATOV and a particular person with whom he is in a relationship ("CC-1"), as individuals utilizing the Dark Web Vendor Account to sell narcotics.

8. In August 2024, agents obtained warrants to collect historical and prospective location data for a cellphone believed to be used by KOUDRATOV and installed a GPS tracker on a vehicle believed to be used by KOUDRATOV and CC-1 (the "KOUDRATOV Vehicle"). During surveillance, officers had multiple times seen KOUDRATOV driving in the KOUDRATOV Vehicle.

9. Using the GPS tracker, in September 2024, agents learned the KOUDRATOV Vehicle had traveled to the vicinity of a particular post office in Pasadena, California. Video surveillance from that post office showed KOUDRATOV dropping off four parcels that day. After obtaining a warrant to seize and search the parcels, agents opened the parcels, learning that they contained suspected MDMA, Ketamine, and Adderall - all items that are advertised for sale by the Dark Web Vendor Account.

10. On September 17, 2024, law enforcement officers searched the KOUDRATOV Vehicle and KOUDRATOV's apartment (the "KOUDRATOV Apartment") pursuant to judicially authorized search warrants. In

the KOUDRATOV Vehicle, officers found large quantities of suspected cocaine, Adderall, Ketamine, MDMA, and Alprazolam (i.e., Xanax). In the KOUDRATOV Apartment, officers found bulk cash, a money counter, packaging materials, and shipping labels.

IV. STATEMENT OF PROBABLE CAUSE

A. BACKGROUND ON THE DARK WEB

11. Based on my review of law enforcement reports, conversations with other law enforcement agents, and my own knowledge of the investigation, I am aware of the following:

a. Through the dark web or darknet (websites accessible only through encrypted means), individuals have established online marketplaces for narcotics and other illegal items. These markets often only accept payment through virtual currencies, such as Bitcoin. Accordingly, large amounts of Bitcoin sales or purchases by an individual from such a marketplace can be an indicator that the individual is involved in narcotics trafficking or the distribution of other illegal items. Individuals intending to purchase illegal items on dark web or darknet websites need to purchase or barter for Bitcoins. Further, individuals who have received Bitcoins as proceeds of illegal sales on dark web or darknet websites need to sell their Bitcoins to convert them to fiat (government-backed) currency.

b. Such purchases and sales are often facilitated by peer-to-peer Bitcoin exchangers, who are not registered with the federal or a state government, or by exchangers that offer a degree

of anonymity. These unregistered exchangers often charge a higher transaction fee than legitimate, registered virtual currency exchangers who have robust anti money-laundering programs, including full customer verification. This higher fee is essentially a premium that the unregistered exchangers charge in return for not filing reports on exchanges pursuant to the Bank Secrecy Act, such as Currency Transaction Reports and Suspicious Activity Reports. Peer-to-peer Bitcoin exchangers can conduct these transactions in person or through technology, such as cryptocurrency ATMs (described below).

c. All Bitcoin transactions are recorded on a public ledger known as the "Blockchain," stored on the peer-to-peer network on which the Bitcoin system operates. The Blockchain serves to prevent a user from spending the same Bitcoins more than once. However, the Blockchain only reflects the movement of funds between anonymous Bitcoin addresses and, therefore, cannot by itself be used to determine the identities of the persons involved in the transactions. Only if one knows the identities associated with each Bitcoin address involved in a set of transactions is it possible to meaningfully trace funds through the system.

B. VENTURA COUNTY SHERIFF'S OFFICE INVESTIGATION INTO THE FATAL OVERDOSE OF VICTIM-1

i. Fatal Overdose

12. Based on my review of VCSO records and my communications a particular VCSO officer ("VCSO Officer-1"), I have learned, among

other things, the following regarding the VCSO's investigation of an overdose death:

a. On May 6, 2024, another particular VCSO officer ("VCSO Officer-2") was dispatched to a particular school in Ojai, California, based on a report that a particular victim, who was later identified as being 18-years-old, had stopped breathing (the "Victim"). When VCSO Officer-2 arrived in Victim room, he observed a white male approximately 17 years old laying on the floor of the room. The room was small in size with a twin-size bed, a small desk, a closet and a small bench. The Victim was pronounced dead at 10:29 p.m.

13. In the room, VCSO Officer-2 found a prescription pill bottle issued to the Victim with Hydroxyzine HCL 25mg. There were numerous other baggies with white envelopes containing the same medication as if it was dispersed in smaller quantities by school medical staff. Another VCSO officer saw a scale sitting on top of the desk. As VCSO Officer-2 took a closer look at the scale, he found there were small quantities of a white powdery substance on top of the scale and on the desk next to the scale. In a black eyeglasses case on the desk next to the scale, VCSO Officer-2 saw a small white package with the top torn open as if it were a small sugar packet. In the open end of the package, VCSO Officer-2 saw a blue folded piece of paper and a clear plastic baggie. The blue piece of paper had the following message printed on it, "Dear Friends, If the market experiences a decline, here is our direct

contact information: session/telegram/threema Additionally, there is a 5% discount available for orders placed directly with us, feel free to ask about your wholesale needs :)” On the back of the blue piece of paper, there were three QR codes.

14. The QR code in the middle was blue and had the following words typed below it, “@KINDPEOPLESTORE.” Some of the items found in the Victims room are shown below:



15. 20. Based on my review of records from the Ventura County Medical Examiner, I know that an autopsy of the Victim was conducted

by the Ventura County Medical Examiner. The autopsy report states that the cause of death was "Cocaine Toxicity" and the manner of death was "Accident."

ii. VCSO Investigation

16. Based on my review of VCSO records and my communications with VCSO officers, I have learned that on or about May 7, 2024, VCSO Officer-1 scanned the QR code which was labeled "@KINDPEOPLESTORE". The QR code opened up a Telegram channel under that name. VCSO Officer-1 immediately received a private message from the manager of the group and he began to converse with that person. The conversation is below:

KindPeople: "Heey:)" (9:44 a.m.)

VCSO Officer-1: "Hey" (9:44 a.m.)

KindPeople: "Nice to see you here!" (9:45 a.m.)

VCSO Officer-1: "my classmate told me about u" (9:46 a.m.)

KindPeople: "**Sent a menu of all the various controlled substances which can be purchased**" (9:47 a.m.)

KindPeople: "Our menu" (9:47 a.m.)

KindPeople: Replied "Great :)" to VCSO Officer-1's previous comment (9:47 a.m.)

KindPeople: "You tell me what would you like and payment method: btc or xmr, I tell you a price and address (xmr or btc), You send money and after I'll tell when your order will be shipped :), Unfortunately here is no escrow :(" (9:48 a.m.)

VCSO Officer-1: "Ok ill let u no" (9:53 a.m.)

KindPeople: "Thanks" (9:56 a.m.)

VCSO Officer-1: "U do fett?" (10:19 a.m.)

KindPeople: "No" (10:20 a.m.)

The KINDPEOPLE account sent to VCSO Officer-1 the following image, showing various narcotics, quantities, and prices:

g	Coke Panama	\$\g	Coke Bolivia	\$\g	MDMA Champagne	\$\g	Ketamine S/ Unicorn	\$\g	Ketamine R	\$\g
1	\$70	\$70	\$75	\$75	\$64	\$64	\$71	\$71	\$70	\$70
2	\$120	\$60	\$130	\$65	\$108	\$54	\$131	\$66	\$126	\$63
3	\$177	\$59	\$192	\$64	\$160	\$53	\$194	\$65	\$183	\$61
5	\$290	\$58	\$315	\$63	\$266	\$53	\$314	\$63	\$300	\$60
7	\$399	\$57	\$434	\$62						
10	\$551	\$55	\$590	\$59	\$523	\$52	\$618	\$62	\$590	\$59
14	\$745	\$53	\$798	\$57	\$705	\$50	\$838	\$60	\$798	\$57
28.35	\$1,214	\$43	\$1,400	\$49	\$1,347	\$48	\$1,543	\$54	\$1,588	\$56
56.7	\$2,263	\$40								
85.05	\$3,114	\$37								

pc	Adderall oval B974/ circle 30mg	\$\pc	XTC Tesla	\$\pc	Adderall B974, 30mg (strong)	\$\pc	Xanax, 2mg, Alprazolam	\$\pc		
3			\$46	\$15						
5			\$76	\$15			\$38	\$7.6		
10	\$38	\$3.8	\$114	\$11	\$52	\$5.2	\$67	\$6.7		
15	\$50	\$3.3	\$157	\$10	\$71	\$4.7	\$78	\$5.2		
20	\$66	\$3.3	\$209	\$10	\$95	\$4.7	\$104	\$5.2		
25	\$71	\$2.8	\$238	\$10	\$107	\$4.3	\$120	\$4.8		
30 bottle							\$156	\$5.2		
50	\$143	\$2.9	\$475	\$10	\$214	\$4.3	\$215	\$4.3		
60 2 bottles							\$270	\$4.5		
90 3 bottles							\$365	\$4.1		
100	\$238	\$2.4	\$1,000	\$10	\$333	\$3.3	\$380	\$3.8		

17. Based on my training and experience, I believe the menu that the KINDPEOPLE account gave VCSO Officer-1 listed various different controlled substances which were available for purchase.

The listed drugs were Coke "Panama", Coke "Bolivia", MDMA "Champagne", Ketamine "Unicorn", Ketamine "R", Adderall "Oval B974/Circle 30mg", XTC "Tesla", Adderall "I B974 30mg (strong)", and Xanax "2mg Alprazolam". The KINDPEOPLE account had the prices of each substance broken into grams from 1 gram up to 85.05 grams or by pieces, 3 up to 100. As set forth below, in September 2024, officers would see video surveillance of KOUDRATOV mailing four parcels that were later searched and found to contain suspected Adderall, MDMA, and Ketamine - all items available for sale by the KINDPEOPLE account.

18. Furthermore, based on my training and experience, when the user of the KINDPEOPLE account wrote "You tell me what would you like and payment method: btc or xmr, I tell you a price and address (xmr or btc)," the user was offering to transact in the cryptocurrencies Bitcoin ("btc") or Monero ("xmr"). As set forth below, officers would later do controlled purchases from the KINDPEOPLE account and used Bitcoin to pay for the narcotics they purchased.

iii. First Controlled Purchase

19. Based on my review of VCSO records and my communications with VCSO officers, I have learned the following:

a. VCSO Officer-1 purchased 5 grams of cocaine from the KINDPEOPLE, which I believe, based on my investigation, was operated by KOUDRATOV. In communications with KINDPEOPLE, the user of the account offered "Panama" or "Bolivia," which I believe, based on my

training and experience, are two types of cocaine. On May 8, 2024, VCSO Officer-1 began to converse with the KINDPEOPLE account once again. The following is their conversation, which occurred on different dates between May 8, 2024, and May 14, 2024:

05/08/2024

VCSO Officer-1: "Hey. Can I get 5 of bolivia?" (3:25 p.m.)

VCSO Officer-1: "I going to town tonight and can sent btc"
(4:23 p.m.)

KindPeople: "Hey:)" (11:23 p.m.)

KindPeople: "\$327" (11:23 p.m.)

KindPeople: "bc1gnh2pfaz9tsszpqazc97rqdy63w4fr5rvxrefj3"
(11:23 p.m.)

05/09/2024

VCSO Officer-1: "ok I'll send it soon. Will u send a tracking?" (9:13 a.m.)

KindPeople: "We don't provide but you can ask me for an update Any time:)" (9:26 a.m.)

VCSO Officer-1: "Got it" (9:46 a.m.)

VCSO Officer-1: "Sent. 261 West Villanova Road, Ojai, CA 93023" (3:13 p.m.)

KindPeople: "Received, We will ship your order on Friday"
(9:42 p.m.)

VCSO Officer-1: "Thank you" (9:53 p.m.)

05/10/2024

VCSO Officer-1: "Hello. It go out today?" (9:22 p.m.)

KindPeople: "Hey Your order has been shipped" (9:23 p.m.)

VCSO Officer-1: "Thanks!" (9:26 p.m.)

05/13/2024

VCSO Officer-1: "Morning when can I expect my package?"

(9:16 a.m.)

KindPeople: "Morning Let me check pls" (9:24 a.m.)

KindPeople: "Delivered, In/At Mailbox. Your item was delivered in or at the mailbox at 4:19 pm on May 13, 2024 in OJAI, CA 93023., OJAI, CA, 93023" (10:24 p.m.)

05/14/2024

VCSO Officer-1: I got it. Thanks. (9:19 a.m.)

b. On May 9, 2024, VCSO Officer-1 sent the suspect \$327 worth of Bitcoin. The suspect indicated he received the Bitcoin and said the cocaine was shipped.

c. On May 13, 2024, the package arrived at the provided address via the United States Postal Service ("USPS"). Inside the package was just over 5 grams of powdery substances, which later tested positive for cocaine using a TruNarc¹ device. A piece of paper with @KINDPEOPLESTORE and three QR codes on it was also in the package. This package is similar to the packaging found near the decedent in the overdose death described above. The return address

¹ A TruNarc device is a Handheld Raman Spectrometer/Narcotics Analyzer which enables law enforcement to conduct non-destructive, non-contact sampling of more than 530 suspected controlled substances.

on the USPS package was "Cricket Wireless Authorized Retailer" at 2430 S Bristol St, Santa Ana, CA 92704. The tracking number was "9405 5362 0624 8009 8629 95." Using the USPS website, VCSO Officer-1 tracked the package and its origins, learning the package was shipped from Santa Ana, California.



d. On May 9, 2024, VCSO investigators conducted a controlled buy from the KindPeople moniker on Telegram. Payment was settled in Bitcoin. A copy of the initial tracing report was provided to HSI Northridge, which showed the following transaction:

TxHash:

e167f4bd96ac2e35e8232d9de1e6e82efe33c3dfb211fbd22e972e18f3
3ae524

Output: bc1qnh2pfaz9tsszpqazc97rqdy63w4fr5rvxrefj3

("Bitcoin Address 1")

Amount: 0.00522813

Asset: BTC

Network: Bitcoin

e. On May 12, 2024, Bitcoin Address 1 combined the 0.00522813 input² with 33 additional co-spent³ inputs to transfer 0.19582851 BTC to Binance deposit address 1EtFPZ3yQeuVY3Lkwekn3wtxDsTb5Gwqhn ("Bitcoin Address 2") via txhash: 7f968022c183d9c9e84e1b09ed1fccafa3601a0daa60bcf11d50260853e9a2bb

f. An inquiry to Binance showed that Bitcoin Address 2 belongs to SafePal. Based on my training and experience, SafePal is an online service that allows individuals to hold cryptocurrency assets.

iv. Second Controlled Purchase

20. Based on my review of VCSO records and my communications with VCSO officers, I have learned the following:

a. On June 6, 2024, VCSO Officer-1 initiated another controlled buy from the KINDPEOPLE account. Specifically, VCSO

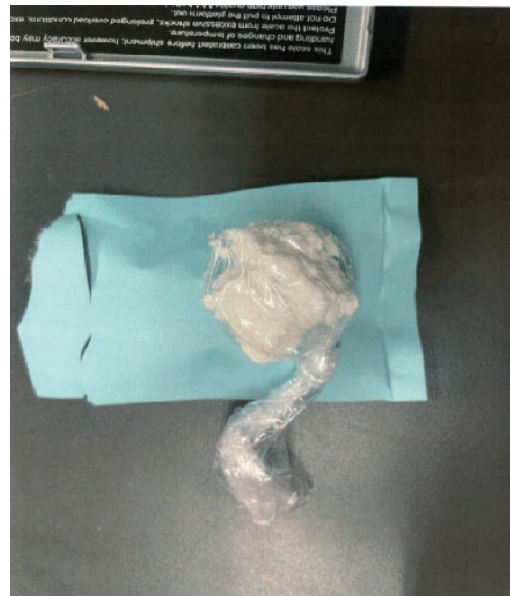
² In Bitcoin transactions, inputs refer to the sources of Bitcoin being spent, typically referencing previous transactions, while outputs designate the recipients and the amounts of Bitcoin being transferred. Each transaction must balance its total inputs with its total outputs.

³ Co-spending in Bitcoin refers to the practice of spending multiple unspent transaction outputs (UTXOs) in a single transaction. This suggests the same individual or entity has control over the private keys, as they can sign a single transaction that references multiple UTXOs. Co-spending is a common practice used for consolidating funds, enhancing privacy, and reducing transaction fees in Bitcoin transactions.

Officer-1 sent the KINDPEOPLE account \$327 worth of Bitcoin to cryptocurrency wallet "bc1q6smyn5ygnduc8rfd8zlgv36npzej4yyde4pwgq." The user of the KINDPEOPLE account confirmed receipt of the Bitcoin and said the cocaine was shipped.

b. On June 10, 2024, the package arrived at the provided address via USPS. Inside the package was just over 5 grams of powdery substances, which later tested positive for cocaine using a TruNarc device.

c. The return address was "Psycho Turtle Collectibles" at 9547 Telegraph Road, Pico Rivera, Ca. The tracking number was "9405 5362 0624 8220 9963 49." Using the USPS website, VCSO Officer-1 tracked the package and its origins, learning the package was shipped from Pico Rivera, California.



d. Payment for this package was settled in Bitcoin via the following transaction:

Timestamp: 2024-06-06T22:39:50.000Z

TxHash:

6287d7130f2c72a1a667a9f06dba932f722d3fc19fee5888a503cd53ad
347c17

Output: bc1q6smyn5ygnduc8rfd8zlgv36npzej4yyde4pwgq

("Bitcoin Address 3")

Amount: 0.00462346

Asset: BTC

Network: Bitcoin

e. From Bitcoin Address 3, the 0.00462346 input was combined with 21 additional co-spent inputs to send 0.11688594 BTC to Bitcoin Address 2 and the remaining 0.00204265 BTC went to another change address.

v. SafePal Records Show Money Was Sent To A Bitcoin Wallet Accessed by KOUDRATOV and CC-1

21. As set forth herein, Bitcoin funds were sent to two different addresses for the first and second controlled purchase, but then money from those separate accounts was directed to the same account, Bitcoin Address 2. Bitcoin Address 2 is utilized by SafePal. Records from SafePal show that this common account was accessed from IP addresses tied CC-1 and in turn the KOUDRATOV Cellphone and an address tied to both KOUDRATOV and CC-1.

22. Based on my review of VCSO records and my communications with VCSO officers, I have learned the following:

a. A particular VCSO investigator ("VCSO Investigator-1") requested records from SafePal related to Bitcoin Address 2.

SafePal provided records associated to a particular account (the "SafePal Account"), which did not include information on the user's identity.

b. In June 2024, VCSO Investigator-1 sent a KYC (Know Your Customer) request to SafePal's legal department in reference to the account associated with Bitcoin Address 2. On June 6, 2024, SafePal provided transaction records for this wallet, including deposit and withdrawal activity. Between March 31, 2024, and June 5, 2024, approximately 16 withdrawals were completed. On 14 of these occasions, an internet protocol (IP) address of "108.81.246.145" ("IP Address-1") was utilized during the transaction.

c. VCSO Investigator-1 conducted an open-source search for IP Address-1 and learned that it was assigned to the internet service provider AT&T with an address located in Pasadena, California.

23. On June 10, 2024, the Hon. Paul Feldman, Supreme Court of California, Ventura County, authorized a search warrant to AT&T for account records related to IP Address-1. AT&T records show that IP Address-1 was subscribed to CC-1 at the address "175 VALLEY APT 3107, PAS, CA 91105," where officers would later find KOUDRATOV, CC-1, and narcotics paraphernalia, *i.e.*, the KOUDRATOV Residence.

24. Based on my review of SafePal records, I have learned that the SafePal Account was accessed by two other IP addresses at the following dates and times:

a. 2600:1012:b04c:dc89:8d00:1fe9:4c40:6ff0 ("IP Address-2") - 01/15/2024 @ 10:50:41 PM UTC

b. 174.193.130.71 ("IP Address-3") - 02/04/2024 @ 7:21:52 PM UTC

25. On or about June 12, 2024, VCSO served a search warrant to Verizon for subscriber data linked to IP Address-2 and IP Address-3. Based on my review of records provided by Verizon, I have learned that:

i. The subscriber associated with IP Address-2 and IP Address-3 is Tom Jones at 123 Spring PS, Beverly Hills, CA. The account is prepaid. Based on my search for this address on Google Maps, I do not believe this is an actual address.

ii. The Home/work Phone listed on the account is the KOUDRATOV Cellphone.

iii. The listed owner email is timur_koudratov@hotmail.com. This email account references KOUDRATOV's last name, although it references a different first name.

vi. Surveillance Shows KOUDRATOV and CC-1 at the KOUDRATOV Residence and Using the KOUDRATOV Vehicle

26. As set forth below, in June 2024 and July 2024, VCSO conducted surveillance at the KOUDRATOV Residence. Surveillance showed KOUDRATOV and CC-1 in the parking lot below the KOUDRATOV Residence and showed them together in the KOUDRATOV Vehicle, which is registered to CC-1. As set forth above, the KOUDRATOV Residence

is also the same address that IP address records show accessed the cryptocurrency wallet that ultimately received the funds from both the first and second controlled purchases.

27. Based on my review of law enforcement reports, I know the following:

a. On June 20, 2024, VCSO Officer-1 conducted surveillance at the KOUDRATOV Residence. Around 2:00 p.m., VCSO Officer-1 saw KOUDRATOV exit the underground parking structure below the KOUDRATOV Residence driving the KOUDRATOV Vehicle.

b. On July 2, 2024, VCSO officers conducted surveillance at the KOUDRATOV Residence. While doing surveillance, KOUDRATOV was seen coming out of the KOUDRATOV Residence, *i.e.*, Unit 3107, holding a large trash bag. Later, another VCSO officer was in the underground parking lot underneath the apartment complex when he saw KOUDRATOV walk out of the pedestrian door, place two bags into the trunk of the KOUDRATOV Vehicle, and get into the driver's seat. CC-1 then walked out of a different door in the underground parking lot and got into the front passenger seat of the KOUDRATOV Vehicle. KOUDRATOV then drove the KOUDRATOV Vehicle out of the parking garage.

28. Based on my review of law enforcement records, I know that the KOUDRATOV Vehicle is registered to CC-1 and the registration address is "175 VALLEY ST UNIT 3107 PASADENA 91105," *i.e.*, the KOUDRATOV Residence.

C. OFFICERS OBTAIN WARRANTS TO OBTAIN KOUDRATOV'S CELLPHONE LOCATION DATA AND TO INSTALL A GPS TRACKER ON HIS VEHICLE

29. Based on my involvement in this investigation, I know that on August 23, 2024, the Honorable Stephanie S. Christensen, United States Magistrate Judge, authorized a warrant for historical and prospective location information for a particular cellphone believed to be used by KOUDRATOV (the "KOUDRATOV Cellphone").⁴ See No. 2:24-mj-5121 (C.D. Cal.).⁵ On August 26, 2024, agents served the warrant to Verizon. On that date, Verizon began providing location data for the KOUDRATOV Cellphone.

30. Based on my review of location data for the KOUDRATOV Cellphone obtained pursuant to a warrant, I know that location data for the KOUDRATOV Cellphone frequently shows the cellphone in the

⁴ Based on my review of Verizon records, I have learned that the KOUDRATOV Cellphone is subscribed to in the name of "Tom Jones," the subscriber address "123 SPRING PS, BEVERLY HILLS, California 90210," and subscriber email address timur_koudratov@hotmail.com. A search through publicly available records shows that "123 Spring PS, Beverly Hills, California 90210" is a non-existent address. In addition, the subscriber name for the KOUDRATOV Cellphone, "Tom Jones," is a common name. Based on my training and experience, and my involvement in this investigation, I believe the KOUDRATOV Cellphone is used by KOUDRATOV, and KOUDRATOV used a fake address and name to avoid law enforcement detection. Moreover, as set forth above, subscriber records for the KOUDRATOV Cellphone list the same generic name, fake address, and email address as the internet service account that accessed Bitcoin Address 2.

⁵ In the same warrant, Judge Christensen authorized agents to collect historical and prospective location for the CC-1 Cellphone. However, due to the warrant listing a different IMSI number than the one identified by Verizon, Verizon did not provide location data pursuant to that warrant. On September 10, 2024, the Hon. Charles F. Eick authorized a revised warrant for historical and prospective location data for the CC-1 Cellphone. See 2:24-mj-5491 (C.D. Cal.).

vicinity of the KOUDRATOV Residence, including as recently as September 15, 2024.⁶

31. On August 23, 2024, the Hon. Stephanie S. Christensen, United States Magistrate Judge, authorized a warrant for officers to install a GPS location tracker on the KOUDRATOV Vehicle (the "Vehicle Tracker"). See No. 2:24-mj-5120 (C.D. Cal.). On August 29, 2024, agents installed a GPS tracking device onto the KOUDRATOV Vehicle.

D. KOUDRATOV TRAVELS FROM THE KOUDRATOV Residence TO DROP OFF FOUR PACKAGES CONTAINING SUSPECTED CONTROLLED SUBSTANCES

32. Based on my review of location data for the Vehicle Tracker and the KOUDRATOV Cellphone, I have learned that the Vehicle Tracker and the KOUDRATOV Cellphone are frequently located in the same vicinity, including as recently as September 15, 2024, and are frequently observed traveling together, including as recently as September 13, 2024.⁷ Based on my training and experience, this further shows that KOUDRATOV is in whole or in part the user of the KOUDRATOV Vehicle.

⁶ For example, on September 15, 2024, at approximately 9:11pm PST, location data for KOUDRATOV Cellphone shows the cellphone in the vicinity of the KOUDRATOV Residence.

⁷ For example, on September 13, 2024, between approximately 12:41pm and 2:11pm location data for the Vehicle Tracker and KOUDRATOV cellphone were observed traveling together.

i. KOUDRATOV Drops Off The KOUDRATOV Parcels

33. Based on my review of the location data for the Vehicle Tracker and location data for the KOUDRATOV Cellphone, I have learned that KOUDRATOV frequently travels to certain post offices near the address I believe is his residence, based on my involvement in this investigation.

34. Based on my communications with other law enforcement officers, I have learned the following:

a. On September 10, 2024, location information for the Vehicle Tracker showed the KOUDRATOV Vehicle was in the vicinity of a post office at 600 Lincoln Ave., Pasadena, California (the "Lincoln PO"). After seeing this location information, HSI agents notified a particular USPIS Inspector (the "USPIS Inspector"). The USPIS Inspector coordinated with the Lincoln PO to segregate four particular parcels that were believed to be dropped off by KOUDRATOV, as described below (the "KOUDRATOV Parcels"). The USPS Parcels are the USPS Priority Small Mail Flat Rate parcels bearing tracking numbers 9405 5362 0624 8905 7827 48 ("KOUDRATOV Parcel 1"), 9405 5362 0624 8905 7809 59 ("KOUDRATOV Parcel 2"), 9405 5362 0624 8905 7822 36 ("KOUDRATOV Parcel 3"), and 9405 5362 0624 8905 7816 04 ("KOUDRATOV Parcel 4").

b. On September 11, 2024, HSI agents met with the USPIS Inspector at the Lincoln PO. The inspector was able to access the security camera footage from the lobby where the parcel drop bin is located. During the approximate time when the Vehicle Tracker showed

KOUDRATOV's vehicle at the Lincoln PO on September 10, 2024, security camera footage showed a white male with dark hair, matching the general appearance of KOUDRATOV (based on an HSI agent's review of a DMV photograph of KOUDRATOV and video and images of him captured at another post office) enter the Lincoln PO, as shown below:



c. The security camera footage then shows KOUDRATOV remove four small flat rate boxes from a bag that he carried into

the Lincoln PO, place the flat rate boxes in the parcel drop bin, and then leave.

d. The USPIS Inspector gathered the four flat rate boxes that were separated by the Lincoln PO the previous day, *i.e.*, the KOUDRATOV Parcels. The USPIS Inspector confirmed there were no other flat rate parcels in the bin when the KOUDRATOV Parcels were separated from the bin the previous day. Four small flat rate parcels were dropped by KOUDRATOV and four were found in the collection bin.

e. Agents identified certain suspicious characteristics of the KOUDRATOV Parcels, like the fact that KOUDRATOV dropped off the parcels but was not listed in the return address for any of the parcels and, for three of the parcels, the recipient names could not be verified to the recipient addresses listed on the parcels.

35. Based on my review of law enforcement records, I know that on September 11, 2024, a South Gate Police Department Detective had his trained narcotics detection dog, "Otis," examine the exterior of the KOUDRATOV Parcels. Each of these exterior examinations were completed individually. I learned from the detective that Otis gave a positive alert to each of the KOUDRATOV Parcels separately, indicating the presence of controlled substances or other items, such as the proceeds of controlled substances that emitted the odor of controlled substances, in each of the KOUDRATOV Parcels.

ii. **Agents Learn the USPS Parcels Contain Suspected
Controlled Substances Sold By The KindPeople Vendor
Account**

36. On September 13, 2024, the Hon. Jean P. Rosenbluth, United States Magistrate Judge, authorized a warrant for officers to search the four KOUDRATOV Parcels. See No. 2:24-mj-5563 (C.D. Cal.). On September 13, 2024, pursuant to the warrant, HSI and VCSO searched the KOUDRATOV Parcels. Based on my observations and communications with other law enforcement officers, I have learned the following regarding the search of the parcels:

a. KOUDRATOV Parcel 1 contained approximately 426 grams of suspected Adderall. The narcotics were concealed in a black plastic wrap, inside of a brown envelope. Under the black plastic wrap was a band-aid box, and within the band-aid box were medical non-stick pads and orange pills labeled "30 on one side and 974 on the other side". As set forth above, Adderall is advertised by the KindPeople vendor account. Based on my training and experience, I know that Adderall is a controlled substance. Through my knowledge and speaking with other agents, I know that the appearance and markings match that of known Adderall. Additionally, an open-source query of the markings showed websites displaying counterfeit Adderall pills that matches the color and markings of those seized from KOUDRATOV Parcel 1.

b. KOUDRATOV Parcel 2 contained approximately 294 grams of suspected MDMA, a controlled substances sometimes referred to as

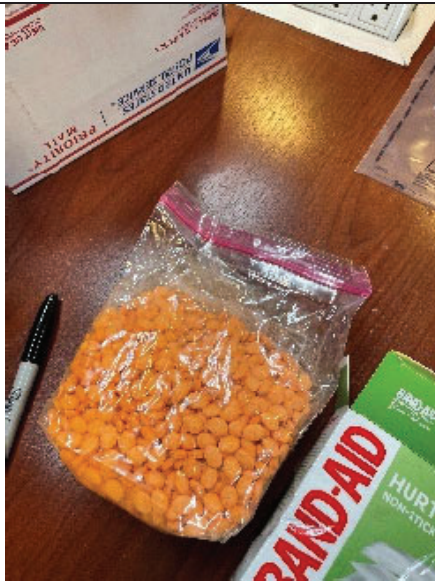
"ecstasy." The narcotics were concealed in a black plastic wrap, inside of a brown envelope. Under the black plastic wrap was a band-aid box, and within the band-aid box were medical non-stick pads and the purple pills stamped with a Telsa logo. Orange Teslas (suspected by agents to be MDMA) are advertised on the KindPeople vendor account. Through my knowledge and speaking with other agents, I know that the appearance and markings match that of known MDMA. Additionally, an open-source query of the markings showed websites displaying MDMA pills that matches the color and markings of those seized from KOUDRATOV Parcel 2.

c. KOUDRATOV Parcel 3 contained approximately 45 grams of suspected ketamine. A field test using a TruNarc resulted in a positive identification of Ketamine. The narcotics were concealed in a black plastic wrap, inside of a brown envelope. Under the black plastic wrap was a box with Cyrillic letters, and within that box was a clear bag that contained the white powder suspected to be ketamine. Ketamine is advertised on the KindPeople vendor account. Based on my training and experience, I know that ketamine is a controlled substance.

d. KOUDRATOV Parcel 4 contained approximately 49 grams of suspected MDMA. The narcotics were concealed in a band-aid wrapping, inside of a brown envelope. Under the band-aid wrapping was a box with Cyrillic letters. Inside the box were pills varying in color stamped with a Telsa logo. Orange Teslas (suspected by agents to be MDMA) is advertised on the KindPeople vendor account.

Through my knowledge and speaking with other agents, I know that the appearance and markings match that of known MDMA. Additionally, an open-source query of the markings showed websites displaying MDMA pills that matches the color and markings of those seized from KOUDRATOV Parcel 4. While the pills for sale on KindPeople vendor account are orange, these pills can come in a variety of colors. Nevertheless, the Tesla logo remains the same. For those reasons, I believe the substance contained in KOUDRATOV Parcel 4 is MDMA.

37. Photographs of the suspected controlled substances found in the KOUDRATOV Parcels are shown below:



KOUDRATOV Parcel 1



KOUDRATOV Parcel 2



KOUDRATOV Parcel 3



KOUDRATOV Parcel 4

E. OFFICERS FIND BULK QUANTITIES OF CONTROLLED SUBSTANCES AT THE KOUDRATOV RESIDENCE AND IN THE KOUDRATOV VEHICLE

38. On September 16, 2024, the Hon. Stephanie S. Christensen, U.S. Magistrate Judge, authorized warrants to search the KOUDRATOV Residence, the KOUDRATOV Vehicle, KOUDRATOV's person, and CC-1's person. See Nos. 2:24-mj-05594, -05595, -05596, 05597 (C.D. Cal.).

39. Based on my person observations, my review of law enforcement records, and my communications with other officers, I know that on September 17, 2024, agents executed the warrants, finding the KOUDRATOV Vehicle near the KOUDRATOV Residence, and finding KOUDRATOV and CC-1 at the KOUDRATOV Residence. Inside the KOUDRATOV Vehicle, officers found the following in the trunk of the vehicle:

a. 1.92 kilograms (gross weight) of a white powdery substance, which later tested positive for cocaine in a field test using a TruNarc device.

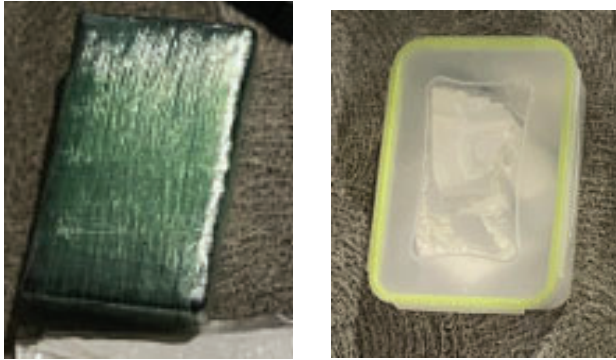
b. 2.72 kilograms (gross weight) of a white powdery substance tested positive for ketamine in a field test using a TruNarc device.

c. 495 grams (gross weight) of suspected Adderall. Through my knowledge and speaking with other agents, I know that the appearance and markings match that of known Adderall.

d. 4.9 kilograms (gross weight) of suspected MDMA pills varying in color stamped with a Tesla logo and MDMA powder. Through my knowledge and speaking with other agents, I know that the appearance and markings match that of known MDMA. Additionally, an open-source query of the markings showed websites displaying MDMA pills that matches the color and markings of those seized at the SUBJECT PREMISES.

e. A bottle of Alprazolam pills. Through my knowledge and speaking with other agents, I know that the appearance and markings match that of known Alprazolam.

40. Based on my review of law enforcement records, I know that some of the suspected cocaine, ketamine, Adderall, and MDMA found in the KOUDRATOV Vehicle are shown below:



Suspected Cocaine



Suspected Ketamine



Suspected Adderall



Suspected MDMA

41. Based on my person observations, my review of law enforcement records, and my communications with other officers, I know that officers found the following inside the KOUDRATOV Residence:

- a. A money counter in the bedroom closet.⁸
- b. Packaging materials with drug residue under the kitchen sink.
- c. Shipping labels in the living room.
- d. Bulk United States Currency.
- e. A large volume of cryptocurrency seed phrases and logins to cryptocurrency exchanges.⁹

42. Based on my review of law enforcement records, I know the money counter and bulk currency found in the KOUDRATOV Residence are shown below:



⁸ Based on my training and experience, individuals buying and selling large quantities of controlled substances often use money counters to keep track of the cash that they are spending and/or receiving.

⁹ Based on my personal observations and my communications with other officers, I also know that officers found the following inside the KOUDRATOV Residence approximately 2.83 kilograms (gross weight) of suspected hash oil in the kitchen cabinet, through my knowledge and speaking with other agents regarding the color and appearance of the liquid.

43. As set forth above, officers saw KOUDRATOV driving in the KOUDRATOV Vehicle on more than one occasion and location data also showed him moving with the vehicle. The KOUDRATOV Vehicle was registered to CC-1, who appeared to be living with and have a relationship with KOUDRATOV. In addition, as described above, officers saw the Vehicle Tracker on the KOUDRATOV Vehicle travel to the Lincoln PO, and then KOUDRATOV mailed from that location four packages containing meaningful quantities of controlled substances, which were the same substances for sale from the KINDPEOPLE account.¹⁰

V. CONCLUSION

44. For all of the reasons described above, there is probable cause to believe that KOUDRATOV has committed a violation of 21

¹⁰ Based on my communications with other law enforcement officers, I know that, while KOUDRATOV was detained on September 17, 2024, VCSO Officer-1 messaged the KINDPEOPLE Telegram account from which the officer had previously purchased narcotics, as described above. While KOUDRATOV was detained, the KINDPEOPLE account responded to the officer's message. Accordingly, I believe KOUDRATOV likely was not the sole person operating the account. In addition, based on my training and experience, dark web vendors and others who distribute large quantities of narcotics online often use multiple conspirators to send out the parcels of drugs.

U.S.C. § 841(a)(1) (distribution and possession with intent to distribute controlled substances).

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 18th day of September, 2024.



HON. PEDRO V. CASTILLO
UNITED STATES MAGISTRATE JUDGE