

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
Victor HERNANDEZ

Case: 2:22-mj-30357
Assigned To : Unassigned
Assign. Date : 8/23/2022
CMP: USA v VICTOR 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 August 2022 in the county of Wayne in the Eastern District of Michigan, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Row 1: 21 U.S.C. §§ 846 and 841, Conspiracy to possess with the intent to distribute controlled substances... Row 2: 18 U.S.C. §§ 922 and 924(c), Felon in possession of a firearm; using a firearm in furtherance of a drug trafficking crime.

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 23, 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 and alprazolam. This affidavit is being submitted for the limited purpose of establishing probable cause

Case 2:22-cr-20450-LVP-DRG ECF No. 1, PageID.3 Filed 08/23/22 Page 3 of 5
to support issuing a criminal complaint, and therefore does not include all the facts
that have been gathered during the course of the investigation.

Applicable Law

3. The Controlled Substances Act (CSA) is the statute establishing federal U.S. drug policy under which the manufacture, importation, possession, use and distribution of certain substances is regulated. The CSA classified drugs into five schedules. Cocaine is a Schedule II and Alprazolam is a Schedule IV “controlled substance” within the meaning of 21 U.S.C. § 802; it is unlawful for any person to knowingly or intentionally manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance.

Investigation Background

4. Investigators have identified Victor HERNANDEZ as a dark web market supplier of scheduled and counterfeit controlled substances. HERNANDEZ uses the moniker of opiateconnect or opiateconnect369 to anonymously sell the drugs on the dark web. From at least January, 2022, investigators have seized multiple drug parcels which surveillance confirms originated from 5852 Florida Street, in Detroit, Michigan. These parcels have contained various controlled substances, including Cocaine.

Search Warrant and Seizure of Narcotics

5. On Tuesday August 23, 2022, the DDWTF executed a federal search warrant at the residence of Victor HERNANDEZ located at 5852 Florida Street in Detroit, Michigan. During the search, agents found a clandestine pill

agents and active ingredients for making counterfeit alprazolam bars (clonazolam, etizolam) and bulk pressed counterfeit alprazolam bars.

6. Additionally, agents discovered a large quantity of a white powdery substance, that field tested positive for cocaine and a powdery substance that field tested positive for MDMA.

7. In addition to the lab and drugs, agents seized bulk U.S. currency and multiple firearms.

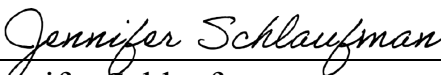
8. Moreover, investigators recovered packaging materials, to include a label maker, as well as evidence of multiple of parcel mailings.

9. At the time of the warrants, Victor HERNANDEZ was present at the residence. HERNANDEZ acknowledged that he rents the residence and is the sole occupant.

10. A criminal history check revealed that HERNANDEZ is a convicted felon and is prohibited from possessing any firearms.


Based on the foregoing, I have probable cause to believe HERNANDEZ has committed violations of 21 U.S.C. §§ 841 and 846 (conspiracy to possess with the intent to distribute controlled substances, unlawful possession with intent to manufacture, distribute, distribute, or dispense a controlled substance), as well as 18 U.S.C. §§ 922 and 924(c).

Respectfully submitted,



Jennifer Schlaufman
Task Force Officer
Homeland Security Investigations

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



Hon. Elizabeth A. Stafford
United States Magistrate Judge

Date: August 23, 2022