

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

JOSEPH JAMES VASQUEZ, and

JOSHUA WILLIAM VASQUEZ,  
a/k/a “Fredrico Sanchez,”  
a/k/a “Luis Santos,”

and

RAFAEL ANTONIO ROMAN,

*Defendants.*

**UNDER SEAL**

Case No. 1:24-MJ-45

**AFFIDAVIT IN SUPPORT OF**  
**A CRIMINAL COMPLAINT AND ARREST WARRANTS**

I, Daniel McCoy, being duly sworn, depose and state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. This affidavit is submitted in support of a criminal complaint and arrest warrants charging that, from at least in or around June 2023 and continuing through the present, within the Eastern District of Virginia and elsewhere, the defendants, JOSEPH VASQUEZ, JOSHUA VASQUEZ, and RAFAEL ROMAN, did knowingly and intentionally combine, conspire, confederate, and agree with each other and others, known and unknown, to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 846.

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have

been so employed since January 2021. I am currently assigned to the Washington Field Office, Northern Virginia Resident Agency. I am on a squad that investigates darknet related narcotics trafficking and have been assigned to this squad since June 2021. Prior to being hired as a special agent with the FBI, I was a Corporal with the Collier County Sheriff's Office in Naples, Florida, and was so employed from April 2015 until January 2021. I have received formal training in the investigation of drug and violent crimes, including specialized training in evidence collection. I have experience investigating various types of crime, and I have investigated or assisted in the investigation of numerous cases involving violent criminal activity, narcotics, and crimes against persons and property. I have been a sworn law enforcement officer during all times herein.

3. During my time in law enforcement, I have participated in the application for and execution of numerous arrest and search warrants in investigations of narcotics offenses, resulting in the prosecution and conviction of numerous individuals and the seizure of illegal drugs, weapons, stolen property, and other evidence of criminal activity. Through my training and experience, I am familiar with the actions, habits, traits, methods, and terminology utilized by the traffickers and abusers of dangerous controlled substances.

4. Based on my training and experience relating to the investigations of drug traffickers, and, based upon interviews that I have conducted with other officers, defendants, informants, witnesses, and participants in drug trafficking activity, I am familiar with the ways that drug traffickers conduct their business. My familiarity includes the various means and methods by which drug traffickers import and distribute drugs, their use of cellular telephones, their use of vehicles, their use of storage facilities and/or third-party residences to house illicit items, tablet press machines, or proceeds from illicit activity, their use of clandestine locations to manufacture illicit tablets, their use of numerical codes and code words to conduct transactions,

and their means to conceal, convert, transmit, and transport their drug proceeds, including, but not limited to, the use of couriers and vehicles to transport currency and proceeds and the use of third parties to purchase or hold title to assets. As part of my training and experience, I have also investigated and arrested those who have been suspected of illegally manufacturing counterfeit tablets by utilizing tablet press machines and binding material.

5. Based on my training and experience, I am also familiar with the ways that drug traffickers utilize tablet press machines to manufacture and produce illicit controlled substances in a convenient, tablet form. I know, through training and experience, that manufacturing counterfeit tablets can be profitable for drug dealers. From past training and experience in recent tablet press machine cases, I have learned it is common for operators of clandestine tablet press operations to enlist the assistance of third persons or third-party addresses to purchase and/or receive machines, tablet components, and related products to avoid law enforcement scrutiny. Clandestine tablet press machines and binding material are often shipped to one location then relocated to a second location to avoid detection by law enforcement. Often, a clandestine tablet press operation may span across several different locations.

6. The statements in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause of the requested warrants and does not set forth all my knowledge about this matter.

#### **PROBABLE CAUSE**

7. The United States, including the FBI, the U.S. Postal Inspection Service (“USPIS”), and the Food and Drug Administration – Office of Criminal Investigations (“FDA-OCI”) (collectively, the “LAW ENFORCEMENT AGENCIES”), have been investigating a criminal

enterprise utilizing the darknet to facilitate the sale of controlled substances, primarily counterfeit Adderall<sup>1</sup> tablets made with methamphetamine.<sup>2</sup> Since October 2022, law enforcement has conducted over twenty (20) controlled purchases from the enterprise via the darknet on various darknet marketplaces (“DM”s).

# **I. Background on DMs**

8. A DM is hidden commercial website that operates on a portion of the Internet that is often referred to as the TOR network, darkweb, or darknet. A DM operates as a black market, known to sell or broker transactions involving legal productions as well as drugs, weapons, counterfeit currency, stolen credit card details, forged documents, unlicensed pharmaceuticals, child pornography, murder-for-hire, and other illicit goods.

9. Buyers typically purchase narcotics through DMs from “vendors” who accept digital currency, such as Bitcoin,<sup>3</sup> for payment. “Vendors” are the darknet’s sellers of goods and services, often of an illicit nature, and they do so through the creation and operation of “vendor accounts” on DMs. 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 clearnet (i.e., publicly available and accessible Internet) website. If a moniker on a particular marketplace has not already been registered by another user, vendors and customers

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<sup>1</sup> Adderall is a brand name for a central nervous stimulant, consisting of amphetamine and dextroamphetamine, and manufactured by Teva Pharmaceuticals. Adderall is a Schedule II controlled substance, used to treat attention deficit hyperactivity disorder and narcolepsy, and only available by prescription. A popular generic form of Adderall is an oval, orange tablet with “b974” debossed on one side and “30” on the other.

<sup>2</sup> Laboratory results for these tablets have found them to contain both “methamphetamine” and “methamphetamine (calc. as hydrochloride).”

<sup>3</sup> Bitcoin is a type of digital cryptocurrency. Functionally, it serves the same purpose as United States dollars, except that it is not tied to a central bank and is not regulated by a government body such as a treasury. Bitcoin transactions take place entirely online and offer a degree of anonymity to users. Bitcoin transactions are securely recorded on a public ledger called a “blockchain.” Based on my training and experience, individuals who are involved in criminal activity on the darknet often purchase items in Bitcoin to conceal the true nature of the funds from law enforcement.

can use the same moniker across multiple marketplaces.

10. I know, through my training and experience, that darknet drug vendors will often operate various darknet drug vendor accounts on various DMs. Some of these accounts have identical monikers and identical Pretty Good Privacy (“PGP”)<sup>4</sup> keys, while some accounts use different monikers and different PGP keys. When a darknet drug vendor has an identical moniker and PGP key across various DMs, it allows customers to trust that the darknet drug vendor is the same entity across various platforms. Conversely, when a darknet drug vendor uses different darknet drug vendor monikers and different PGP keys, it may disassociate a name with a particular darknet drug vendor. This is often done in attempts to evade law enforcement from linking multiple darknet vendor accounts to the same enterprise. For example, if one darknet drug vendor moniker was dismantled by law enforcement, the defendants could still operate under another.

## **II. Overview of Investigation**

11. Throughout the investigation, law enforcement has identified at least three darknet drug vendors operating under this enterprise: MrJohnson, NuveoDeluxe, and AllStateRx. These vendors take orders for counterfeit Adderall, containing methamphetamine, over the respective DMs they operate on.<sup>5</sup> The individuals operating the vendor pages would take cryptocurrency as payment for the drug orders, then mail the drugs through the United States Postal Service (“USPS”) to addresses provided by the customer. Since at least April 2022, the three darknet drug vendors

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<sup>4</sup> PGP is used on DMs to encrypt communications between vendors and customers. When a customer orders from, or contacts, a darknet drug vendor on a DM, that information may be stored on the DM’s database. Given concerns that the DM server may be hacked or seized by law enforcement, vendors and customers often communicate via PGP encrypted means to address this security problem. A vendor has both a PGP private key and a public key. A customer can use the vendor’s public key to encrypt a message. The vendor then uses the private key to decrypt the message. Vendors keep their private key secure but not their public key, which they generally put on their profile. This is done so customers may use a vendor’s PGP public key to encrypt data sent to the vendor, such as the customer’s name and address. Only the corresponding PGP private key, held by the vendor, can decrypt the data.

<sup>5</sup> Law enforcement was able to locate the vendor profiles for MrJohnson, NuveoDeluxe, and AllStateRx across several DMs to include Abacus, ASAP, Archetype, Tor2Door, Bohemia, and Incognito Markets.

have distributed more than approximately 13,000 suspected drug orders throughout the United States of America and have been mailed from at least three different United States federal districts, including the Middle District of Florida, the District of New Jersey, and the Eastern District of New York.

12. The investigation has identified three defendants primarily linked to these individual vendor pages: JOSEPH VASQUEZ (“JOSEPH”) to vendor NuveoDeluxe, JOSHUA VASQUEZ (“JOSHUA”) to vendor AllStateRx, and RAFAEL ROMAN (“ROMAN”) to vendor MrJohnson. While each individual is primarily associated with one respective account, as detailed throughout this affidavit, there are significant overlaps between the three vendors and defendants demonstrating that JOSEPH, JOSHUA, and ROMAN are conspiring to sell the same product over these individual vendor pages and are sharing the proceeds of the enterprise.

### **III. Identification of NuveoDeluxe and JOSEPH**

13. Law enforcement identified the NuveoDeluxe vendor page and began placing orders with NuveoDeluxe through an undercover operating as an Online Covert Employee (“OCE”). Analysis of previous buys from NuveoDeluxe determined that the Middle District of Florida was a significant deposit location by NuveoDeluxe to mail drugs.

14. On or about July 9, 2023, an OCE conducted an undercover purchase of what was advertised as 100 Adderall tablets from NuveoDeluxe on the ASAP darknet marketplace. The OCE provided an address in Fairfax County, Virginia, within the Eastern District of Virginia, where the drugs could be mailed.

15. The following day, on or about July 10, 2023, law enforcement conducted surveillance of several post offices within the Middle District of Florida. During surveillance, a white Jeep Cherokee, bearing New York license plate ending in -238 (“VEHICLE 1”), entered the

parking lot of the Clarcona Post Office, located at 7228 Clarcona-Ocoee Road, Clarcona, Florida. The driver, later identified as JOSEPH, exited VEHICLE 1 with several USPS Priority Mail Envelopes, entered the post office, and deposited them. The deposit was captured on surveillance footage, as shown below:



16. After making the deposit, JOSEPH left the post office and departed in VEHICLE 1. Law enforcement seized the parcels that JOSEPH deposited and found them to all have the same return address, with the sender's name listed as "PROFESSIONAL PAPER FILING INC.," which is a fictitious business.<sup>6</sup>

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<sup>6</sup> I know, through my training and experience, that when drugs are shipped through the mail, the senders generally do not want them back. To distance themselves from packages containing drugs, the return addresses and the names of senders are often fictitious or false. A fictitious or false address can be anything from an incorrect zip code to a non-existent house number, or a misspelled street. The name of the sender is also typically invalid. I have seen packages sent by persons with fictitious names, but more often, a search of law enforcement databases reflects that there is no association between the name of the sender and the address provided. In this instance, the sender, "Professional Paper Filing Inc." is a fictitious business. Though the street name was misspelled, the return address is associated with a



17. Surveillance followed VEHICLE 1 to several other post offices within the Middle District of Florida, including the Pine Hills Post Office, located at 811 Deauville Drive, Orlando, Florida. JOSEPH drove to the USPS collection box in the rear of the parking lot, deposited several parcels, and departed. Photographs of JOSEPH making the deposit from VEHICLE 1 are below:



18. After making the deposit, law enforcement retrieved the parcels that JOSEPH deposited. All parcels had the same fictitious return address, matching those described in paragraph 16: “PROFESSIONAL PAPER FILING INC.” One of the parcels deposited at this location was addressed to the undercover mailbox the OCE provided the day prior, as described in paragraph 14.

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legitimate company within the Middle District of Florida. The legitimate company contacted the local sheriff’s office to report numerous packages being “returned to sender” at their location which contained suspected narcotics. Law enforcement seized these packages, which the DEA Laboratory confirmed contained cocaine and counterfeit Adderall tablets made with a detectable amount of methamphetamine. One of these contained an undercover order placed with NuveoDeluxe which was initially mailed to the Eastern District of Virginia, before being “returned to sender.”



19. Law enforcement placed this parcel back in the mail stream. Several days later, law enforcement retrieved the same parcel at the address within the Eastern District of Virginia designated by the OCE. Within the parcel were one hundred thirteen (113) orange in color, oval in shape tablets debossed with “b974” on one side and “30” on the other. These tablets were confirmed by laboratory analysis to contain a detectable amount of methamphetamine with a net weight of 40.91 grams. A photograph of the tablets is below:



20. Directly after making the deposit, VEHICLE 1 exited the post office and merged onto a local highway. After passing through a toll booth, a deputy with the Orange County Sheriff's Office conducted a traffic stop on VEHICLE 1 for an obscured license plate. During the traffic stop, the driver and sole occupant of VEHICLE 1 identified himself as JOSEPH, the registered owner of the vehicle, and provided New York State Driver's License XXX XXX 363. JOSEPH told the deputy that he recently moved from New York to Orlando, Florida.

21. On the same day, law enforcement conducted a search of frequently used deposit locations by NuveoDeluxe within the Middle District of Florida, which found the below parcels. All had the same fictitious return address that was listed on the undercover order received by law enforcement and deposited by JOSEPH: “PROFESSIONAL PAPER FILING INC.”



#### **IV. Discovery of JOSEPH’s Florida P.O. Box, Identification of JOSHUA**

22. The investigation found that JOSEPH opened a P.O. Box within the Middle District of Florida (the “FLORIDA P.O. BOX”) with the same driver’s license that was provided to the deputy during the traffic stop described in paragraph 20. Analysis of parcels delivered to the FLORIDA P.O. BOX found that JOSEPH had received parcels primarily from New Jersey. In particular, law enforcement noticed parcels originating from 721 Atterbury Court E, Jackson, New Jersey (the “ATTERBURY RESIDENCE”).

23. Around the same time law enforcement discovered the FLORIDA P.O. BOX, law enforcement found that a 12-pound package, also shipped from New Jersey, was enroute to JOSEPH at the FLORIDA P.O. BOX. The package was intercepted prior to delivery, and on or about July 17, 2023, the Honorable Thomas G. Wilson, United States Magistrate for the Middle District of Florida, authorized law enforcement to search the package. *See* Mag. No. 8:23-mj-1863-tgw. The search found the package to contain approximately 5.5 kilograms of counterfeit Adderall tablets containing a detectable amount of methamphetamine—nearly 15,000 tablets. Specifically, these tablets were orange in color, oval in shape, with “b974” debossed on one side and “30” on the other. These tablets were visually similar to those sold by NuveoDeluxe and observed being deposited by JOSEPH, as described in paragraph 19:



24. Further investigation revealed that the multi-kilogram methamphetamine package was mailed from the post office located at 915 Bennetts Mills Road, Jackson, New Jersey (“JACKSON POST OFFICE”). The return address on the package was listed as “Atterbury Ct E, Jackson, New Jersey,” which is the same street of the ATTERBURY RESIDENCE. Surveillance and mail analysis later revealed that the ATTERBURY RESIDENCE is the home of JOSHUA and

is approximately five (5) miles away from the JACKSON POST OFFICE. Surveillance also revealed that JOSHUA drives a white Jeep Grand Cherokee, bearing New Jersey license plate ending in -5PP (“VEHICLE 2”).<sup>7</sup> A similar white SUV was seen by a local surveillance camera travelling to the JACKSON POST OFFICE shortly before the multi-kilogram methamphetamine package was mailed and then going in the opposite direction shortly after the package was dropped off. The road where the local surveillance camera was stationed is consistent with the route one would take from the ATTERBURY RESIDENCE to the JACKSON POST OFFICE. Law enforcement reviewed USPS business records for the tracking number of the package which found that it was tracked by an IP address attributed to JOSHUA’s telephone (“JOSHUA TELEPHONE 1”).<sup>8</sup> Due to this, among other reasons, law enforcement believes JOSHUA was the one who mailed the multi-kilogram methamphetamine package to JOSEPH’s FLORIDA P.O. Box.

25. On or about August 3, 2023, law enforcement conducted surveillance of the JACKSON POST OFFICE, where the multi-kilogram package was mailed from. During surveillance, JOSHUA was observed driving VEHICLE 2 as he pulled into the parking lot, deposited two USPS Priority Mail parcels, and departed.

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<sup>7</sup> While both vehicles are similar in appearance as both are white Jeep Grand Cherokees, VEHICLE 1 and VEHICLE 2 are different. VEHICLE 1 has New York license plate ending in -238, and has only been seen operated by JOSEPH within the Middle District of Florida. VEHICLE 2 has New Jersey license plate ending in -5PP, and has only been seen operated by JOSHUA within the District of New Jersey and the Eastern District of New York. VEHICLE 1 is registered to JOSEPH; VEHICLE 2 is registered to JOSHUA’s live-in companion (“UCC-1”).

<sup>8</sup> Throughout the investigation, JOSHUA operated multiple telephone numbers on several different devices using the subscriber name “Mr Jay” including, but not limited to: XXX-XXX-8030, XXX-XXX-0032, and XXX-XXX-8179. In response to a subpoena, it was found that JOSHUA had XXX-XXX-8030 listed as his telephone number on a popular e-commerce site. After this telephone number, JOSHUA began using XXX-XXX-0032. On July 19, 2023, two days after law enforcement executed the warrant on the package containing approximately 5.5 kilograms of counterfeit Adderall made with methamphetamine, that telephone number was terminated. JOSHUA then began using telephone number XXX-XXX-8179. The package containing the counterfeit Adderall tablets was tracked consistently by both XXX-XXX-0032 and XXX-XXX-8179. All three telephone numbers, XXX-XXX-8030, XXX-XXX-8179, and XXX-XXX-0032 maintained the same subscriber’s name and information, “Mr Jay.” For purposes of clarity and continuity, all telephone numbers subscribed to “Mr Jay” and believed to be used by JOSHUA will be listed as “JOSHUA TELEPHONE 1” throughout this affidavit.



26. Law enforcement seized one of the parcels that JOSHUA deposited. On or about August 10, 2023, the Honorable Edward S. Kiel, United States Magistrate Judge for the District of New Jersey, authorized law enforcement to search that parcel. *See* Mag. No. 23-mj-15188-esk. Within the parcel were nearly two pounds of tablets which were orange in color, oval in shape, with “b974” debossed on one side and “30” on the other, similar to those which were found in the multi-kilogram package mailed to JOSEPH, those sold by NuveoDeluxe, and those observed being deposited by JOSEPH, as described in paragraphs 19 and 23:<sup>9</sup>



**V. Identification of AllStateRx and AllStateRx’s Link to JOSHUA**

27. In August 2023, law enforcement identified another darknet vendor, AllStateRx, as selling significant amount of advertised counterfeit Adderall. In viewing AllStateRx’s presence on several DMs, law enforcement noticed several similarities between AllStateRx and NuveoDeluxe, some of which are detailed below:

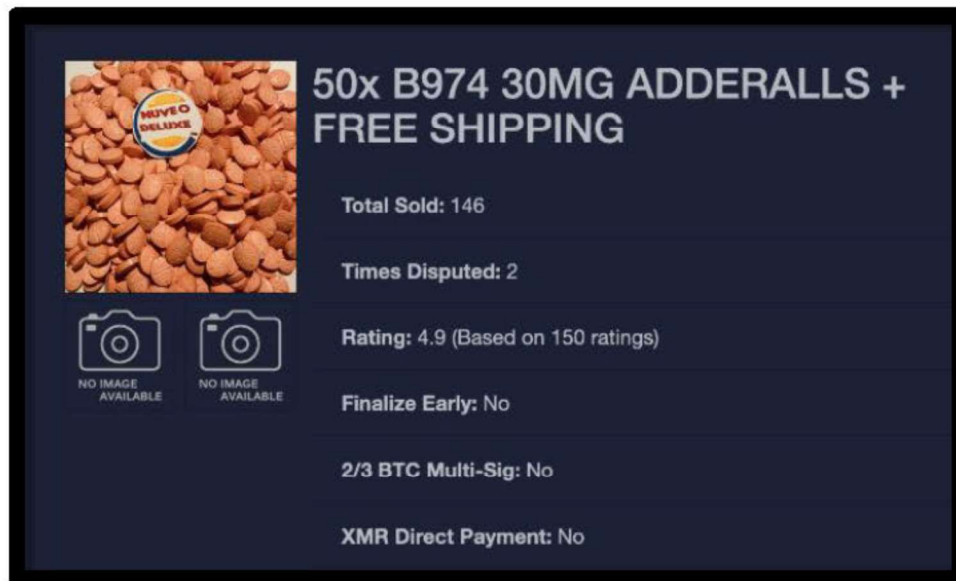
- a. Both advertised for sale “Adderall.”

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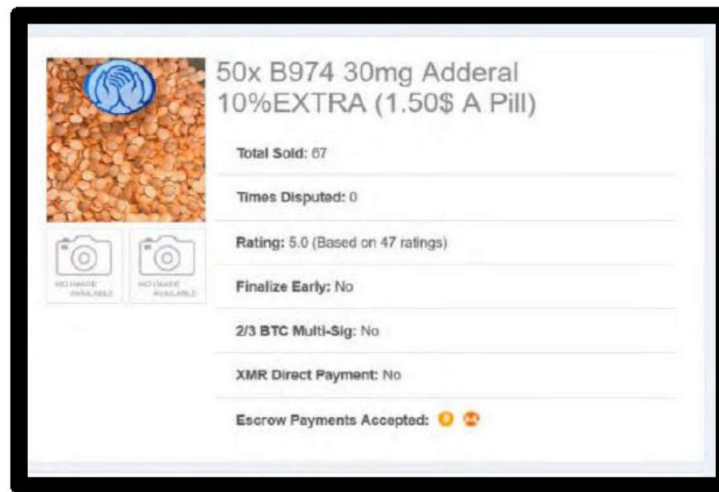
<sup>9</sup> Laboratory results are pending.

- b. Both claim the Adderall is “pressed.”<sup>10</sup>
- c. Both advertise the counterfeit Adderall similarly—quantity, followed by an “x,” then the imprints of the tablet. For example, 50 Adderall was listed by NuveoDeluxe, and AllStateRx as “50x Adderall B974 30mg” in varying order.
- d. Both sell the same type of counterfeit Adderall, a small, orange in color, oval in shape tablet, with “b974” debossed on one side and “30” on the other.
- e. Matching and/or similar return addresses on undercover orders.
- f. Visual similarities consist between the advertisements for NuveoDeluxe and AllStateRx below:

#### NuveoDeluxe Adderall Advertisement



<sup>10</sup> I know, based on my training and experience, that “pressed” indicates counterfeit tablets. Counterfeit tablets are fake medications that have different ingredients than the actual medication. They may contain no active ingredient, the wrong active ingredient, or have the correct ingredient but in an incorrect quantity. Counterfeit tablets may contain potentially lethal amounts of fentanyl, or, as found in this investigation, methamphetamine. Pressed tablets are dangerous because they often appear identical to legitimate prescription tablets, and the user is likely unaware of how lethal they can be.

**AllStateRx Adderall Advertisement**

28. In light of the similarities between the two vendors, both JOSEPH and JOSHUA directly depositing identical counterfeit Adderall tablets into the mail, JOSHUA's home address being linked to the seized multi-kilogram methamphetamine package, and JOSHUA TELEPHONE 1 tracking the multi-kilogram methamphetamine package enroute to JOSEPH, law enforcement identified the vendor AllStateRx and JOSHUA as potentially being linked to NuveoDeluxe and the ATTERBURY RESIDENCE.

29. On or about September 11, 2023, a law enforcement OCE accessed the Bohemia Market DM and ordered what was advertised as fifty (50) Adderall tablets from AllStateRx. The OCE provided an address in Fairfax County, Virginia, within the Eastern District of Virginia, where AllStateRx could send the tablets, and the OCE paid for the order with Bitcoin.



30. The following day, on or about September 12, 2023, law enforcement conducted surveillance at the ATTERBURY RESIDENCE and observed JOSHUA exit with a blue bag full of parcels, enter VEHICLE 2, and depart. JOSHUA drove directly from the ATTERBURY RESIDENCE to the JACKSON POST OFFICE—the same post office where the multi-kilogram package of counterfeit Adderall was mailed from, as described in paragraph 23. Once at the JACKSON POST OFFICE, surveillance footage showed JOSHUA walk to the USPS blue collection box in the parking lot and deposited five (5) USPS Priority Mail parcels:



31. After making that deposit, JOSHUA entered the JACKSON POST OFFICE and deposited fourteen (14) more USPS Priority Mail parcels.<sup>11</sup> Surveillance footage captured JOSHUA entering the JACKSON POST OFFICE:

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<sup>11</sup> After witnessing JOSHUA deposit parcels both inside and outside of the JACKSON POST OFFICE, law enforcement immediately retrieved them from their respective collection points.



32. Out of the nineteen (19) parcels that JOSHUA deposited at the JACKSON POST OFFICE that day, one (1) was for the undercover order placed the day prior with AllStateRx, as described in paragraph 29. Law enforcement allowed the undercover parcel to continue to its destination, and several days later law enforcement retrieved the parcel at the location designated by the OCE within the Eastern District of Virginia. Within the parcel were fifty-five (55) orange in color, oval, tablets debossed with “b974” on one side and “30” on the other. Laboratory analysis confirmed these tablets contained a detectable amount of methamphetamine with a net weight of 27.87 grams. As seen below, the tablets were visually consistent with those previously received in undercover orders from NuveoDeluxe deposited by JOSEPH and those contained in the multi-kilogram package mailed to JOSEPH, as described in paragraphs 19 and 23.

#### **VI. Investigation of MrJohnson, Identification of ROMAN**

33. During the investigation into JOSPEH and JOSHUA, law enforcement was investigating a separate darknet vendor: MrJohnson. The investigation into MrJohnson went back as far as October 2022, where an OCE made a purchase of advertised Adderall from MrJohnson on the Tor2Door DM. That order was shipped to an address in Prince William County, Virginia, within the Eastern District of Virginia. Laboratory analysis confirmed the pills contained a detectable amount of methamphetamine with a net weight of 40.43 grams.

34. The investigation into MrJohnson continued. Crucially, on or about September 21, 2023, a law enforcement OCE accessed the Bohemia DM and ordered 100 tablets advertised as Adderall from MrJohnson. The OCE provided an address within the District of New Jersey where MrJohnson could send the order.

35. Tracking data around this time showed undercover parcels placed with MrJohnson were shipping from Brooklyn, New York. Throughout September 2023, law enforcement spoke with employees at post offices within the Eastern District of New York and inquired about bulk USPS Priority Mail Envelope deposits. Employees at one post office specifically reported a male making frequent deposits of bulk items.

36. On or about September 27, 2023, law enforcement conducted surveillance of that post office in the Eastern District of New York. During surveillance, law enforcement observed a male, identified as ROMAN, exit a gray BMW, bearing New Jersey license plate ending in -NBC (“VEHICLE 3”)<sup>12</sup> and enter that post office with two large shopping bags, as shown below:

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<sup>12</sup> Although VEHICLE 3 has a New Jersey license plate, it is registered to a “ROMAN CASTRO” at an address within the Eastern District of New York. ROMAN has been observed operating this vehicle numerous times, including, as described later in this affidavit, during a traffic stop with the New York City Police Department in March 2023.



37. Once inside the post office, employees at the post office observed ROMAN deposit numerous parcels. The employee set the parcels aside for law enforcement. After examining the parcels, law enforcement seized two (2) of those parcels. On October 31, 2023, the Honorable James B. Clark III, United States Magistrate Judge for the District of New Jersey, authorized law enforcement to search both parcels. *See* 23-mj-12241-jbc and 23-mj-12242-jbc. Within each parcel were numerous orange in color, oval in shape tablets with “b974” debossed on one side and “30” on the other, similar to the tablets from NuveoDeluxe and AllStateRx. Laboratory analysis confirmed that these tablets contained a detectable amount of methamphetamine with a total net weight of 204.24 grams.

38. After making the above deposit, law enforcement followed ROMAN to another post office within the Eastern District of New York, the Homecrest Post Office located at 2302 Avenue U, Brooklyn, New York. ROMAN entered this post office with another shopping bag and made a deposit of several more parcels and departed. Law enforcement retrieved the parcels and found one of them to contain the undercover order placed on September 21, 2023, as described in

paragraph 34. Law enforcement opened that parcel and found it to contain numerous tablets that were orange in color, oval in shape, with “b974” debossed on one side and “30” on the other, matching what the OCE had ordered from MrJohnson and visually consistent with tablets previously sent by MrJohnson, NuveoDeluxe, and AllStateRx. Laboratory analysis confirmed that these tablets contained a detectable amount of methamphetamine with a net weight of 40.06 grams. The tablets are shown below:



**VII. Investigation Shows MrJohnson/ROMAN Involved in the Conspiracy**

39. As the investigation progressed into the fall/early winter of 2023, law enforcement noticed significant connections between all three vendor pages, as well as JOSEPH, JOSHUA, and ROMAN. As described in more detail below, in October 2023, ROMAN was captured by post office surveillance depositing parcels associated with NuveoDeluxe. Financial investigation of NuveoDeluxe, AllStateRx, and MrJohnson revealed cryptocurrency wallets associated with each vendor page were pooling cryptocurrency into a common cryptocurrency wallet that was being accessed by accounts tied to ROMAN. Finally, JOSHUA has been seen by surveillance visiting several properties in Brooklyn, NY associated with ROMAN. Surveillance of, and investigation into, these locations showed activity law enforcement believes is indicative of drug activity.

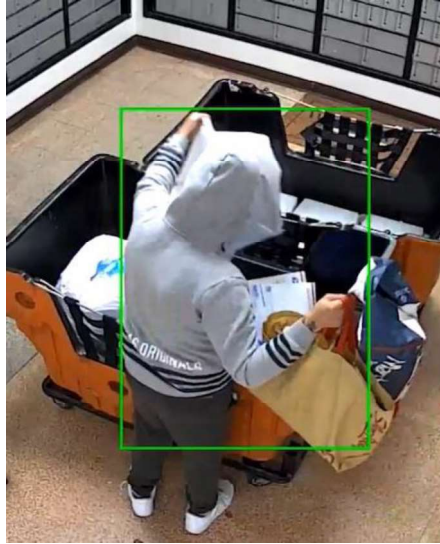


a. ROMAN Deposits Packages Associated with NuveoDeluxe

40. Surveillance into ROMAN during the fall of 2023 led law enforcement to a residence in Brooklyn, NY. Based on surveillance and mail analysis, law enforcement believes the residence is ROMAN's current residence ("ROMAN RESIDENCE"). On or about October 12, 2023, law enforcement observed ROMAN exit ROMAN RESIDENCE with several full shopping bags and enter VEHICLE 3:



ROMAN drove VEHICLE 3 to the same post office he previously deposited parcels at, within the Eastern District of New York, as described in paragraph 37. Once at the post office, ROMAN entered with the bags and deposited numerous USPS parcels:<sup>13</sup>



41. Law enforcement examined the parcels which were deposited by ROMAN above.

The sender listed on at least one of the parcels deposited is below:

**Quickfix Accessories LLC Gabrielle Munette  
845 Gates Ave  
Brooklyn, New York 11221**

The business and name listed above has no association with the return address listed for that business or individual. This fictitious return address was a common one used by NuveoDeluxe. At least four undercover orders placed with NuveoDeluxe had this exact return address. All four of those undercover orders placed with NuveoDeluxe contained counterfeit Adderall containing a detectable amount of methamphetamine, with a total net weight of 122 grams.

42. Law enforcement seized a different parcel that was deposited by ROMAN alongside the “Quickfix Accessories” and, on November 22, 2023, the Honorable Cathy L.

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<sup>13</sup> The post office, VEHICLE 3, and at least one of the bags used seen here were the same which ROMAN used to deposit drug parcels, as described in paragraph 37.



Waldor, United States Magistrate Judge for the District of New Jersey, authorized law enforcement to search the parcel. *See* 23-mj-9334-clw. Within the parcel were numerous round, orange tablets, debossed with “b974” on one side and “30” on the other, visually similar to those sold by MrJohnson, NuveoDeluxe, and AllStateRx.<sup>14</sup>

b. Cryptocurrency Investigation

43. A significant part of the investigation has been tracking the financial ties between the three vendor pages and defendants. When law enforcement conducts investigations involving virtual currency, it sometimes uses commercial services offered by several different blockchain-analysis companies. These companies analyze the Bitcoin blockchain and attempt to identify the individuals or groups involved in transactions. Specifically, these companies have developed proprietary software that analyzes all the data underlying each Bitcoin transaction on the Bitcoin blockchain and then groups related Bitcoin transactions into “clusters” based on that analysis. The methods employed by these blockchain analysis companies have been independently validated by computer scientists, who have shown that these “clustering” techniques provide accurate results. Additionally, through numerous, unrelated investigations, law enforcement has been able to corroborate the accuracy of the information provided via these third-party services.

44. Throughout this investigation, law enforcement has applied cryptocurrency analysis to determine the flow of proceeds from and to each individual vendor. It is common in darknet drug investigations for individuals involved with darknet vendors to utilize cryptocurrency to attempt to obscure their involvement with the vendor pages. This investigative strategy also uses intelligence gathered from other law enforcement investigations, which can include access to DM data. Utilizing these sophisticated investigative techniques, law enforcement identified

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<sup>14</sup> Laboratory analysis is pending.

several cryptocurrency wallets which received payments believed to be associated with MrJohnson (“MRJOHNSON WALLET”), NuveoDeluxe (“NUVEODELUXE WALLET”), and AllStateRx (“ALLSTATERX WALLET”).<sup>15</sup>

45. Regarding the NUVEODELUXE WALLET, law enforcement found that it continuously made payments to a Bitcoin exchange platform, which exchanges cryptocurrency for gift cards at popular retailers (“EXCHANGE BUSINESS 1”). In response to a request from law enforcement, EXCHANGE BUSINESS 1 provided information for those transactions, which found that payments initiated from the NUVEODELUXE WALLET ultimately were used to purchase gift cards which were redeemed by JOSEPH in his name. For these reasons, law enforcement believes JOSEPH controls the NUVEODELUXE WALLET.

46. Regarding the ALLSTATERX WALLET, law enforcement found that it also made payments to EXCHANGE BUSINESS 1 for gift cards. In response to a subpoena, EXCHANGE BUSINESS 1 provided information for those transactions, which found payments initiated from the ALLSTATERX WALLET were redeemed by JOSHUA and UCC-1 in their names. In response to a subpoena, it was found that an IP address attributed to JOSHUA TELEPHONE 1 was used for several of these orders. For these reasons, law enforcement believes JOSHUA controls the ALLSTATERX WALLET.

47. Further analysis found that cryptocurrency is continuously being transferred between the NUVEODELUXE WALLET and ALLSTATERX WALLET. The analysis has shown that, to date, NUVEODELUXE WALLET and the ALLSTATERX WALLET have transferred over \$130,000 in Bitcoin between each other. The most recent payment was for approximately \$9,000 in cryptocurrency on or about January 12, 2024. Based on JOSEPH’s

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<sup>15</sup> For purposes of clarity and continuity, the several cryptocurrency wallets associated with each vendor are referred to as a single unit.

connections to the NUVEODELUXE WALLET and JOSHUA's connections to the ALLSTATERRX WALLET, law enforcement believes that JOSEPH and JOSHUA were directly involved in these transfers.

48. Since June 2022 through the present, law enforcement discovered that the MRJOHNSON WALLET conducted transactions totaling over \$1,000,000 worth of Bitcoin while utilizing several other Bitcoin wallets associated with the MRJOHNSON WALLET (the "ASSOCIATE WALLETS"). Further analysis found a pattern of payments from MrJohnson being sent to the ASSOCIATE WALLETS and ultimately into accounts at a financial institution that operates a mobile payment application ("PAYMENT SERVICE 1").<sup>16</sup> Records from PAYMENT SERVICE 1 indicate that at least one of the accounts was registered to ROMAN using an IP address attributed to ROMAN RESIDENCE.

49. Another account at PAYMENT SERVICE 1 that received deposits from the ASSOCIATE WALLETS is registered to a different individual. However, cryptocurrency was deposited into this account and sold for U.S. currency, where it was regularly transferred, peer-to-peer, to the other aforementioned account registered directly to ROMAN. This account registered to a different individual was also accessed on several occasions from the same IP address registered to ROMAN at ROMAN RESIDENCE. To law enforcement's knowledge, the individual registered to this account has no association with ROMAN RESIDENCE, leading law enforcement to believe that ROMAN controls the account under a false registration name.

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<sup>16</sup> PAYMENT SERVICE 1 enables users to make retail payments using a smartphone, to send payments peer-to-peer to other users, and to buy and sell cryptocurrency for US currency, among other services.

50. Finally, from at least August to mid-September 2023,<sup>17</sup> the cryptocurrency analysis found that the MRJOHNSON WALLET, the NUVEODELUXE WALLET, and the ALLSTATE RX WALLET all sent cryptocurrency to the ASSOCIATE WALLETS. During this period, the ASSOCIATE WALLETS ultimately sent cryptocurrency to the same PAYMENT SERVICE 1 accounts accessed at ROMAN RESIDENCE and believed to be used by ROMAN.

51. Law enforcement believes the cryptocurrency wallets above are used exclusively for proceeds from illegal drug activity. Law enforcement reviewed income records for JOSEPH, JOSHUA, and ROMAN, which have reported to their respective states. None of the three individuals have reported levels of income that would explain the financial amounts involved above. Specifically, since the investigation began in 2022, ROMAN had no reportable income, JOSEPH had no reportable income,<sup>18</sup> and JOSHUA earned \$10,370.

52. I know, through my training and experience, that the exchange of cryptocurrency is the primary source of payment used in the trafficking of darknet narcotics. While certain cryptocurrencies, such as Bitcoin, broadcast transactions on a public ledger, those partaking in the cryptocurrency transactions are generally anonymous. The anonymity that cryptocurrency offers creates a platform for illicit activities, such as drug trafficking. Darknet drug vendors are normally paid in cryptocurrency and will typically exchange the cryptocurrency for other items of value, such as fiat currency, other cryptocurrencies, or gift cards. These types of cryptocurrency transactions typically consist of several steps, which ultimately masks the origin of the funds,

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<sup>17</sup> Subpoenas to PAYMENT SERVICE 1 for time periods after mid-September 2023 are still outstanding. However, law enforcement is still able to determine through its analysis that cryptocurrency is being sent from the ASSOCIATE WALLETS to PAYMENT SERVICE 1 after mid-September 2023. Therefore, law enforcement believes that the accounts at PAYMENT SERVICE 1 attributed to ROMAN are still receiving cryptocurrency from the ASSOCIATE WALLETS.

<sup>18</sup> JOSEPH recently began driving for a popular ride sharing service, though there is still no reportable income to either Florida, New York, or New Jersey.

leading to significant amount of money laundering.

c. JOSHUA Interactions with ROMAN and Properties Associated with ROMAN

53. Finally, surveillance has found JOSHUA directly interacting with ROMAN and properties associated with ROMAN, often involving JOSHUA delivering USPS parcels to locations or ordering items indicative of drug distribution to those properties associated with ROMAN. In September 2023, law enforcement observed JOSHUA drive VEHICLE 2 to a storage facility in New Jersey. In response to a subpoena, the storage facility provided subscriber information which showed that storage unit XX84 (“STORAGE UNIT 1”) was paid for in cash and rented to “Fredrico Sanchez” (“SANCHEZ”).<sup>19</sup>

54. On or about September 26, 2023, JOSHUA was observed driving VEHICLE 2 to the storage facility where STORAGE UNIT 1 was located. VEHICLE 2 stopped at STORAGE UNIT 1 for over one hour.

55. In December 2023, law enforcement discovered that JOSHUA and VEHICLE 2 frequent another storage unit. In response to a subpoena, this storage facility, which is located within the Eastern District of New York, provided subscriber information for storage unit XX56 (“STORAGE UNIT 2”), which found that it was rented to a LUIS SANTOS (“SANTOS”). Similar to STORAGE UNIT 1, this storage unit was paid for in cash and rented under an alias. The records returned pursuant to a subpoena reflected that on or about December 3, 2023, STORAGE UNIT 2 was paid for in cash. Surveillance captured the individual making the payment—that individual was JOSHUA:

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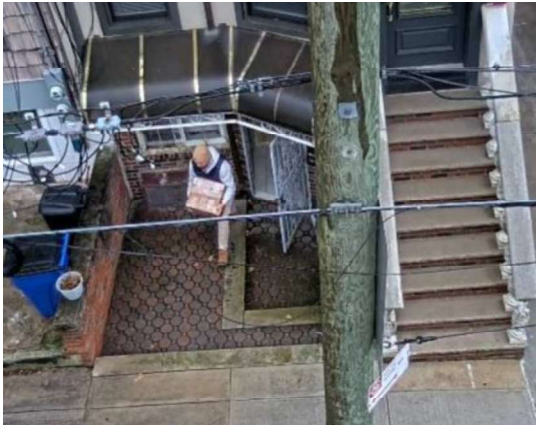
<sup>19</sup> Different variations of the SANCHEZ name were used as an alias by JOSHUA VASQUEZ throughout the investigation, including, but not limited to: “FREDRICO SANCHEZ,” “SANCHEZ FREDRICO,” “F SANCHEZ,” “FRED SANCHEZ,” “MR. SANCHEZ,” and “SANCHEZ.” For purposes of clarity and continuity, any variation of the FREDRICO SANCHEZ name throughout this affidavit will be referred to “SANCHEZ.”



56. I am aware, through my training and experience, that narcotics traffickers will often use storage facilities to store items, such as controlled substances, fiat currency, paraphernalia, and/or packaging material. I also know that these storage units are often paid for in cash and rented under an alias, oftentimes unbeknownst to management at the storage facility. Narcotics traffickers will sometimes have multiple storage units. Therefore, I believe that JOSHUA is the true renter of both STORAGE UNIT 1 and STORAGE UNIT 2 and is the true individual behind the SANCHEZ and SANTOS aliases.

57. Throughout the investigation, a residence within the Eastern District of New York ("EDNY LOCATION 1"), was found to be associated with the conspiracy. On or about January 9, 2024, surveillance saw that UPS delivered two packages to EDNY LOCATION 1. In response to a subpoena, it was found that both packages were addressed to SANTOS—the same alias that JOSHUA used to rent STORAGE 2 within the Eastern District of New York, as described in paragraph 55. Less than two hours later, surveillance saw JOSHUA arrive at EDNY LOCATION 1 in VEHICLE 2. JOSHUA entered EDNY LOCATION 1 and exited shortly thereafter with what law enforcement believes were both SANTOS packages, based on the size and appearance of the

packages and the time proximity:



58. Two days later, on or about January 11, 2024, surveillance saw USPS deliver a package to EDNY LOCATION 1. The package was also addressed to SANTOS. Less than ten minutes later, surveillance again saw JOSHUA arrive at EDNY LOCATION 1 in VEHICLE 2 and retrieve a package. Based on the appearance and size of the package and time proximity, law enforcement believes this was the SANTOS parcel. JOSHUA placed the parcel in VEHICLE 2, and departed:



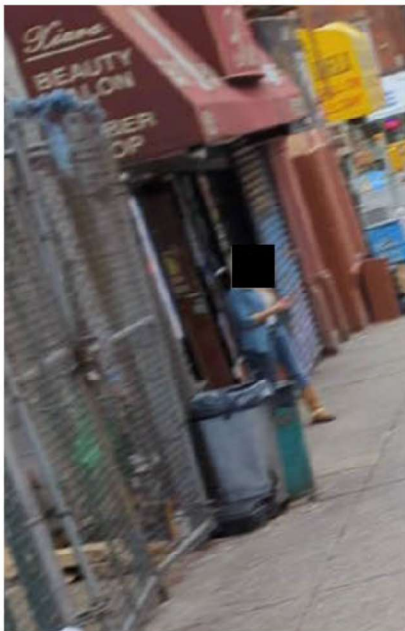
59. On or about January 11, 2024, after leaving EDNY LOCATION 1 with what law enforcement believes was the SANTOS package, JOSHUA drove to a nearby salon & barbershop, owned by ROMAN's sister ("EDNY LOCATION 2"). Once at EDNY LOCATION 2, JOSHUA



brought three boxes from VEHICLE 2 and placed them outside EDNY LOCATION 2:



60. JOSHUA brought the first two packages, left them outside of EDNY LOCATION 2, and returned to the vehicle to retrieve the third and final package. As he did so, a female approached and unlocked one of the doors at EDNY LOCATION 2 leaving it ajar for JOSHUA:



61. After the female left, JOSHUA brought all three boxes inside EDNY LOCATION
2. After being inside EDNY LOCATION 2 for several minutes, JOSHUA exited and departed:



62. Based on the above, law enforcement believes that the three packages that JOSHUA brought into EDNY LOCATION 2 are the three SANTOS packages that JOSHUA retrieved from EDNY LOCATION 1, as described in paragraphs 58 and 59.

63. Further investigation into EDNY LOCATION 2 has led law enforcement to believe that EDNY LOCATION 2 is being used as part of the charged conspiracy for several reasons:

- a. EDNY LOCATION 2 is a business, but is listed as the address for ROMAN on his driver's license;
- b. VEHICLE 2 is consistently found parked directly outside of EDNY LOCATION 2 at all hours of the day and/or night;
- c. USPS operates an online platform which allows customers to order postal products to be shipped to a location, free of charge. These products, such as Priority Mail and

Priority Mail Express boxes and envelopes, are commonly used by NuveoDeluxe, AllStateRx, and MrJohnson to mail drugs. In August and December 2023, orders were placed for hundreds of postal products and were shipped addressed to ROMAN at EDNY LOCATION 2, as well as the ROMAN RESIDENCE. In response to a subpoena, it was found that orders shipped to both the ROMAN RESIDENCE and EDNY LOCATION 2 were done so using an IP address attributed to the ROMAN RESIDENCE.

64. Finally, throughout the investigation, surveillance found JOSHUA driving VEHICLE 2 between STORAGE UNIT 2, both EDNY LOCATIONS 1 and 2, and ROMAN RESIDENCE. For instance, or about January 2, 2024, surveillance found VEHICLE 2 to be at STORAGE UNIT 2. After leaving the storage facility, JOSHUA drove VEHICLE 2 directly to ROMAN RESIDENCE. Once at ROMAN RESIDENCE, ROMAN met JOSHUA at the vehicle and both brought several boxes from VEHICLE 2 inside of ROMAN RESIDENCE, including what appeared to be a USPS box. ROMAN was wearing a red hooded sweatshirt, while JOSHUA

was wearing a gray hooded sweatshirt:



65. I know, through my training and experience, that individuals receiving packages containing controlled substances and paraphernalia, such as binding agents, often utilize fictitious names and addresses associated with third parties for the receipt of packages. It may appear counter-productive to have a package addressed to a fictitious name, but often the named recipient is not associated with the address. This provides plausible deniability to anyone receiving the package as to their knowledge of its contents. Sometimes drug packages are addressed to a location with multiple units, but without a specified unit location, with the expectation that the postal carrier will just leave it at the address. The intended recipient will then retrieve it from that location and hope to remain anonymous.

66. I further know that those receiving packages containing controlled substances and paraphernalia at times utilize co-conspirators as recipients of packages. These measures are



designed to limit exposure, and possible law enforcement detection, of each individual involved in the distribution chain.

67. Based on the above, I believe the ATTERBURY RESIDENCE, STORAGE UNITS 1 and 2, EDNY LOCATIONS 1 and 2, and the ROMAN RESIDENCE are being used to further the conspiracy to distribute methamphetamine.

#### **VIII. Summary of Narcotics Seized Throughout Investigations**

68. Since October 2022 through the present, law enforcement made numerous undercover purchases of counterfeit Adderall<sup>20</sup> tablets from MrJohnson, NuveoDeluxe, and AllStateRx using various DMs. The charts below summarize some of those undercover purchases and is not intended to be exhaustive of all undercover purchases made.

<b>NuveoDeluxe</b>						
<b>Buy</b>	<b>Date</b>	<b>Type</b>	<b>Amount</b>	<b>Lab Results</b>	<b>Weight</b>	<b>Mailed From</b>
1	5/8/23	Adderall	50	Methamphetamine	22.83g	Unknown <sup>21</sup>
2	6/15/23	Adderall	250	Methamphetamine	83.27g	MDFL <sup>22</sup>
3	7/5/23	Adderall	250	<i>Pending</i>	<i>Pending</i>	MDFL
4	7/9/23	Adderall	100	Methamphetamine	40.91g	MDFL
5	7/9/23	Adderall	100	Methamphetamine	40.77g	DNJ
6	8/2/23	Adderall	50	Methamphetamine	20.46g	EDNY
7	9/10/23	Adderall	50	Methamphetamine	21.48g	EDNY
8	9/29/23	Adderall	50	Methamphetamine	20.58g	EDNY
9	10/16/23	Adderall	50	Methamphetamine	20.27g	EDNY
10	10/16/23	Adderall	100	Methamphetamine	40.63g	EDNY
11	10/17/23	Adderall	50	Methamphetamine	20.55g	EDNY

<sup>20</sup> For all items in the below listed as “Adderall” is for suspected/confirmed counterfeit Adderall. Approximately 6.57 grams of cocaine was also received in undercover purchases from NuveoDeluxe, which is not shown in the graph.

<sup>21</sup> This parcel was not scanned by USPS for the entirety of the travel through the postal system, however, law enforcement believes this parcel originated in the Middle District of Florida.

<sup>22</sup> Middle District of Florida.

12	10/18/23	Adderall	100	Methamphetamine	41.02g	EDNY
13	12/4/23	Adderall	25	<i>Pending</i>	<i>Pending</i>	Unknown <sup>23</sup>

<b>AllStateRx</b>						
Buy	Date	Type	Amount	Lab Results	Weight	Mailed From
1	8/16/23	Adderall	50	<i>Pending</i>	<i>Pending</i>	EDNY
2	9/11/23	Adderall	50	Methamphetamine	27.87g	DNJ
3	10/1/23	Adderall	50	Methamphetamine	22.83g	DNJ
4	12/4/23	Adderall	250	Methamphetamine	97.68g	EDNY

<b>MrJohnson</b>						
Buy	Date	Type	Amount	Lab Results	Weight	Mailed From
1	10/27/22	Adderall	100	Methamphetamine	40.43g	DNJ <sup>24</sup>
2	3/20/23	Adderall	100	Methamphetamine	37.2g	Unknown
3	5/5/23	Adderall	100	<i>Pending</i>	<i>Pending</i>	Unknown
4	6/25/23	Adderall	50	Methamphetamine	20.75g	Unknown
5	8/3/23	Adderall	50	Methamphetamine	18.9g	Unknown
6	9/21/23	Adderall	100	Methamphetamine	40.06g	EDNY
7	10/17/23	Adderall	100	Methamphetamine	41.25g	EDNY
8	10/24/23	Adderall	50	Methamphetamine	19.95g	EDNY
9	10/24/23	Adderall	100	Methamphetamine	39.56g	EDNY

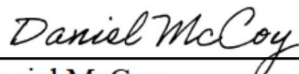
<sup>23</sup> This parcel was not scanned by USPS for the entirety of its travel through the postal system until reaching the Eastern District of Virginia. However, the return address for this package was based in Brooklyn, NY.

<sup>24</sup> District of New Jersey.



**CONCLUSION**

69. Throughout the investigation, law enforcement has purchased or seized more than 5,000 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. Based on the facts set forth above, I respectfully submit that there is probable cause to believe that, from at least in or around June 2023 and continuing through the present, within the Eastern District of Virginia and elsewhere, the defendants, JOSEPH VASQUEZ, JOSHUA VASQUEZ, and RAFAEL ROMAN, did knowingly and intentionally combine, conspire, confederate, and agree with each other and others, known and unknown, to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 846.

Respectfully submitted,

  
\_\_\_\_\_  
Daniel McCoy  
Special Agent  
Federal Bureau of Investigation

Attested to in accordance with the requirements of  
Fed. R. Crim. P. 4.1 via telephone on February 9, 2024:

  Digitally signed by Ivan Davis  
Date: 2024.02.09 13:49:40 -05'00'  
\_\_\_\_\_  
Hon. Ivan D. Davis  
United States Magistrate Judge  
Eastern District of Virginia