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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
BAILEY A. SZRAMOWSKI,  
Defendant.

Case No.: **25mj0040**

**COMPLAINT FOR VIOLATIONS OF**

Title 21, U.S.C., Sec. 841(a)(1) and (b)(1)(C)  
– Distribution of Fentanyl Resulting in Death

The undersigned complainant, being duly sworn, states:

On or about December 30, 2022, within the Southern District of California, defendant BAILEY A. SZRAMOWSKI did knowingly and intentionally distribute a mixture and substance containing a detectable amount of amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II Controlled Substance, which resulted in the death of another person, to wit: A.N.; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

1 The complainant further states that this complaint is based on the attached Probable  
2 Cause Statement, which is incorporated herein by reference.

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Steven R. Merklein  
HSI Special Agent

6 Sworn and attested to under oath by telephone, in accordance with Federal Rule of  
7 Criminal Procedure 4.1, this 6th day of January 2025.

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HON. KAREN S. CRAWFORD  
UNITED STATES MAGISTRATE JUDGE

1 Statement of Probable Cause

2 I, Steven R. Merklein, being duly sworn, declare and state as follows:

3 1. During the course of my duties, I have learned the following information from  
4 personal observation, reports prepared by other law enforcement agents and officers, and  
5 conversations with witnesses. Because this probable cause statement is being presented for  
6 the limited purpose of obtaining a criminal complaint, I have not included each and every  
7 fact made known to me during the course of this investigation. Rather, I am only including  
8 those facts which I believe are necessary for the issuance of a criminal complaint.

9 2. On January 3, 2023, A.N., a Sailor onboard the USS Abraham Lincoln, died  
10 of an apparent drug overdose. At the time of his death, A.N. was on leave and staying in  
11 an RV parked outside his aunt and uncle’s house in San Leandro, California. San Leandro  
12 Police Department (SLPD) officials searched the RV afterward and found evidence of drug  
13 use—specifically, a rolled-up dollar bill that had a white substance fall out when  
14 investigators handled it. The substance was not tested, and no other substances were seized  
15 from the vehicle. A toxicology report indicated that A.N.’s femoral blood tested positive  
16 for the presence of THC and fentanyl. A.N.’s autopsy report concluded he died of “acute  
17 fentanyl intoxication.”

18 3. Ten days after A.N.’s death, a second Sailor stationed onboard the USS  
19 Abraham Lincoln, C.L., was transported to the hospital after an apparent drug overdose.  
20 Before being transported, C.L. was administered NARCAN nasal spray, a prescription  
21 medicine commonly used to treat opiate overdose emergencies, including acute fentanyl  
22 intoxication. C.L. survived the overdose and remained in the hospital under observation  
23 until January 17, 2023. The day after his release, C.L. agreed to cooperate with an NCIS  
24 investigation of drug distribution activities on the USS Abraham Lincoln and the  
25 circumstances of A.N.’s death. C.L. identified A.N. and another US Navy servicemember,  
26 Bailey A. SZRAMOWSKI, as individuals who had been actively selling Percocet pills  
27 (likely counterfeit M30 pills) to other sailors, including himself, for approximately the prior  
28 year.

1           4.       C.L. claimed to have purchased pills from SZRAMOWSKI approximately 10  
2 times during the USS Abraham Lincoln’s 2022 deployment and an additional four times  
3 after the ship returned to San Diego, California, including on January 13, 2023, the day of  
4 his overdose. According to C.L., SZRAMOWSKI sourced the pills—described as small,  
5 blue pills with the number “30” inscribed on them—via the mail (USPS) and received them  
6 at a P.O. box in Coronado, California. C.L. and other sailors would pay SZRAMOWSKI  
7 for the pills via CashApp. C.L. reported that, on the day of his first NCIS interview (January  
8 18, 2023), he participated in a three-way call via Instagram with SZRAMOWSKI and his  
9 spouse, J.P. During the call, SZRAMOWSKI instructed C.L. to lie to law enforcement by  
10 stating he obtained the pills in question from A.N. rather than SZRAMOWSKI.

11           5.       On February 1, 2023, NCIS agents interviewed L.P. and K.P., A.N.’s aunt and  
12 uncle who were the first witnesses to his death in the RV outside their house a month  
13 earlier. They reported that, after the incident, SZRAMOWSKI told them via telephone to  
14 delete the messages on A.N.’s phone between himself and A.N., but they declined to do  
15 so. According to L.P. and K.P., SZRAMOWSKI further stated that he “might go down for  
16 murder” or it would “ruin his future” or words to that effect if the police found the  
17 messages.

18           6.       On February 7, 2023, NCIS agents interviewed G.G., the former fiancé of  
19 A.N. She said that SZRAMOWSKI would order Percocet pills online and have them  
20 delivered to a P.O. Box at a Postal Annex in Coronado, California. He would then sell the  
21 pills to A.N. and other sailors for profit and would also use them recreationally. G.G. stated  
22 that she personally witnessed A.N. and SZRAMOWSKI abuse drugs, including Percocet  
23 pills, which they would ingest orally or snort in crushed form. She also was aware that  
24 A.N. regularly used cocaine, and she witnessed SZRAMOWSKI selling cocaine on one  
25 occasion via Facetime. G.G. reported that she traveled with A.N. to his family home in  
26 Northern California on December 30, 2022. On the drive, she observed that A.N. had a  
27 small bag of 10 “Percocet” pills he claimed to have sourced from SZRAMOWSKI for  
28 \$100. According to G.G., after A.N.’s death, she went through his belongings and found

1 the pills but there were only nine left, implying that he consumed one of the pills before  
2 his death. G.G. further reported that she spoke with SZRAMOWSKI over the phone just  
3 after A.N.'s body was discovered, and SZRAMOWSKI told G.G. to administer NARCAN  
4 to A.N. In a subsequent call after G.G. took possession of A.N.'s phone, SZRAMOWSKI  
5 reportedly asked her to delete the text messages between him and A.N., claiming that  
6 otherwise "he would go down for murder," or words to that effect. G.G. reported that in  
7 another phone call, SZRAMOWSKI's spouse, J.P., told her that the pills SZRAMOWSKI  
8 provided to A.N. were laced with fentanyl and the pills he provided C.L. were from the  
9 same batch. In a subsequent interview, G.G. reported that, on February 27, 2023,  
10 SZRAMOWSKI admitted to her in person that he gave A.N. the fentanyl-laced pills that  
11 caused his death, but he claimed, "it wasn't [his] fault" because he "told [A.N.] the pills  
12 were different," implying that A.N. had fair warning of the lethal nature of the pills he had  
13 purchased from SZRAMOWSKI.

14 7. As part of its investigation, NCIS performed a forensic extraction and  
15 examination of A.N.'s cell phone. The examination revealed that from September through  
16 December 2022, SZRAMOWSKI and A.N. regularly discussed drug use and drug sales—  
17 including "perc[s]," "coca," "coke," "blow," "vics," "hydrocodone," "lsd," "shrooms," and  
18 "ecstasy." They also occasionally filmed themselves using drugs. During a review of  
19 A.N.'s CashApp account records, NCIS agents discovered a \$100 payment from A.N. to  
20 SZRAMOWSKI on December 30, 2022. On January 3, 2023, the day of A.N.'s death,  
21 SZRAMOWSKI texted G.G. and instructed her to "[g]et [A.N.'s] phone" and "delete mine  
22 and his msgs" so that law enforcement would not find them, which he claimed would result  
23 in SZRAMOWSKI "go[ing] to prison" and "go[ing] down for murder."

24 8. Based on the facts of this investigation, I believe there is probable cause to  
25 believe that SZRAMOWSKI violated 21 U.S.C. §§ 841(a)(1), (b)(1)(C) – Distribution of  
26 Fentanyl Resulting in Death.

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