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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

U.S. DISTRICT COURT  
SOUTHERN DIST OHIO  
WESTERN DIVISION CINCINNATI

UNITED STATES OF AMERICA,

CASE NO.

**1:19CR136**

Plaintiff,

INDICTMENT JUDGE BLACK

v.

KHLARI SIROTKIN (1)

18 U.S.C. § 2

a/k/a "Khlari Sirota," "Khlari Eleazor

18 U.S.C. § 1956(h)

Isbell SIROTKIN," "Klizo," "Sirota,"

18 U.S.C. § 982(a)(1)

"Kliz," "Killa B," "Slanggang," and

18 U.S.C. § 982(b)(1)

"@SlangGangRick,"

21 U.S.C. § 321 (g)(2)

21 U.S.C. § 331(i)(3)

KELLY STEPHENS (2)

21 U.S.C. § 333(b)(8)

a/k/a "Kelly E Stephens," "Kelly

21 U.S.C. § 841(a)(1)

Shea," "Kelly Comatose," "Killa

21 U.S.C. § 841(b)(1)(A)

Kells," "Kel," "Slanggang,"

21 U.S.C. § 841(b)(1)(B)

"@SlangGangRick," and

21 U.S.C. § 841(b)(1)(C)

"oxxxymoron,"

21 U.S.C. § 846

21 U.S.C. § 853(a) and (p)

SEAN DEAVER (3)

a/k/a "Sean Deavers," "Sean Patrick

Notice of Forfeiture

Deaver," "Fatz," "Fats," "Phatz,"

"Interstatefatz," "PillCosby," and

"Pill-Cosby,"

ABBY JONES (4)

a/k/a "PillCosby," "Pill-Cosby," and

"Abby Phatz,"

SASHA SIROTKIN (5) a/k/a "Sasha

Sirota,"

Defendants.

THE GRAND JURY CHARGES THAT:

INTRODUCTORY ALLEGATIONS

At all times material to this Indictment, beginning in 2018 and continuing until the present there has been a joint investigation commenced by: the Federal Bureau of Investigation (FBI), the

Food and Drug Administration (FDA), the United States Postal Inspection Service (USPIS), the Drug Enforcement Administration (DEA), the Homeland Security Investigation (HSI), Ohio Bureau of Criminal Investigation (BCI), and the Cincinnati Police Department (CPD), regarding **KHLARI SIROTKIN** a/k/a “**Khleri Sirota**,” “**Khleri Eleazor Isbell SIROTKIN**,” “**Klizo**,” “**Sirota**,” “**Kliz**,” “**Killa B**,” “**Slanggang**,” and “**@SlangGangRick**,” **KELLY STEPHENS** a/k/a “**Kelly E Stephens**,” “**Kelly Shea**,” “**Kelly Comatose**,” “**Killa Kells**,” “**Kel**,” “**Slanggang**,” “**@SlangGangRick**,” and “**oxxymoron**,” **SEAN DEEVER** a/k/a “**Sean Deavers**,” “**Sean Patrick Deaver**,” “**Fatz**,” “**Fats**,” “**Phatz**,” “**Interstatefatz**,” “**PillCosby**,” and “**Pill-Cosby**,” **ABBY JONES** a/k/a “**PillCosby**,” “**Pill-Cosby**,” and “**Abby Phatz**,” **SASHA SIROTKIN** a/k/a “**Sasha Sirota**” and others (hereinafter, collectively, the “*PillCosby-Slanggang Drug Trafficking Organization*” or the “*PC-SG DTO*”).

At all times material to this Indictment, the following persons participated in the dark web narcotics trafficking and money laundering activities discussed herein:

- (1) **KHLARI SIROTKIN** a/k/a “**Khleri Sirota**,” “**Khleri Eleazor Isbell SIROTKIN**,” “**Klizo**,” “**Sirota**,” “**Kliz**,” “**Killa B**,” “**Slanggang**,” and “**@SlangGangRick**”, among other things:
  - a. serves as a key leader within the *PC-SG DTO*;
  - b. guides others (e.g., **KELLY STEPHENS**), on how to operate the *PC-SG DTO* vendor accounts;
  - c. is responsible for the handling of cryptocurrency obtained from *PC-SG DTO* online drug sales with **SEAN DEEVER**;
  - d. “mixes” [in order to obfuscate] “coins” (cryptocurrencies) prior to purchasing “labels” (shipping labels) for the *PC-SG DTO* and
  - e. acquires and liquidates cryptocurrencies for the *PC-SG DTO*.

(2) **KELLY STEPHENS** a/k/a “Kelly E Stephens,” “Kelly Shea,” “Kelly Comatose,” “Killa Kells,” “Kel,” “*Slanggang*,” “*@SlangGangRick*,” and “*oxxxymoron*”, among other things:

- a. performs key roles for the *PC-SG DTO*;
- b. assists **KHLARI SIROTKIN** in operation of the *Slanggang* vendor account and *Slanggangcentral* Wickr room, using technical knowledge to operate the online account and handling customer service issues as they may arise; and
- c. is a close associate to **KHLARI SIROTKIN** and is an equal partner in the operation of *Slanggangcentral*.

(3) **SEAN DEEVER** a/k/a “Sean Deavers,” “Sean Patrick Deaver,” “Fatz,” “Fats,” “Phatz,” “Interstatefatz,” “*PillCosby*,” and “*Pill-Cosby*”, among other things:

- a. is a key leader within the *PC-SG DTO*;
- b. is one of the main long-term drug sources of supply for the *PC-SG DTO*;
- c. with **ABBY JONES** actively operates the *Pill-Cosby* vendor account and supplies drugs to the entire *PC-SG DTO*; and
- d. manages the cryptocurrencies acquired from the *Pill-Cosby* vendor account and converts this asset into fiat currency.

(4) As to **ABBY JONES** a/k/a “*PillCosby*,” “*Pill-Cosby*,” and “**Abby Phatz**”, other things:

- a. assists **SEAN DEEVER** in the operation of *PC-SG DTO* vendor accounts;
- b. is the primary manager for acquiring shipping labels used by the *PC-SG DTO* to mail drug parcels through the United States Postal System (USPS); and
- c. actively communicates with **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEEVER, ABBY JONES, and SASHA SIROTKIN** regarding *PC-SG DTO* shipping labels, online management of the *PC-SG DTO* vendor accounts, and the packaging and shipping of *PC-SG DTO* drug products.

(5) As to **SASHA SIROTKIN** a/k/a “**Sasha Sirota**”, among other things:

- a. provides a facility for the packaging and distribution of drug products by the *PC-SG DTO* in North Hollywood, California; and

- b. provides funds for the purchase of postage used for the distribution of *PC-SG DTO* drug products.
- c. provides funds to **KHLARI SIROTKIN** for the purpose of sustaining the *PC-SG DTO*.

At all times relevant to this Indictment, the following are applicable terms and definitions:

a. The “dark web” is a portion of the Internet, where individuals must use an anonymizing software to access content and websites. Within the dark web, criminal marketplaces operate allowing individuals to buy and sell illegal items, such as drugs, firearms, and other hazardous materials, with greater anonymity than is possible on the traditional Internet.

b. “Vendors” are the dark web’s sellers of goods and services, often of an illicit nature, and they do so through the creation and operation of “vendor accounts” on dark web marketplaces. Customers, meanwhile, operate “customer accounts.” Vendor and customer accounts are not identified by numbers, but rather monikers or “handles,” much like the username one would use on a clear web site.

c. The “Tor network,” or simply “Tor” (an abbreviation for “The Onion Router”), is a special network of computers on the Internet, distributed around the world, designed to conceal the true Internet Protocol (“IP”) addresses of the computers accessing the network, and, thereby, the locations and identities of the network’s users. Tor also enables websites to operate on the network in a way that conceals the true IP addresses of the computer servers hosting the websites, which are referred to as “hidden services” on the Tor network. Such hidden services operating on Tor have complex web addresses, generated by a computer algorithm, ending in “.onion” and can only be accessed through specific web browser software, including a browser known as “Tor Browser,” designed to access the Tor network. Tor is available on cellphones using the Android and Apple operating systems by installing an application that puts a Tor-enabled internet browser

on a user's cellphone, which then routes the phone's IP address through different servers all over the world, making it extremely difficult to track.

d. Cryptocurrency, a type of virtual currency, is a decentralized, peer-to-peer, network-based medium of value or exchange that may be used as a substitute for fiat currency to buy goods or services or exchanged for fiat currency or other cryptocurrencies. Examples of cryptocurrency are Bitcoin, Litecoin, and Ether. Cryptocurrency can exist digitally on the Internet, in an electronic storage device, or in cloud-based servers. Although not usually stored in any physical form, public and private keys (described below) used to transfer cryptocurrency from one person or place to another can be printed or written on a piece of paper or other tangible object. Cryptocurrency can be exchanged directly person to person, through a cryptocurrency exchange, or through other intermediaries. Generally, cryptocurrency is not issued by any government, bank, or company; it is instead generated and controlled through computer software operating on a decentralized peer-to-peer network. Most cryptocurrencies have a "blockchain," which is a distributed public ledger, run by the decentralized network, containing an immutable and historical record of every transaction.<sup>1</sup> Cryptocurrency is not illegal in the United States.

e. Bitcoin<sup>2</sup> ("BTC") is a type of cryptocurrency. Payments or transfers of value made with bitcoin are recorded in the Bitcoin blockchain and thus are not maintained by any single administrator or entity. As mentioned above, individuals can acquire bitcoin through exchanges (i.e., online companies which allow individuals to purchase or sell cryptocurrencies in exchange for fiat currencies or other cryptocurrencies), bitcoin ATMs, or directly from other people.

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<sup>1</sup> Some cryptocurrencies operate on blockchains that are not public and operate in such a way to obfuscate transactions, making it difficult to trace or attribute transactions.

<sup>2</sup> Since Bitcoin is both a cryptocurrency and a protocol, capitalization differs. Accepted practice is to use "Bitcoin" (singular with an uppercase letter B) to label the protocol, software, and community, and "bitcoin" (with a lowercase letter b) to label units of the cryptocurrency. That practice is adopted here.

Individuals can also acquire cryptocurrencies by “mining.” An individual can “mine” bitcoins by using his or her computing power to solve a complicated algorithm and verify and record payments on the blockchain. Individuals are rewarded for this task by receiving newly created units of a cryptocurrency. Individuals can send and receive cryptocurrencies online using many types of electronic devices, including laptop computers and smart phones. Even though the public addresses of those engaging in cryptocurrency transactions are recorded on a blockchain, the identities of the individuals or entities behind the public addresses are not recorded on these public ledgers. If, however, an individual or entity is linked to a public address, it may be possible to determine what transactions were conducted by that individual or entity. Bitcoin transactions are therefore sometimes described as “pseudonymous,” meaning that they are partially anonymous. And while it’s not completely anonymous, bitcoin allows users to transfer funds more anonymously than would be possible through traditional banking and financial systems.

f. Although cryptocurrencies, such as bitcoin, have legitimate uses, cryptocurrency is also used by individuals and organizations for criminal purposes such as money laundering, and is an oft-used means of payment for illegal goods and services on hidden services websites operating on the Tor network. By maintaining multiple wallets, those who use cryptocurrency for illicit purposes can attempt to thwart law enforcement’s efforts to track purchases within the dark web marketplaces. As of October 31, 2019, one bitcoin is worth approximately \$9,160, though the value of bitcoin is generally much more volatile than that of fiat currencies.

g. Cryptocurrency can be stored in digital “wallets.” A wallet essentially stores the access code that allows an individual to conduct cryptocurrency transactions on the public ledger. To conduct transactions on the public ledger, an individual must use a public address (or “public key”) and a private address (or “private key”). The public address can be analogized to a traditional

bank account number, while the private key is like the password or PIN used to access that bank account.

h. Exchangers and users of cryptocurrencies store and transact their cryptocurrency in a number of ways, to include software, hardware, and paper (or physical form) forms. Software wallets can be housed in a variety of forms, including on a tangible, external device (“hardware wallet”), downloaded on a PC or laptop (“desktop wallet”), with an Internet-based cloud storage provider (“online wallet”), as a mobile application on a smartphone or tablet (“mobile wallet”), printed public and private keys (“paper wallet”), and as an online account associated with a cryptocurrency exchange. Because these desktop, mobile, and online wallets are electronic in nature, they are located on mobile devices (e.g., smart phones or tablets) or at websites that users can access via a computer, smart phone, or any device that can search the Internet. Hardware wallets are located on some type of external or removable media device, such as a USB thumb drive or other commercially available device designed to store cryptocurrency (e.g. Trezor, Keepkey, or Nano Ledger). In addition, paper wallets contain an address and a QR code<sup>3</sup> with the public and private key embedded in the code. Paper wallet keys are not stored digitally. Wallets can also be backed up into, for example, paper printouts, USB drives, or CDs, and accessed through a “recovery seed” (random words strung together in a phrase) or a complex password. Additional security safeguards for cryptocurrency wallets can include two-factor authorization (such as a password and a phrase). The investigative team also knows that individuals possessing cryptocurrencies often have safeguards in place to ensure that their cryptocurrencies become further secured in the event that their assets become potentially vulnerable to seizure and/or unauthorized transfer.

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<sup>3</sup> A QR code is a matrix barcode that is a machine-readable optical label.

i. Bitcoin “exchangers” and “exchanges” are individuals or companies that exchange bitcoin for other currencies, including U.S. dollars. According to Department of Treasury, Financial Crimes Enforcement Network (“FinCEN”) Guidance issued on March 18, 2013, virtual currency administrators and exchangers, including an individual exchanger operating as a business, are considered money services businesses.<sup>4</sup> Such exchanges and exchangers are required to register with FinCEN and have proper state licenses (if required under applicable state law). Registered money transmitters are required by law to follow Bank Secrecy Act anti-money laundering (“AML”) regulations, “Know Your Customer” (“KYC”) protocols, and other verification procedures similar to those employed by traditional financial institutions. For example, FinCEN-registered cryptocurrency exchangers often require customers who want to open or maintain accounts on their exchange to provide their name, address, phone number, and the full bank account and routing numbers that the customer links to an exchange account. As a result, there is significant market demand for illicit cryptocurrency-for-fiat currency exchangers, who lack AML or KYC protocols and often also advertise their ability to offer customers stealth and anonymity. These illicit exchangers routinely exchange fiat currency for cryptocurrencies by meeting customers in person or by shipping cash through the mail. Due to the illicit nature of these transactions and their customers’ desire for anonymity, such exchangers are frequently able to charge a higher exchange fee, often as high as 9–10% (in contrast to registered and BSA-compliant exchangers, who may charge fees as low as 1–2%).

j. Some companies offer cryptocurrency wallet services which allow users to download a digital wallet application onto their smart phone or other digital device. A user

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<sup>4</sup> See “Application of FinCEN’s Regulations to Person Administering, Exchanging, or Using Virtual Currencies,” available at <https://www.fincen.gov/resources/statutes-regulations/guidance/application-fincens-regulations-persons-administering>.



typically accesses the wallet application by inputting a user-generated PIN code or password. Users can store, receive, and transfer cryptocurrencies via the application; however, many of these companies do not store or otherwise have access to their users' funds or the private keys that are necessary to access users' wallet applications. Rather, the private keys are stored on the device on which the wallet application is installed (or any digital or physical backup private key that the user creates). As a result, these companies generally cannot assist in seizing or otherwise restraining their users' cryptocurrency. Nevertheless, law enforcement could seize cryptocurrency from the user's wallet directly, such as by accessing the user's smart phone, accessing the wallet application, and transferring the cryptocurrency therein to a law enforcement-controlled wallet. Alternatively, where law enforcement has obtained the recovery seed for a "wallet" (as defined above), law enforcement may be able to use the recovery seed phrase to recover or reconstitute the wallet on a different digital device and subsequently transfer cryptocurrencies held within the new wallet to a law enforcement-controlled wallet.

**COUNT 1**  
**(NARCOTICS CONSPIRACY)**

**A. THE CONSPIRACY**

Beginning on or about October, 2013 and continuing to and until the date of this Indictment, within the Southern District of Ohio and elsewhere, **KHLARI SIROTKIN a/k/a "Khlari Sirota," "Khlari Eleazor Isbell SIROTKIN," "Klizo," "Sirota," "Kliz," "Killa B," "Slanggang," and "@SlangGangRick;"** **KELLY STEPHENS a/k/a "Kelly E Stephens," "Kelly Shea," "Kelly Comatose," "Killa Kells," "Kel," "Slanggang," "@SlangGangRick," and "oxxymoron;"** **SEAN DEEVER a/k/a "Sean Deavers," "Sean Patrick Deaver," "Fatz," "Fats," "Phatz," "Interstatefatz," "PillCosby," and "Pill-Cosby;"** **ABBY JONES a/k/a "PillCosby," "Pill-Cosby," and "Abby Phatz;"** and **SASHA SIROTKIN a/k/a "Sasha Sirota,"**

the defendants herein, and others, did knowingly, willfully, intentionally, and unlawfully combine, conspire, confederate, and agree, and have a tacit understanding with each other, to commit offenses against the United States, to wit: to knowingly, willfully, intentionally and unlawfully possess with intent to distribute and to distribute four hundred (400) grams or more of mixtures or substances containing detectable amounts of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (hereinafter “fentanyl” at all times in this Indictment), a Schedule II Controlled Substance, to possess with intent to distribute and to distribute one hundred (100) grams or more of mixtures or substances containing detectable amounts of Heroin, a Schedule I Controlled Substance, to possess with intent to distribute and to distribute fifty (50) grams or more of mixtures or substances containing detectable amounts of Methamphetamine, a Schedule II Controlled Substance, and to possess with intent to distribute and to distribute five hundred (500) grams or more of mixtures or substances containing detectable amounts of Cocaine, a Schedule II Controlled Substance, all in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), (b)(1)(B) and (b)(1)(C).

**B. GOALS OF THE CONSPIRACY**

The *PC-SG* conspiracy functioned as a DTO. It was a goal of the conspiracy that, in order to obtain as much money and other things of value as possible, certain of the defendants and co-conspirators acquired fentanyl, heroin, and other illegal drugs, for the purpose of distribution throughout the United States, including to the Southern District of Ohio.

It was also a goal of the conspiracy that, in order to obtain money and other things of value for themselves, certain of the defendants and co-conspirators provided storage for, and thus aided in the manufacture and distribution of fentanyl mixtures, heroin mixtures, cocaine mixtures, methamphetamine mixtures and other illegal drugs; stored illicit proceeds gained from sales of such mixtures and other drugs; and engaged in financial transactions involving virtual currencies,

which had the effect of promoting, and did promote, the drug trafficking activities in this Indictment, in the Southern District of Ohio and elsewhere.

It was a goal of the conspiracy that, in order to obtain as much money and other things of value as possible, certain of the defendants and co-conspirators distributed those illegal drugs to, among other places, the Southern District of Ohio.

**C. WAYS, MANNER, AND MEANS TO ACCOMPLISH THE CONSPIRACY**

The ways, manner and means by which the co-conspirators operated their illegal drug trafficking organization, include, *but are not limited to* the following:

It was part of the conspiracy that certain defendants would, and did, play different roles in the conspiracy, perform different tasks and participate in the conduct of the organization through various criminal acts. The defendants made themselves and their services available at various times throughout the life of the conspiracy and participated in certain drug trafficking ventures as required to promote and protect the illegal drug distribution operation. The roles assumed by some defendants were interchangeable at various times throughout the conspiracy. Some of the roles assumed and carried out by the defendants included, among others, leader, supplier of drugs, packager, holder, intermediary, helper, stash house operator, facilitator, launderer of drug proceeds, and transporter/courier.

It was further part of the conspiracy that the defendants and co-conspirators used computers, cellular telephones, other electronic devices, and also motor vehicles to facilitate their illegal drug business.

It was further part of the conspiracy that fentanyl, heroin, cocaine, methamphetamine and other illegal drugs were obtained by the co-conspirators and advertised for sale on dark web

marketplaces through vendor accounts and other social media methods established by the co-conspirators for the sole purpose of facilitating their illegal drug business.

It was further part of the conspiracy that the co-conspirators transacted sales of their illegal narcotics using cryptocurrency (Bitcoin), and as necessary converted as much of that currency to fiat currency needed to maintain their lifestyles and to obtain goods and services, while the rest has been kept stored in digital wallets.

It was further part of the conspiracy that beginning in approximately October 2013, **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEAVER, ABBY JONES, and SASHA SIROTKIN** conspired together to operate the *PC-SG DTO*, which is an online poly-drug trafficking organization responsible for the manufacturing and distribution of controlled substances to individuals throughout the United States. During this span, **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEAVER, ABBY JONES, and SASHA SIROTKIN** (operating as the *PC-SG DTO*) based their operations from Las Vegas (Nevada), Los Angeles (California), Durango (Colorado), and Denver (Colorado). This multi-city-based DTO operated online via various dark web marketplaces and a Wickr chat room. The two marketplace vendor accounts operated were *PillCosby*<sup>5</sup> and *Slanggang*, while the Wickr chat room operated was *Slanggangcentral*.<sup>6</sup>

It was further part of the conspiracy that **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEAVER, ABBY JONES, and SASHA SIROTKIN** conspired to distribute fentanyl, methamphetamine, heroin, and cocaine, among many other types of controlled substances, by

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<sup>5</sup> Slightly different versions of this name were used, such as, "*PillCosby*" and "*Pill-Cosby*."

<sup>6</sup> Wickr is explained in more detail herein.

advertising for sale their products on the Dream, Wall Street, Silk Road 3.1, Nightmare, and Empire dark web marketplaces and from Wickr to customers all over the United States.

It was further part of the conspiracy that the *PC-SG DTO* advertised, manufactured, and distributed counterfeit drugs while intentionally mislabeling pills as oxycodone when they contained fentanyl. **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEEVER, ABBY JONES, and SASHA SIROTKIN** communicated with one another about packaging the drugs, ordering and purchasing shipping labels for drug packages, shipments of the drugs, responding to customer service issues for the organization, obfuscating cryptocurrency for the purpose of evading law enforcement detection, and transacting with various cryptocurrency, among many other duties.

It was further part of the conspiracy that **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEEVER, ABBY JONES, and SASHA SIROTKIN** work in concert with one another to operate both dark web vendor accounts, *PillCosby* and *Slanggang*, and *Slanggangcentral* Wickr room. Though the *PC-SG DTO* operates numerous online retail sites, **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEEVER, ABBY JONES, and SASHA SIROTKIN** are one-in-the-same organization, distributing the same drug product, displaying similar pricing model, sharing shipping resources, comingling their ill-gotten proceeds from cryptocurrencies, sharing account access, and converting their criminal proceeds in cryptocurrencies into United States Currency.

It was further part of the conspiracy that **KHLARI SIROTKIN, KELLY STEPHENS, SEAN DEEVER, ABBY JONES, and SASHA SIROTKIN** (as the *PC-SG DTO*) specialized in the manufacturing and distribution of pressed oxy[codone] pills, which proved to contain

detectable amounts of fentanyl. The *PC-SG DTO* advertised and distributed 30 milligram (mg) pressed oxy[codone] (A215) tablets<sup>7</sup> and M 30 oxy[codone] tablets, both containing fentanyl.

#### **D. OVERT ACTS**

In furtherance of the conspiracy and in order to accomplish its objectives, the defendants, **KHLARI SIROTKIN** aka “**Khlari Sirota**,” “**Khlari Eleazor Isbell SIROTKIN**,” “**Klizo**,” “**Sirota**,” “**Kliz**,” “**Killa B**,” “**Slanggang**,” and “**@SlangGangRick**,” **KELLY STEPHENS** aka “**Kelly E Stephens**,” “**Kelly Shea**,” “**Kelly Comatose**,” “**Killa Kells**,” “**Kel**,” “**Slanggang**,” “**@SlangGangRick**” and “**oxxxymoron**,” **SEAN DEAVER** aka “**Sean Deavers**,” “**Sean Patrick Deaver**,” “**Fatz**,” “**Fats**,” “**Phatz**,” “**Interstatefatz**,” “**PillCosby**,” and “**Pill-Cosby**,” **ABBY JONES** aka “**PillCosby**,” “**Pill-Cosby**,” and “**Abby Phatz**,” and **SASHA SIROTKIN** aka “**Sasha Sirota**” committed acts and engaged in conduct which facilitated the objectives of the conspiracy, *including but not limited to the following*:

##### Establishment of Cryptocurrency Accounts

Members of the *PC-SG DTO* established accounts at various cryptocurrency exchanges located in the United States and elsewhere to aid in their concealment of criminal proceeds and to conduct drug transactions using cryptocurrency. **SASHA SIROTKIN** was the first of the defendants to establish a Coinbase account in October 2013 followed thereafter by **KHLARI SIROTKIN**, **ABBY JONES**, and **SEAN DEAVER**. The defendants used their Coinbase accounts, along with other accounts at similar institutions, to convert criminal proceeds into United States Currency or into various forms of cryptocurrency. Further, the defendants used these financial exchanges to co-mingle criminal proceeds derived from distributing drugs online.

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<sup>7</sup> According to the Hamilton County Ohio Laboratory, the approximate average weight of one of PC-SG DTO’s A 215 pressed oxycodone (established to be fentanyl) tablet equals approximately 0.109 grams.

Establishment of the *Pill-Cosby* and *Slanggang* Dream Marketplace Accounts

Dream Market was a dark web market in operation from approximately November 2013 continuing through approximately April 2019. In approximately October 2019, Dream had approximately 152,596 listings for illegal items, such as drugs, fraud, counterfeit items, and software and malware. Prospective vendors had to register with Dream and pay a fee to advertise their illicit goods. In April 2019, the administrators of Dream shut down the marketplace.

According to the Dream website, the moniker, “*Pill-Cosby*” registered as a vendor on August 9, 2017. *Pill-Cosby* listed the following illegal drugs on their “listings” page: 30mg Oxy[codone] (A215) for \$13.00 per pill, 25X [25 pills] Pressed Oxy[codone] (A215) for \$250.00, 50X [50 pills] Pressed Oxy[codone] 30mg (A215) for \$450.00, 100X [100 pills] Pressed Oxy[codone] (A215) for \$800, 1000X (1000 pills) Pressed Oxy[codone] (A215) for \$7,000.00, 50 30mg Oxy[codone] for \$31.50 each, 100 30mg Oxy[codone] for \$30 each. As of March 30, 2019, *Pill-Cosby* had 5,400 confirmed marketplace transactions with a 4.86/5.00 vendor profile rating. *Pill-Cosby* stated in their terms and conditions a minimum order constituted at least five (5) pills.

According to the Dream website, the moniker, “*Slanggang*” registered as a vendor on December 6, 2018. *Slanggang* had similar drug listings as *Pill-Cosby* had on Dream. As of June 2, 2019, *Slanggang* had 1,150 confirmed marketplace transactions with a 4.87/5.00 vendor profile rating. *Slanggang* stated in their terms and conditions a minimum order constituted at least ten (10) pills.

Establishment of the *Pill-Cosby* and *Slanggang* Empire Marketplace Accounts

The Empire marketplace has been in operation since early 2018. Empire is one of the current largest marketplaces in operation. In approximately October 2019, Empire had approximately 57,000 listings for illegal items, such as drugs, fraud, counterfeit items, and

software and malware. Prospective vendors had to register with Empire and pay a fee to advertise their illicit goods.

According to the Empire website, the moniker, “*Pill-Cosby*” registered as a vendor on April 22, 2019. *Pill-Cosby* listed the following illegal drugs on their “listings” page: 30mg Oxy[codone] (A215), 500+ [500 pills] (A215), Top Shelf Crystal Meth. As of October 8, 2019, *Pill-Cosby* had 684 confirmed marketplace transactions with a 99.84% positive feedback rating. *Pill-Cosby* stated in their terms and conditions a minimum order constituted at least five (5) pills regarding listing #1 (660 transactions). Listing #2 required a minimum order of 500 pills (20 transactions).

According to the Empire website, the moniker, “*Slanggang*” registered as a vendor on June 23, 2019. *Slanggang* listed the following illegal drugs on their “listings” page: 30mg Oxy[codone] for \$13 per pill, 11X [11 pills] for \$11.50 per pill, 500X [500 pills] for \$9 per pill. As of October 8, 2019, *Slanggang* had 1,053 confirmed marketplace transactions with a 99.45% positive feedback rating. *Slanggang* stated in their terms and conditions a minimum order constituted at least ten (10) pills.

#### Establishment of *Slanggangcentral* Wickr Room

Wickr is a well-known mobile instant messenger application that employs encrypted technology and content messages, including photos, videos, and file attachments, that expire after a pre-set time. In April 2019, *Slanggang* posted on their Empire “About” page, an alternate form of contact, “Wickr: @slanggangrick.” In approximately April 2019, an undercover employee (“UCE”) contacted @slanggangrick via Wickr. Following the contact, @slanggangrick added the UCE to the *Slanggangcentral* Wickr room. Additionally, @slanggangrick also provided another Wickr handle for communication, slanggang@protonmail.com.



A Wickr room is a feature within the Wickr platform that enables large groups of users to communicate with one another led by an administrator. In this instance, @slanggangrick created a Wickr room as an administrator; as such, @slanggangrick had leadership and control of user access to the room. Since May 2019, there have been at a minimum, 85 different Wickr customers participating in *Slanggangcentral* Wickr room for the purpose of purchasing and selling drugs from the *PC-SG DTO*. The *PC-SG DTO* established drug prices, terms of sale, shipping methods, discussion topics, and all forms of negotiations within the room. @slanggangrick posted wallet addresses routinely for customers to send cryptocurrency to in order to conduct a drug transactions. @slanggangrick polices the room and admonishes users for violating rules. @slanggangrick will remove users from the room if they violate the rules. For example, @slanggangrick forbids soliciting and for no more than five (5) posts per day per user. @slanggangrick will make posts in the Wickr room reinforcing customer requirements for ordering fentanyl pills. For example, on October 1, 2019, @slanggangrick stated they transact 30-50 orders daily between Empire and Wickr. Further, @slanggangrick stated there is a 10-pill minimum per order, as indicated below. Thus, @slanggangrick sold approximately 33,900 grams (33.9 kilos) of fentanyl between May 1, 2019 to September 30, 2019, which was calculated by multiplying a 10-pill minimum order by 30 orders daily minus weekends.

slanggangrick



hey folks last call for orders for today

2:19 pm (40) ✓

Announcement: the new min order is 10 pills. I know most all of you order larger then that but some times theres a few under and between empire and here im doing like 30-50 a day some times and so I need them to stay above a at least 10 to make it worth while an not bog down larger orders with micro orders like crazy. this is mostly a Empire issue but the rule applies here now as well

2:23 pm (40) ✓

Counterfeit Drugs Sold by PC-SG DTO

The *PC-SG DTO* manufactures and distributes “30mg pressed oxy[codone] (A 215) tablets and M 30 oxy[codone] tablets, which contain fentanyl. The *PC-SG DTO*’s “A 215” and “M 30” tablets have been found to be counterfeit and misbranded. A tablet imprint of “A 215” and “M 30” are associated with a 30 mg oxycodone HCL tablet sold by Actavis and Mallinckrodt Pharmaceuticals, respectively, and that oxycodone HCL is a Schedule II controlled substance.

October 2017 Creation of an iOS WhatsApp Group Instant Message Group

An iOS WhatsApp group message was created on or about October 27, 2017, and operated until on or about October 24, 2018, with 264 shared messages. The assigned users in this group were **KELLY STEPHENS** using (702) 349-7049, **ABBY JONES** using (702) 701-2532, **SEAN DEEVER** using (702) 960-6359, and **KHLARI SIROTKIN** using (702) 901-1148. During this group chat, **ABBY JONES** told **KHLARI SIROTKIN** that the “store” (dark web marketplace vendor account) was “set up.”

January 2018 Creation of an iOS WhatsApp Group Instant Message Group

An iOS WhatsApp group message was created on or about January 10, 2018, and operated until, on or about June 30, 2018, with 381 shared messages. The assigned users in this group were, **KELLY STEPHENS** using (702) 349-7049 and **ABBY JONES** using (702) 701-2532. During this group chat, **KELLY STEPHENS** told **ABBY JONES** that she is doing the “list,” referring to the online customer orders for drugs. **KELLY STEPHENS** followed by stating she was taking over the “orders” from **KHLARI SIROTKIN**. **ABBY JONES** stated she is waiting to do the “labels,” referring to shipping labels for the drug packages, until they receive the “inventory,” referring to drugs. **KELLY STEPHENS** further stated **KHLARI SIROTKIN** put money on her card and she intended to provide it to “Phatz,” referring to **SEAN DEEVER**. **ABBY JONES**

replied to contact **SEAN DEEVER** at (702) 960-6359, but that **SEAN DEEVER** “likes to talk on what’s app or in code.”

January 2018 Creation of the “Mofuckas” WhatsApp iOS Instant Messaging Group

An iOS WhatsApp group message was created on or about January 13, 2018, and operated until on or about April 3, 2018, with 36 shared messages, with the name of “Mofuckas.” The assigned users in this group were **KELLY STEPHENS** using (702) 349-7049, **ABBY JONES** using (702) 701-2532, and **SEAN DEEVER** using (702) 960-6359. During the session, **KELLY STEPHENS** stated she sent the “list,” referring to the online dark web marketplace customer ordering list. **SEAN DEEVER** in response stated, “All good...there is no product,” referring to drugs, and the orders will not be able to filled until Monday. **ABBY JONES** texted, “So we just need the quantity of the 30’s [Oxycodone 30mg] for those lists.” **SEAN DEEVER** later texted, “I’m pretty sure, so add the quantities ASAP on the oxy 30’s... for instance, if someone orders 50 oxy 30’s the list should say 50 R’s (R for Roxxy) if they order 50 M 30’s (which are more expensive) the list should say 50 M’s.

February 2018 Creation of an iOS WhatsApp Group Instant Message Group

An iOS WhatsApp group message was created on or about February 7, 2018, and operated until on or about October 12, 2018, with 2,226 shared messages. The assigned users in this group were **KELLY STEPHENS** using (702) 349-7049 and **KHLARI SIROTKIN** using (702) 569-9982. During the session, **KELLY STEPHENS** asked if another “account” could be established, referring to another dark web vendor account. **KELLY STEPHENS** later stated that “we” should use the “PC” account, which referred to the Pill-Cosby account. **KHLARI SIROTKIN** shared **SEAN DEEVER**’s Wells Fargo account, checking account number ending in 6941, for **KELLY STEPHENS** to send money to, in which **KELLY STEPHENS** stated she deposited “it.” Several

months later, in June 2018, **KHLARI SIROTKIN** told **KELLY STEPHENS** that the “only active ingredient is the fent[any].” **KELLY STEPHENS** later replied, “Why? I thought it doesn’t matter about the cops?” “They cant’s see my texts.”

February 2018 Creation of the “Mofuckas” WhatsApp iOS Instant Messaging Group

An iOS WhatsApp group message was created on or about February 9, 2018, and operated until on or about May 1, 2018, with 340 shared messages, with the name of “Mofuckas.” The assigned users in this group were **KELLY STEPHENS** using (702) 349-7049, **ABBY JONES** using (702) 701-2532, **SEAN DEAVER** using (702) 960-6359, and **KHLARI SIROTKIN** using (702) 569-9982. During the session, **KHLARI SIROTKIN** told the group “stamps” are finished, which referred to the shipping labels for the drug packages. **KHLARI SIROTKIN** later told the group that the “mixing” of “coins” is complete, which referred to the obfuscation of their cryptocurrencies. All four members of the chat discuss customer orders. For example, on March 1, 2018, **SEAN DEAVER** shared a customer order, “2 caps 10 caps Josh D. XXX xxxxxx Freemansburg, PA 1801.”

August 2018 Creation of an iOS WhatsApp Group Instant Message Group

An iOS iMessage chat was created on or about August 18, 2018, and operated until on or about August 23, 2019, with 5,755 shared messages. The assigned users in this group were **KHLARI SIROTKIN** using (310) 493-0342 and **SASHA SIROTKIN** using sashasirota@icloud.com. During the session, **KHLARI SIROTKIN** asked **SASHA SIROTKIN** for more money because he had “so many orders” and he is unable to “ship” them referring to customer orders for drugs from the PC-SG DTO online accounts. **KHLARI SIROTKIN** asked **SASHA SIROTKIN** to pay him via PayPal.

April 2019 Creation of an iOS WhatsApp Group Instant Message Group

An iOS WhatsApp group message was created on or about April 23, 2019, and operated until on or about July 25, 2019, with 3,997 shared messages. The assigned users in this group were, **KELLY STEPHENS** using (702) 349-7049 and **KHLARI SIROTKIN** using (310) 493-0342. During the session, **KHLARI SIROTKIN** and **KELLY STEPHENS** discuss fulfilling drug orders for customers. **KHLARI SIROTKIN** stated that “we’ll” go over to “Nightmare” and get the ones that are on there real quick and then we’ll go over to Empire,” which refers to the Nightmare and Empire dark web markets while “ones” refer to customer orders. **KHLARI SIROTKIN** stated on June 12, 2019, that he is making \$20,000 monthly and that he has “8k 30’s = \$80,000,” which refers to 8,000 30 mg tablets of fentanyl. In this same message **KHLARI SIROTKIN** further stated, “I got another brick that’ll make me another \$300,000 + that doesn’t even include my grow.” In this instance, a “brick” refers to a kilogram while the “grow” refers to **KHLARI SIROTKIN**’s recent purchase of a marijuana farm in Pueblo, Colorado. On June 17, 2019, **KELLY STEPHENS** asked **KHLARI SIROTKIN** which email to use for logging in to the site. **KHLARI SIROTKIN** replied, [slanggang@protonmail.com](mailto:slanggang@protonmail.com), which is the same email used on *slanggangcentral* and by investigators to conduct undercover drug transactions with *Slanggang*. On June 18, 2019, **KHLARI SIROTKIN** stated, “I’m supposed to pay 25k to fatz,” which is an alias for **SEAN DEAVER**.

The Use of Amazon.com

The *PC-SG DTO* used Amazon.com to purchase drug paraphernalia and components for their clandestine laboratory used in the manufacturing and distribution of counterfeit drugs containing fentanyl. For example, in October 2017, an Amazon account associated with [rossymommy@yahoo.com](mailto:rossymommy@yahoo.com), an email account used by **SEAN DEAVER** and **ABBY JONES**,

was used to purchase numerous items associated with counterfeit drug manufacturing, packaging, and distribution, such as shipping labels, 2-way humidity control, and heat-sealing machine. These items were sent to “Abby Jones, 6774 Trammel Ct., Las Vegas, NV,” an address associated with **SEAN DEAVER** and **ABBY JONES**. The payment method used for these items was **KHLARI SIROTKIN**’s credit card ending in 0763. As another example, November 2018, an Amazon account associated with djcadzow@gmail.com, an email account associated with Demetra Isbell, **KHLARI SIROTKIN**’s mother was used to purchase numerous items associated with counterfeit drug manufacturing, packaging, distribution, and the concealment of cryptocurrency. A ledger cryptocurrency hard wallet was purchased and shipped to “Kelly Stephens, 200 Hoover Ave., Unit 1207, Las Vegas, NV,” which was an address associated with **KELLY STEPHENS** and **KHLARI SIROTKIN**. The payment method for this purchase was **KHLARI SIROTKIN**’s credit card ending in 0763. Additionally, in June and August of 2019, an Amazon account associated with KLIZOSIROTA@GMAIL.COM, which was an email account used by **KHLARI SIROTKIN**, was used to purchase numerous items associated with counterfeit drug manufacturing, packaging, and distribution. Approximately 500 mylar bags of varying sizes, 200 self-sealing bubble mailers, 1,200 printable shipping labels, and approximately 4.5 lbs of lactose monohydrate, an ingredient commonly used as a filler in the manufacture of tablets, were purchased and shipped to “Khlari Sirotkin, 5756 Craner Ave North Hollywood, CA”, which is an address associated with **SASHA SIROTKIN** and **KHLARI SIROTKIN**. The payment method for this purchase was **KHLARI SIROTKIN**’s credit cards ending in 9820 and 2562.

#### The Use of PayPal

The *PC-SG DTO* used PayPal to purchase drug paraphernalia and components for their clandestine laboratory, conceal proceeds derived from drug trafficking, and to fund the operation

of the DTO. For example, between January and May 2017, **KHLARI SIROTKIN** used his PayPal account ending in 4715 to purchase a 6mm Stamp Die Mold Die Punching for Tablet Press Machine, A215 Stamp Die Mold Die Punching for tablet Press Machine, and Handheld Manual Tablet Press Pill Maker from eBay, MeerKite Inc., and 义乌市宸季电子商务商行, respectively.

Further, two deposits for \$165.00 and \$1,000.00 on April 14, 2019 and April 16, 2019 were sent from **SASHA SIROTKIN**'s PayPal account to **KHLARI SIROTKIN**'s PayPal account for the purpose of day-to-day operations of the *PC-SG DTO*.

Controlled Purchases of Narcotics from the *PC-SG DTO*

On or about April 30, 2018, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 3 grams of heroin to an FBI Undercover Employee (UCE) in exchange for 0.02357 BTC (\$219.70), which was delivered to the Southern District of Ohio.

On or about June 29, 2018, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 50 pressed fentanyl tablets to an FBI UCE in exchange for 0.071 BTC (\$446.00), which was delivered to the Southern District of Ohio.

On or about September 22, 2018, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 3 grams of heroin to an FBI UCE in exchange for 0.0342 BTC (\$219.70), which was delivered to the Southern District of Ohio.

On or about October 6, 2018, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 3 grams of heroin to an FBI UCE in exchange for 0.0508 BTC (\$328.90), which was delivered to the Southern District of Ohio.

On or about October 26, 2018, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 3 grams of heroin to an FBI UCE in exchange for 0.03419 BTC (\$219.70), which was delivered to the Southern District of Ohio.

On or about November 13, 2018, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 25 pressed fentanyl tablets to an FBI UCE in exchange for 0.0451 BTC (\$290.00), which was delivered to the Southern District of Ohio.

On or about November 20, 2018, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 15 pressed fentanyl tablets to an FBI UCE in exchange for 0.0335 BTC (\$210.80), which was delivered to the Southern District of Ohio.

On or about December 11, 2018, *PC-SG DTO*, using the *Slanggang* vendor account on Dream dark web marketplace, provided at least 15 pressed fentanyl tablets to an FDA UCE in exchange for 0.0596000 (\$233.00), which was delivered to the Southern District of Illinois.

On or about April 13, 2019, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Wall Street dark web marketplace, provided at least 50 pressed fentanyl tablets to an FDA UCE in exchange for 0.10138728 (\$530.00), which was delivered to the Southern District of Illinois.

On or about May 10, 2019, *PC-SG DTO*, using the *Pill-Cosby* vendor account on Dream dark web marketplace, provided at least 37 grams of methamphetamine and 10 pressed fentanyl tablets to an FBI UCE in exchange for 0.1817 (\$955), which was delivered to the Southern District of Ohio.

On or about May 23, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 50 pressed fentanyl tablets to an FBI UCE in exchange for 0.13300 BTC (\$780), which was delivered to the Southern District of Ohio.

On or about June 27, 2019, *PC-SG DTO*, using the *Slanggang* vendor account on Empire, provided at least 103 pressed fentanyl tablets to an FDA UCE in exchange for 0.11251560 bitcoin (\$1,250.00), which was delivered to the Southern District of Ohio.



On or about July 1, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least five (5) grams of cocaine to an FBI UCE in exchange for 0.03375 BTC (\$430), which was delivered to the Southern District of Ohio.

On or about July 25, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 50 pressed fentanyl tablets to an FDA UCE in exchange for 0.01659500 (\$635.00), which was delivered to the Southern District of Ohio.

On or about July 25, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 50 pressed fentanyl tablets to an FBI UCE in exchange for 0.05905500 BTC (\$635.00), which was delivered to the District of Kansas.

On or about July 30, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 50 pressed fentanyl tablets to an FBI UCE in exchange for 0.07285 BTC (\$730), which was delivered to the Southern District of Ohio.

On or about August 8, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 50 pressed fentanyl tablets to an FDA UCE in exchange for 0.02236000 (\$260.00), which was delivered to the Southern District of Ohio.

On or about August 8, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 20 pressed fentanyl tablets to an FDA UCE in exchange for 0.02184000 (\$260.00), which was delivered to the District of Kansas.

On or about August 21, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 20 pressed fentanyl tablets to an FDA UCE in exchange for 0.01636836 (\$170.00), which was delivered to the District of Kansas.

On or about August 29, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and slanggang@protonmail.com account, provided at least 21 pressed fentanyl tablets to an FDA UCE

in exchange for 0.02009 (\$205.00). Investigators located in the Central District of California seized the parcel bearing the name and address of an FDA UCE, following the surveillance **KHLARI SIROTKIN** shipping the parcel, of which was destined for the Southern District of Ohio.

On or about September 10, 2019, *PC-SG DTO*, using the *Slanggangcentral* Wickr room and *slanggang@protonmail.com* account, provided at least 18 pressed fentanyl tablets to an FDA UCE in exchange for 0.02548 (\$260.00), which was delivered to the Southern District of Ohio.

On or about September 10, 2019, a package was seized that was sent from Denver, Colorado to “SAMUEL Q. XXX xxxxxx DAYTON OH 45409-2619” (Southern District of Ohio) by **KHLARI SIROTKIN**. The package contained one (1) vacuum-sealed bag containing eleven (11) blue, round pills, each containing the imprint “A 215.”

On or about September 20, 2019, a package was seized that was sent from Denver, Colorado to “CY F. XXX xxxxxx CADDO TX 76429-8000” by **KELLY STEPHENS**. The package contained one (1) clear-plastic, vacuum-sealed bag and 23 round, blue pills with the imprint, “A 215.”

On or about October 3, 2019, a packaged was seized that was sent from Denver, Colorado, to “LORRIANE R. XXX xxxxxx WINONA MS 38967-1916” by **KHLARI SIROTKIN**. The package contained one (1) clear plastic FoodSavor vacuum/heat sealed bag containing round blue pills, with the imprint, “A 215.” The total drug package weight was 70.9 grams.

*Slanggang's* Pretty Good Privacy (PGP) Public Key

Pretty Good Privacy (PGP) encryption is an asymmetric encryption method that utilizes a pair of public and private keys. In PGP encryption, the public key is used to encrypt messages, which can only be decrypted using the corresponding private key and a password. In this encryption method, key owners make the public key available to anyone they wish to be able to

encrypt messages, which can only be decrypted using the private key and password. Owners of PGP keys generally keep their private keys and passwords secure because these are the only two pieces of information required to decrypt messages, which have been encrypted with the corresponding public key. PGP encryption to be widely used by individuals involved in the trafficking of drugs on dark web marketplaces in exchange for cryptocurrency.

On or about July 17, 2018, cryptoklizo@gmail.com, an email account used by **KHLARI SIROTKIN**, sent an email to kellycomatose@gmail.com, an email account used by **KELLY STEHPENS**, containing a single attachment bearing filename “SlangGang (0814031C) – Secret.ASC.” The file contained a PGP public and private encryption key pair. A hash value analysis was conducted comparing this public PGP key in “SlangGang (0814031C)” against the public PGP key for *Slanggang’s* Dream profile page on the Dream marketplace, which revealed an exact match.

#### Drug and Financial Ledgers

Numerous ledgers have been identified from **SEAN DEEVER** and **KHLARI SIROTKIN’s** accounts, which quantified the *PC-SG DTO* drug production capabilities and the financial profit derived from such activity.

**SEAN DEAVER's** Gmail account contained a drug ledger, as indicated below:

From Interstatefatz702 <interstatefatz@gmail.com> ☆	Feb 11 - Feb 22
Subject <b>Jan 23 - Feb 8</b>	Total : \$15,295
Jan 23 - Feb 8	Prod : \$6,465
Total : \$18,930	Paid : \$4,520
Prod : \$8,755	C: total- \$5,065
Paid : \$8,133	prod- \$1,985
C: total- \$4,160	profit- \$3,080
prod- \$1,692	B: total- \$10,230
profit- \$2,468	prod- \$4,475
B: total- \$7,640	profit- \$5,755
prod- \$3,483	(Not including Xan profits)
profit- \$4,157	Jan 23 - Feb 22
30: total- \$7,130	Total Sales: \$34,225
prod- \$3,580	Prod Cost: \$15,772
profit- \$3,580 (not including \$5 for M)	Total Sent (via BitPay): \$12,653
	Total Profit: \$21,572

As indicated in the image, **SEAN DEAVER** used code language, such as “C” to describe crystal methamphetamine, “B” for black tar heroin, “30” to describe 30mg pressed oxy[codone], and “Xan” for Xanax<sup>8</sup>. This ledger indicates the amount of production cost and the profit **SEAN DEAVER** has made from operating his portion of the *PC-SG DTO*.

Contained in **KHLARI SIROTKIN's** Apple Account:

**KHLARI SIROTKIN** participated in an SMS iMessage chat with **KELLY STEPHENS**.

**KHLARI SIROTKIN** described the financial ledger of the *PC-SG DTO*, as represented below:

6/12/2019	18:13:06	Kliz (+13104930342) [ <b>KHLARI SIROTKIN</b> ]	But for real I'm All ready pulling down 20k a month + I already have 8k 30's [30 mg pressed fentanyl pills] = \$80,000 And I just got another brick [kilogram] that'll make me another \$300,000 + and that doesn't even include my grow [marijuana farm that
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<sup>8</sup> Xanax, or the generic form, alprazolam, is a benzodiazepine, which is a Scheduled IV Controlled Substance.

			<b>KHLARI SIROTKIN</b> purchased in Pueblo, CO]
6/16/2019	19:07:44	Kliz (+13104930342) [ <b>KHLARI SIROTKIN</b> ]	We gonna be so loaded!! Adam says the big ones [marijuana plant] will be 3lb ers and the smallest ones 2lb My cut is %20 of 3600 = 720 x 2.5 = 1800 x \$10000 = \$1.8million !!!!
6/17/2019	21:47:13	Local User [ <b>STEPHENS</b> ]	You're out of white? [Cocaine]
6/17/2019	21:47:17	Local User [ <b>STEPHENS</b> ]	New order for ½ g [Gram]
6/17/2019	21:47:42	Kliz (+13104930342) [ <b>KHLARI SIROTKIN</b> ]	Yeah don't add that to our shipping
6/17/2019	21:47:52	Kliz (+13104930342) [ <b>KHLARI SIROTKIN</b> ]	I just forward those orders to Jon now
6/18/2019	00:54:23	Kliz (+13104930342) [ <b>KHLARI SIROTKIN</b> ]	Possibly If u need me to Otherwise tomorrow or the next will be better I'm supposed to pay 25k to fatz [ <b>SEAN DEAVER</b> ] today and I'm really close so possibly I could do both
6/21/2019	02:50:16	Kliz (+13104930342) [ <b>KHLARI SIROTKIN</b> ]	Just Do the math if you get scared. The brick [kilogram] I just bought is going to make me a 30,000 pills [fentanyl pills] I still have 5000 from before

Fentanyl pill production recipe contained in **KHLARI SIROTKIN**'s Apple Notes:

◆ 1k Pill mix:

17.5 active

5 blue

70.5 white

8 Lactose

Total 101g

As indicated in the image, **KHLARI SIROTKIN** preserved the *PC-SG DTO* recipe for the manufacturing of pressed fentanyl pills. **KHLARI SIROTKIN** stated 17.5 grams of fentanyl were used to manufacture 1000 fentanyl pills ("PC-SG DTO's "1000x pressed oxy[codone]").

April 16, 2017 Photograph of a PC-SG DTO Pill Press Operation

KELLY STEPHENS' Google account contained the below photograph bearing file name "IMG\_296.JPG," revealing a manner in which the PC-SG DTO manufactures pressed tablets.



The photograph's metadata revealed it was taken with an iPhone 7, on April 16, 2017, and contained GPS metadata, which indicated that the photo was taken in the area of, 2735 W Pebble Rd., Unit 313, Las Vegas, NV 89123-6567, an address associated with **KHLARI SIROTKIN**.

In violation of Title 21 United States Code, Section 846

**COUNT 2**

**(DISTRIBUTION AND ATTEMPTED DISTRIBUTION OF HEROIN)**

On or about April 30, 2018, in the Southern District of Ohio and elsewhere, defendants **KHLARI SIROTKIN** aka "Khlari Sirota," "Khlari Eleazor Isbell SIROTKIN," "Klizo," "Sirota," "Kliz," "Killa B," "Slanggang," and "@SlangGangRick;" **KELLY STEPHENS** aka "Kelly E Stephens," "Kelly Shea," "Kelly Comatose," "Killa Kells," "Kel," "Slanggang," "@SlangGangRick" and "oxxymoron;" **SEAN DEAVER** aka "Sean Deavers," "Sean Patrick Deaver," "Fatz," "Fats," "Phatz," "Interstatefatz," "PillCosby," and "Pill-Cosby;" **ABBY JONES** aka "PillCosby," "Pill-Cosby," and "Abby Phatz;" and **SASHA SIROTKIN**