

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Carolyn HERNANDEZ-TAYLOR

Case: 2:22-mj-30354

Assigned To : Unassigned

Assign. Date : 8/22/2022

CMP: USA v CAROLYN HERNANDEZ (MAW)

CRIMINAL COMPLAINT

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(s) of January 2022 through June 2022 in the county of Wayne in the Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. §§ 846 and 841	Conspiracy to possess with the intent to distribute controlled substances, unlawful possession with intent to manufacture, distribute, or dispense a controlled substance

This criminal complaint is based on these facts:

See attached Affidavit

Continued on the attached sheet.

Sworn to before me and signed in my presence and/or by reliable electronic means.

Date: August 22, 2022

City and state: Detroit, MI

Jennifer Schlaufman

Complainant's signature

Task Force Officer Jennifer Schlaufman, HSI

Printed name and title

Elizabeth A. Stafford

Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Jennifer Schlaufman, being first duly sworn, hereby depose and state as follows:

Introduction and Agent Background

1. I am a Task Force Officer with Homeland Security Investigation's (HSI) and have been since April 2019. I am also a peace officer with the State of Michigan Department of State Police and have been since June 1997. I have participated in several investigations involving the possession, manufacture, distribution and importation of controlled substances, as well as methods used to finance drug transactions and launder drug proceeds. I have attended schools and have been instructed in many aspects of narcotics investigations. I am currently assigned to the Detroit Dark Web Task Force (DDWTF). I, and the agents and police officers I work with, are familiar with the methods of drug organizations and their operations, the terminology used, and the scope of their influence. Through my education and experience, and that of other agents assisting in this investigation, I have become familiar with the methods that individuals use to traffic narcotics into and throughout the United States.

2. The information set forth in this affidavit is based upon my knowledge and investigation, as well as investigations conducted by fellow law enforcement officers. I know it is a violation of law to knowingly and intentionally manufacture,

distribute, or dispense, or possess with intent to manufacture, distribute, or dispense a controlled substance, to wit: Cocaine. This affidavit is being submitted for the limited purpose of establishing probable cause to support issuing a criminal complaint, and therefore does not include all the facts that have been gathered during the course of the investigation

Investigation Summary

3. In 2018, HSI Detroit's Dark Web Task Force (DDWTF), consisting of investigators from HSI, USSS, IRS, CBP, USPIS and MSP identified Victor HERNANDEZ, et al., of Detroit, Michigan as operating as large-scale dark web drug vendor "opiateconnect".
4. The investigation has shown that opiateconnect has been a dark web drug vendor since at least 2016 and has operated on most major dark web marketplaces. Currently, in addition to selling high volumes of drugs, including pure/uncut cocaine and pressed Xanax on various dark web marketplaces, opiateconnect also sells to customers on his own onion site and via Jabber direct messaging.
5. The DDWTF has identified several members of this organization, including Carolyn HERNANDEZ-TAYLOR, as well as many locations used to receive drugs/supplies, process/manufacture drugs.
6. Investigative findings have identified TAYLOR as one of the most active

members of the opiateconnect organization. TAYLOR has been routinely observed spending considerable amounts of time, multiple days per week, at the suspected drug processing/packaging location used by opiateconnect.

7. DDWTF surveillance has shown when TAYLOR leaves the drug packaging/processing location, she often exits with one or more garbage bags full of drug parcels for mailing to dark web customers around the United States. The DDWTF has observed these parcels being mailed and have seized several packages, all of which contained drugs sold by opiateconnect, including cocaine and pressed Xanax.

8. The DDWTF has identified Elizabeth Lynn-Maire ALVAREZ-GARCIA as an associate of TAYLOR. ALVAREZ-GARCIA receives drug parcels from TAYLOR and mails them from the post office in Lincoln Park, Michigan.

Surveillance and Mailing of Suspected Drug Parcels

9. On December 2, 2021, the DDWTF established surveillance at ALVAREZ-GARCIA's residence in Lincoln Park and observed ALVAREZ-GARCIA'S Jeep Patriot (MI EJP3671) parked in front of her apartment building.

10. The DDWTF observed a blue 2017 Ford Fusion bearing Michigan license plate number EKT2089, registered to Carolyn TAYLOR 4381 Parkinson Street in Detroit, pull into the apartment complex parking lot and parked behind ALVAREZ-

GARCIA's black Jeep. The female driver remained in the car and appeared to be waiting.

11. ALVAREZ-GARCIA exited her apartment building and approached the blue Fusion and spoke with the driver through the vehicle window. After a few seconds, ALVAREZ-GARCIA opened the back hatch of her Jeep as well as the trunk of the Fusion. ALVAREZ-GARCIA retrieved a black (semi-full) garbage bag from the Fusion trunk and placed it in the back of her Jeep. ALVAREZ-GARCIA closed the Jeep's hatch and the Fusion's trunk. ALVAREZ-GARCIA spoke with the Fusion driver for another moment before entering the driver's seat of her Jeep. The Fusion exited the parking lot and drove to a neighborhood in southwest Detroit where surveillance was terminated.

12. Shortly after the Fusion departed, ALVAREZ-GARCIA exited the apartment parking lot and drove to the Lincoln Park post office. ALVAREZ-GARCIA exited her Jeep and retrieved the black garbage bag from the back of the vehicle. ALVAREZ-GARCIA entered the post office with the bag and mailed thirteen (13) parcels.

13. While ALVAREZ-GARCIA was in the post office mailing the parcels, DDWTF member SA Edmond Rose drove by 4381 Parkinson Street and identified Carolyn TAYLOR sitting in the driver's seat of the parked Ford Fusion.

Surveillance and Seizure of Drug Parcel

14. On December 6, 2021, the DDWTF established surveillance at ALVAREZ-GARCIA'S apartment building in Lincoln Park, ALVAREZ-GARCIA's black Jeep Patriot was parked in front of the apartment building.

15. The DDWTF observed a blue Ford Fusion, arrive and back into a parking spot next to ALVAREZ-GARCIA's Jeep. ALVAREZ-GARCIA exited the apartment building approached the Fusion, opened the trunk and removed two full black trash bags from the trunk.

16. ALVAREZ-GARCIA placed the trash bag into the back-hatch area of her Jeep. ALVAREZ-GARCIA closed the back hatch of her Jeep and the trunk of the Fusion. The Fusion and the Jeep departed the parking lot. ALVAREZ-GARCIA, driving the Jeep, drove to the Lincoln Park post office.

17. The DDWTF observed ALVAREZ-GARCIA enter the Lincoln Park post office carrying two black trash bags. ALVAREZ-GARCIA mailed approximately two dozen parcels of various sizes.

18. Shortly after ALVAREZ-GARCIA departed the post office, SA Rose (United States Postal Service Office of Inspector General) entered the Lincoln Park post office and examined the parcels mailed by ALVAREZ-GARCIA. SA Rose selected a parcel for further inspection. After obtaining a federal search warrant, the parcel was opened and found to contain 1221 pressed blue B707 bars, counterfeit

alprazolam bars. The bars were sent to the Michigan State Police Metro Detroit Forensic Laboratory and found to contain Clonazepam, which is not a scheduled controlled substance and is not FDA approved for medical use in the United States.

(Note: Clonazepam is a dangerous and understudied benzodiazepine, classification of drugs. Clonazepam (known on the street as Clon, Clam, or C-lam) is more than twice as strong as Xanax (alprazolam) and is the preferred active ingredient of pressed Xanax sold on the dark web). Clonazepam is not FDA approved, and thus illegal to consume and import into the United States

Surveillance and Seizure of Drug Parcel

19. On January 18, 2022, the DDWTF initiated surveillance at 4381 Parkinson Street, Detroit, Michigan on the blue Ford Fusion, registered to Carolyn TAYLOR at 4381 Parkinson Street.

20. TAYLOR was observed crossing the street from 4381 Parkinson Street and entering the Fusion. TAYLOR departed and drove to 5852 Florida Street in Detroit and parked behind the house. A white Dodge Ram belonging to Victor HERNANDEZ was also in the residence driveway.

21. TAYLOR, driving the Fusion, exited the driveway of 5852 Florida Street and was followed closely by an older red Chevy Trail Blazer driven by a heavy-set Hispanic male. TAYLOR drove through southwest Detroit neighborhoods and side streets, followed by the red Blazer. Close surveillance was terminated, as it appeared

TAYLOR was executing counter-surveillance techniques.

22. The DDWTF re-established surveillance at ALVAREZ-GARCIA's apartment building in Lincoln Park and observed TAYLOR, driving her Fusion, arrive and park near ALVAREZ-GARCIA's Jeep Patriot. After several minutes, ALVAREZ-GARCIA exited her apartment building, TAYLOR opened the trunk of the Fusion, removed two full trash bags and placed them in the rear hatch area ALVAREZ-GARCIA's Jeep. ALVAREZ-GARCIA then retrieved a third trash bag from the back of the Fusion and placed it in the front passenger side of her of her Jeep. TAYLOR and ALVAREZ-GARCIA spoke for several minutes before both departed the apartment parking lot.

23. ALVAREZ-GARCIA arrived at the Lincoln Park post office, followed by TAYLOR. ALVAREZ-GARCIA parked her Jeep, removed the full trash bag from her front passenger seat and carried it into the post office; TAYLOR departed the post office parking lot.

24. A short time later ALVAREZ-GARCIA returned to her Jeep with a mail cart. ALVAREZ-GARCIA removed two full trash bags from the rear of the Jeep and placed them on the cart. ALVAREZ-GARCIA returned to the post office and mailed several dozen parcels. After mailing the parcels, ALVAREZ-GARCIA exited the post office, entered her Jeep and departed the area.

25. After ALVAREZ-GARCIA left the post office, SA Rose entered the Lincoln

Park post office and examined the parcels mailed by ALVAREZ-GARCIA. SA Rose selected one of the parcels for inspection. After obtaining a federal search warrant, a searched the package and found it to contain 111 blue B707, counterfeit alprazolam bars, like those listed on the dark web by opiateconnect. The bars were sent to the Michigan State Police Metro Detroit Forensic Laboratory for analysis and found to contain Clonazepam.

Surveillance and Mailing of Suspected Drug Parcels

26. On February 7, 2022, the DDWTF established surveillance at 5852 Florida Street in Detroit. The Ford Fusion belonging to TAYLOR was parked in the driveway next to HERNANDEZ's white Dodge Ram pickup truck.

27. The DDWTF observed a red Chevrolet Trailblazer, bearing Michigan license plate number DPF851, registered to Salvador RIVAS at 4381 Parkinson Street in Detroit, Michigan and driven by Salvador RIVAS, parked directly across the street from 5852 Florida Street RIVAS remained in the vehicle.

28. The DDWTF observed the Fusion, driven by TAYLOR pull out of the driveway. RIVAS, driving the red Chevy Trailblazer, pulled in behind TAYLOR and followed her through the neighborhood. RIVAS and TAYLOR drove in tandem for several blocks.

29. The DDWTF had also established surveillance at ALVAREZ-GARCIA's apartment building in Lincoln Park and observed TAYLOR pull into the parking lot

and park next to the black Jeep Patriot belonging to ALVAREZ-GARCIA.

30. ALVAREZ-GARCIA exited her apartment building and walked toward her vehicle. As ALVAREZ-GARCIA approached her Jeep the trunk of the Fusion opened. ALVAREZ-GARCIA opened the back hatch of the Jeep and retrieved two full black trash bags from the trunk of the Fusion and placed them in the back of her Jeep. After closing the trunk of the Fusion and the back hatch of the Jeep, ALVAREZ-GARCIA entered the driver's seat of the Jeep. Both ALVAREZ-GARCIA and TAYLOR spoke for several minutes from their vehicles.

31. ALVAREZ-GARCIA and TAYLOR exited the apartment parking lot in their respective vehicles. ALVAREZ-GARCIA drove to the Lincoln Park post office where she parked her Jeep, retrieved the two full trash bags from the back of her Jeep and entered the post office. In the post office, ALVAREZ-GARCIA mailed dozens of parcels.

Undercover Purchase of Cocaine from Opiateconnect

32. On February 18, 2022, the DDWTF initiated an undercover (UC) purchase of cocaine from dark web drug vendor opiateconnect369, aka opiateconnect on Dark0de market. The UC order was for 3.5 grams of cocaine for \$275, plus \$10 shipping. The purchase was made with bitcoin.

33. On February 22, 2022, the DDWTF initiated surveillance near the 5852 Florida Street in Detroit and observed HRENANDEZ's Dodge Ram pickup truck as well as TAYLOR's Ford Fusion were parked in the driveway. A white Dodge Ram belonging to Victor HERNANDEZ was also in the residence driveway. Surveillance was also established at ALVAREZ-GARCIA's apartment building in Lincoln Park. ALVAREZ-GARCIA's Jeep was in the parking lot.

34. The DDWTF observed ALVAREZ-GARCIA enter her Jeep Patriot, with a child, and drive to the alley/driveway behind 919 Livernois Avenue in Detroit. ALVAREZ-GARCIA and her child walked toward the residence through the garage. This location has previously been identified as the residence of ALVAREZ-GARCIA's parents.

35. Shortly after ALVAREZ-GARCIA arrived at her parent's residence, the red Chevy Trailblazer driven by Salvador RIVAS parked on the street near the 5852 Florida Street within several moments of RIVAS arriving in the red Trailblazer, TAYLOR, driving the Fusion, exited the driveway and RIVAS followed her.

36. The vehicles drove in tandem to the alley/driveway behind 919 Livernois Avenue in Detroit. TAYLOR entered the alley and parked next to ALVAREZ-GARCIA's Jeep Patriot, RIVAS drove past the alley and departed the area. A few seconds later, ALVAREZ-GARCIA walked out of the garage toward her Jeep and the Fusion, which were parked side-by-side in the alley.

37. TAYLOR exited her car and opened the trunk of the Fusion and the back hatch of the Jeep Patriot. ALVAREZ-GARCIA and TAYLOR walked behind the vehicles for a moment (view blocked), then closed the vehicle trunks. ALVAREZ-GARCIA entered their respective vehicles and departed the alley.

38. TAYLOR followed ALVAREZ-GARCIA to the Lincoln Park Post Office. ALVAREZ-GARCIA entered the post office parking lot and parked; TAYLOR drove past the post office and departed the area.

39. ALVAREZ-GARCIA exited her Jeep and retrieved two large, full trash bags from the rear hatch area of her Jeep. ALVAREZ-GARCIA carried the bags into the post office and mailed dozens of parcels. After mailing, ALVAREZ-GARCIA departed the post office and left the area in her Jeep. Immediately after ALVAREZ-GARCIA departed the post office, SA Rose entered the post office and reviewed the dozens of packages mailed by ALVAREZ-GARCIA. One of the parcels was addressed to the DDWTF undercover name/address used to order cocaine from opiateconnect. SA Rose took possession of the package for inspection by the

DDWTF.

40. On February 23, 2022, the DDWTF opened the parcel mailed by ALVAREZ-GARCIA and found it to contain the cocaine ordered from opiateconnect. The cocaine was sent to the Michigan State Police Metro Detroit Forensic Laboratory for analysis and was found to be Cocaine, schedule II controlled substance.

Electronic Surveillance

41. On March 1, 2022, the DDWTF, secured a warrant to initiate electronic surveillance of the 2007 blue Ford Fusion owned and operated by Carolyn TAYLOR. The electronic surveillance began on March 8, 2022 and continued to the present date.

42. This electronic surveillance supplemented already existing video surveillance in place at the Lincoln Park post office and the alley behind 919 Livernois in Detroit.

43. On March 29, 2022, electronic surveillance showed the Fusion arrive in an alley behind 919 Livernois in Detroit. The Fusion and ALVAREZ-GARCIA's vehicle were observed, via video surveillance, in the alley. ALVAREZ-GARCIA and TAYLOR were observed in the alley moving large black trash bags from the Fusion to ALVAREZ-GARCIA's Jeep. A total of four (4) trash bags were transferred from TAYLOR's Fusion to ALVAREZ-GARCIA's Jeep, both vehicles then departed the alley. Electronic surveillance showed the Fusion departed the alley and next stopped at the Lincoln Park post office. SA Rose, via video surveillance,

observed TAYLOR and ALVAREZ-GARCIA both inside of the Lincoln Park post office and each of them carrying two (2) large trash bags up to the clerk at the counter to mail the contents inside the trash bags.

Surveillance and Seizure of Cocaine

44. On April 13, 2022, the DDWTF, with assistance from U.S. Customs Border Protection (CBP) Aviation Support, initiated surveillance at 5852 Florida Street in Detroit. Your AFFIANT was in the CBP helicopter during the surveillance and observed Carolyn TAYLOR exit the rear door at 5852 Florida Street carrying a large black full trash bag and placed it into her blue Ford Fusion. TAYLOR made two additional trips from the back door to the Fusion each time placing a large full trash bag into the Fusion.

45. Surveillance was maintained on the Fusion as it departed the 5852 Florida Street and drove to the alley behind 919 Livernois in Detroit. Your AFFIANT observed the Fusion and ALVAREZ-GARCIA's vehicle parked in the alley. ALVAREZ-GARCIA and TAYLOR were observed moving the three large trash bags from the Fusion to ALVAREZ-GARCIA's vehicle. Your AFFIANT observed both vehicles depart the alley and drive to the Lincoln Park post office. Your AFFIANT observed ALVAREZ-GARCIA remove two of the large trash bags from her vehicle and take them inside the post office. Your AFFIANT observed ALVAREZ-GARCIA exit the post office and retrieve the third trash bag and take it

into the post office.

46. SA Rose selected one of the parcels mailed by ALVAREZ-GARCIA for examination. After receiving a federal search warrant, SA Rose and SA O'Hare opened the package and found a vacuum sealed plastic bag containing a white pressed powder suspected to be cocaine. The laboratory results, from the Michigan State Police Metro Detroit Forensic Laboratory, confirmed the pressed powder to be cocaine, a schedule II controlled substance, with a total weight of 14.7grams.

Undercover Purchase of Cocaine from Opiateconnect

47. On April 30, 2022, the DDWTF initiated an undercover purchase of cocaine from the dark web drug vendor opiateconnect on opiateconnect's private onion site, located on the TOR network.

48. An order was placed for 14 grams and 7 grams of cocaine using an undercover address maintained by the DDWTF. The DDWTF retrieved the undercover purchase from the undercover address on May 9, 2022. The package tracking number showed the package was mailed on May 6, 2022, at 10:49 a.m. from the Lincoln Park post office. The package was opened by SA O'Hare and Your AFFIANT. The package contained two separate vacuum sealed clear plastic bags each containing a pressed white powder suspected of being cocaine. Laboratory analysis confirmed the pressed powder to be cocaine, a schedule II controlled substance, with total weights of 13.71 grams and 7.11 grams.

Surveillance and Mailing of Suspected Drug Parcels

49. On May 2, 2022, the DDWTF surveillance at 5852 Florida Street in Detroit. TAYLOR's blue Ford Fusion was observed at the residence as well as the white Dodge Ram registered to Victor HERNANDEZ.

50. TAYLOR, driving the Fusion, was observed exiting the driveway. TAYLOR drove to the alley behind 919 Livernois Avenue in Detroit where ALEVEREZ-GARCIA's Jeep Patriot was located.

51. The DDWTF observed the transfer of two large black trash bags from the Fusion to ALEVEREZ-GARCIA's Jeep. Both vehicles departed the alley and drove, in tandem, to the Lincoln Park post office.

52. The DDWTF observed ALVAREZ-GARCIA take the two large full trash bags into the post office where she mailed dozens of suspected drug parcels.

Surveillance and Seizure of Drug Parcel

53. On June 3, 2022, the DDWTF established mobile, video, and electronic surveillance at 5852 Florida Street in Detroit. TAYLOR's blue Ford Fusion was observed at the residence as well as the white Dodge Ram registered to Victor HERNANDEZ.

54. Carolyn TAYLOR was observed exiting the back door of the residence with one partially full black trash bag which she placed into the trunk of her Fusion.

TAYLOR, driving the Fusion, was observed exiting the driveway of the residence.

55. TAYLOR was followed by a black two-door Mercedes bearing Michigan license plate number 7NGT26 (registered to Ruben Rivas, 4381 Parkinson Street, Detroit, MI. windows had dark tint).

56. The Fusion and Mercedes drove, in tandem, to ALVAREZ-GARCIA's apartment complex in Lincoln Park. TAYLOR entered the apartment building parking lot and parked next to ALVAREZ-GARCIA's black Jeep Patriot; the black Mercedes continued past and departed the area.

57. TAYLOR and ALVAREZ-GARCIA met in the apartment building parking and transferred the garbage bag from the Fusion to the Jeep.

58. ALVAREZ-GARCIA and TAYLOR departed the apartment building parking lot separately; ALVAREZ-GARCIA drove to the Lincoln Park post office where she mailed several suspected drug parcels. TAYLOR departed the area drove to 4831 Parkinson Street in Detroit.

59. After ALVAREZ-GARCIA exited the post office, members of the DDWTF viewed the parcels mailed by ALVAREZ-GARCIA and selected one for further inspection. After obtaining a federal search warrant, a search of the package found it to contain green pills identical to the those sold by opiateconnect. Lab analysis conducted by the Michigan State Police Metro Detroit Lab showed the pills

contained Clonazepam.

Summary of Electronic and Video Surveillance of TAYLOR

60. Continuous electronic surveillance, over the course of several weeks, of TAYLOR's Ford Fusion, coupled with video surveillance at opiateconnect drug processing/packaging location on Florida Street in Detroit, video surveillance behind 919 Livernois in Detroit and video surveillance at the Lincoln Park post office, shows a consistent and frequent pattern:

61. TAYLOR leaves her residence, located at 4381 Parkinson Street in Detroit, on weekday mornings and drives to 5852 Florida Street in Detroit. TAYLOR parks near the back door of 5852 Florida Street and enters the residence via the front door. After a period of time, often a few hours, TAYLOR exits the back door of the residence with full black trash bags and places them in her Ford Fusion.

62. TAYLOR leaves 5852 Florida Street and drives to either 919 Livernois Avenue in Detroit (ALVAREZ-GARCIA's parent's residence) or to ALVAREZ-GARCIA's apartment complex in Lincoln Park. After a few moments at these locations, ALVAREZ-GARCIA arrives at the U.S. Post Office in Lincoln Park with full garbage bags and mails dozens of suspected drug parcels.

63. This pattern had been corroborated with physical surveillance by the DDWTF.

Conclusion

Based on the foregoing, I have probable cause to believe, and I do believe, TAYLOR has committed, is committing, and will continue to commit violations of 21 U.S.C. §§ 846 and 841 (conspiracy to possess with the intent to distribute controlled substances, unlawful possession with intent to manufacture, distribute, or dispense a controlled substance).

Request for Sealing

It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested search warrant, including the application, this affidavit, the attachments, and the requested search warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time may endanger the life or physical safety of an individual, cause flight from prosecution, cause destruction of or tampering with evidence, cause intimidation of potential witnesses, or otherwise seriously jeopardize an investigation.

Premature disclosure of the contents of the application, this affidavit, the attachments, and the requested search warrant may adversely affect the integrity of the investigation.

Respectfully submitted,

Jennifer Schlaufman

Jennifer Schlaufman

Task Force Officer

Homeland Security Investigations

Elizabeth A. Stafford

Hon. Elizabeth A. Stafford

United States Magistrate Judge