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

Alexandria Division

UNITED STATES OF AMERICA

**UNDER SEAL** 

v.

YOUNIS ABDULKADIR,

Defendant

No. 1:25-MJ-13

# AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Patrick Maxwell, being duly sworn, depose and state the following:

## **INTRODUCTION**

- 1. This affidavit is submitted in support of a criminal complaint and arrest warrant charging YOUNIS ABDULKADIR, also known as "Pacboy," "Lul y" and/or "Lil Y" (hereinafter ABDULKADIR), with conspiracy to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, known as fentanyl, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841 and 846.
- 2. I have been a sworn law enforcement officer in Arlington County, Virginia since 2007. I am currently assigned to the Organized Crime Section Drug Enforcement Vice Unit. I am currently deputized with the Federal Bureau of Investigation (FBI) TOC West Task Force, as well as the Drug Enforcement Administration (DEA) Northern Virginia Mass Transportation Initiative (NVMTI). I have investigated hundreds of criminal offenses and received convictions

from those investigations in the courts of Arlington County, Virginia and the Eastern District of Virginia. I have been certified as an Expert Witness in the General District Courts of Arlington County, Virginia, in the past, regarding narcotics possession and distribution. I have received specialized training in narcotics recognition, interdiction, and prosecutions, cell phone investigative techniques, cyber investigations, and extensive other training from various police academies, the DEA, and other federal agencies.

- 3. This affidavit is based upon my knowledge of the investigation of ABDULKADIR, information provided to me by law enforcement officials from various other agencies, including the Arlington County Police Department (ACPD), the Federal Bureau of Investigation (FBI), the Drug Enforcement Administration (DEA), the United States Postal Inspection Service (USPIS), and the Fairfax County Police Department (FCPD), as well as my review of documents and records, physical surveillance, the results of search warrants, and other information gathered during this investigation. Of particular importance in this investigation are the cellphones seized from several of the co-conspirators. Several of these cellphones contain messages exchanged among co-conspirators in which they discuss the acquisition and distribution of fentanyl. I have also reviewed social media accounts of the co-conspirators and photographs posted to those accounts, as well as other photographs saved on several of these phones.
- 4. Based on this evidence as set forth in the facts below, I submit there is probable cause to believe that ABDULKADIR has conspired with others to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, known as fentanyl, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841 and 846, as well as other federal offenses not specifically charged in the proposed criminal complaint.

#### FACTS SUPPORTING PROBABLE CAUSE

## A. Background and Overview of the Criminal Case

- 5. The evidence gathered during this investigation demonstrates that beginning in or about 2022, and continuing until at least in or about June 2024, in the Eastern District of Virginia and elsewhere, ABDULKADIR and others, including Jonathan ORDONEZ, also known as "Krazy," (hereinafter ORDONEZ), Amir VILLALTA, also known as "Meer" and/or "Slutty" (hereinafter VILLALTA), Jose Eduardo FUNES, also known as "Jojo" or "Jo" (hereinafter FUNES) and others, known and unknown, conspired to obtain thousands of counterfeit pills containing fentanyl from sources of supply, including a source of supply in California. The California-based source of supply, referred to by the co-conspirators as "Los," typically shipped the counterfeit pills in parcels through the United States Postal Service (USPS). The parcels were delivered to various addresses in the greater Washington, D.C., metropolitan area, including in the Eastern District of Virginia. Upon receipt of these parcels, the co-conspirators distributed the counterfeit pills containing fentanyl to their customers in the Eastern District of Virginia and elsewhere.
- 6. During the course of the investigation, in November 2022, investigators with the USPIS, DEA, and FBI intercepted one parcel sent via USPS that contained approximately 548.5 grams of fentanyl. Investigators subsequently identified eight additional suspicious parcels sent between January and April 2024 that had similar shipping characteristics to the seized parcel. None of the additional eight parcels was seized; however, based on financial records and messages exchanged among the co-conspirators, investigators believe these eight parcels also contained thousands of counterfeit pills containing fentanyl, and were sent by Los to the co-conspirators and

delivered to locations in the greater Washington, D.C. metropolitan area. These nine parcels are set forth in the table below (*see* Chart 1).

Recipient Address	Shipped	<u>Delivery</u>	Tracking Number	Weight	Reference in this
	<u>Date</u>	<u>Date</u>			<u>Affidavit</u>
Commons Dr,	11/28/2022	11/29/2022	EI469534748US	3 pounds	"SUBJECT PARCEL 1"
Annandale, VA					
Blundell Road	1/31/2024	2/2/2024	9505 5140 2026	4 pounds and 4	"SUBJECT PARCEL 2"
Falls Church, VA			4031 5236 10	ounces	
Blundell Road	2/8/2024	2/9/2024	EK800985094US	3 pounds and 1	"SUBJECT PARCEL 3"
Falls Church, VA				ounce	
Delaware Drive	2/12/2024	2/22/2024	EI952250003US	2 pounds and	"SUBJECT PARCEL 4"
Oxon Hill, MD				13 ounces	
Blundell Road	3/25/2024	3/26/2024	EI966626775US	4 pounds and 4	"SUBJECT PARCEL 5"
Falls Church, VA				ounces	
Delaware Drive	3/29/2024	4/1/2024	EI952245184US	3 pounds and	"SUBJECT PARCEL 6"
Oxon Hill, MD				9.6 ounces	
Blundell Road	3/29/2024	4/1/2024	9405 5362 0624	7 pounds and	"SUBJECT PARCEL 7"
Falls Church, VA			8688 0962 47	.48 ounces	
Craig Street	4/13/2024	4/17/2024	9505 5131 7786	1 pound and 6	"SUBJECT PARCEL 8"
Sterling, VA			4104 8557 70	ounces	
Delaware Drive	4/22/2024	4/23/2024	EI953114035US	1 pound and 12	"SUBJECT PARCEL 9
Oxon Hill, MD				ounces	

Chart 1: Summary of identified parcels

7. As part of this investigation, co-conspirators ORDONEZ, VILLALTA, and FUNES were charged separately by criminal complaint in the Eastern District of Virginia on June 17, 2024, July 1, 2024, and November 1, 2024 respectively. On October 18, 2024, ORDONEZ pleaded guilty pursuant to a plea agreement and accompanying statement of facts to a three-count Criminal Information charging him with conspiracy to distribute 400 grams or more of fentanyl in violation of 21 U.S.C. §§ 841 and 846, possession with intent to distribute fentanyl in violation of 21 U.S.C. § 841(a)(1), and using and carrying a firearm during and in relation to a drug trafficking crime in violation of 18 U.S.C. § 924(c). *See* Case No. 1:24-CR-226 at Dkt. 31, 33, and 34. On October 30, 2024, VILLALTA pleaded guilty pursuant to a plea agreement and accompanying statement of facts to a two-count Criminal Information charging him with conspiracy to distribute 400 grams or more of fentanyl in violation of 21 U.S.C. §§ 841 and 846, and possession with intent

to distribute fentanyl in violation of 21 U.S.C. § 841(a)(1). *See* Case No. 1:24-CR-237 at Dkt. 36, 38, and 39. FUNES's charges remain pending. *See* Case No. 1:24-MJ-440.

- 8. As described in more detail below in Paragraphs 9 12, before ORDONEZ, VILLALTA, and FUNES were charged federally, all three individuals were arrested by various law enforcement agencies during the course of the investigation. At the time of the respective arrests, the law enforcement agencies seized cellphones from ORDONEZ, VILLALTA, and FUNES, and searched the cellphones pursuant to search warrants.
- 9. On December 29, 2022, the FCPD arrested ORDONEZ during an investigation into a gang related shooting that occurred on December 17, 2022 in Fairfax County, Virginia. FCPD seized several firearms and a cellphone from ORDONEZ during that arrest. FCPD obtained a Virginia state search warrant to search ORDONEZ's 2022 cellphone.
- 10. On March 20, 2024, ACPD arrested ORDONEZ on state charges, including possession with the intent to distribute fentanyl. At the time of ORDONEZ's arrest, he had a loaded Glock 23 semi-automatic pistol in his waistband under his shirt, and a cellphone. ACPD also searched ORDONEZ's residence, where they located and seized fentanyl pills, two additional firearms, ammunition, and various other firearm accessories and drug paraphernalia. ACPD obtained a Virginia State search warrant to search ORDONEZ's 2024 cellphone.
- 11. On April 5, 2024, at approximately 4:00 a.m., the United States Secret Service (USSS) observed VILLALTA asleep in his vehicle in front of a traffic light on Wisconsin Avenue in Washington, D.C. When the USSS awoke VILLALTA, VILLALTA attempted to flee, crashed into a curb, and was arrested. Pursuant to a search of VILLALTA and the vehicle incident to the arrest, USSS officers seized, among other things, approximately 1,025 counterfeit pills containing fentanyl, approximately \$1,012 in U.S. currency, a digital scale, Ziploc bags, and a cellphone.

ACPD subsequently obtained VILLALTA's cellphone from the USSS. ACPD obtained a Virginia State search warrant to search VILLALTA's cellphone.

- 12. Only July 5, 2024, the FCPD attempted to stop FUNES while he was operating a motor vehicle, but FUNES fled from the officer. FCPD subsequently obtained an arrest warrant for FUNES. On July 19, 2024, the FCPD arrested FUNES on an outstanding warrant. During his arrest, FUNES was found to be in possession of 11 counterfeit pills containing fentanyl, a Glock firearm, and a cellphone. FCPD obtained a Virginia State search warrant to search FUNES's cellphone.
- 13. During the review of downloaded phone data of phones seized from the coconspirators, several conversations, photographs, and videos were discovered that are indicative of narcotics trafficking. This data has been of particular importance in this investigation.
- 14. A review of this downloaded phone data reveals that ABDULKADIR conspired with ORDONEZ, VILLALTA, FUNES, and others to distribute fentanyl beginning at least in or about 2022 and continuing into 2024.

## B. <u>2022 Seized Parcel ("SUBJECT PARCEL 1")</u>

15. On November 29, 2022, inspectors with the USPIS intercepted a parcel they deemed suspicious sent via the USPS ("SUBJECT PARCEL 1"). SUBJECT PARCEL 1 was sent from Los Angeles, California to an address in Annandale, Virginia. On November 29, 2022, Postal Inspectors with USPIS intercepted SUBJECT PARCEL 1 at a post office in Annandale, Virginia. Later that day, an individual identifying herself as the recipient attempted to retrieve SUBJECT PARCEL 1. A Postal Inspector asked the individual for her consent to search the parcel; she declined and departed the post office.

- 16. A few days later, on December 8, 2022, USPIS and the DEA executed a search warrant (1:22-SW-631) on SUBJECT PARCEL 1, and found that it contained more than 5,000 counterfeit oxycodone pills. The pills were blue and marked with an "M" in a square on one side and a "30" on the other side. The pills were submitted to the DEA Mid-Atlantic Laboratory, where they testified positive for fentanyl and had a net weight of approximately 548.5 grams.
- 17. Upon review of ORDONEZ's cellphone that was seized in 2022, investigators located a screenshot of the USPS tracking data related to SUBJECT PARCEL 1, as well as a screenshot of the Notes Application with information that matched the sender and recipient details listed on the label of SUBJECT PARCEL 1.
- 18. Investigators also located information within ORDONEZ's cellphone that indicated that ABDULKADIR was involved in the conspiracy to obtain SUBJECT PARCEL 1. On November 29, 2022, the same day on which USPIS intercepted SUBJECT PARCEL 1, ORDONEZ exchanged messages with another co-conspirator. The two discussed sending money to Los. ORDONEZ wrote "Younis gon give u it." I understand this message to mean that ABDULKADIR was to pay the money that would subsequently be sent to Los as payment for SUBJECT PARCEL 1. ABDULKADIR is the only known associate of ORDONEZ's with the first name "Younis."

#### C. 2022 Conversations Indicative of Narcotics Trafficking

19. Within multiple cellphones searched and seized pursuant to this investigation, law enforcement learned that ABDULKADIR utilized a telephone number ending in -9754 from 2022 through early 2024. Law enforcement determined that ABDULKADIR was the user of this telephone number based on numerous factors. First, the telephone number ending in -9754 was saved in ORDONEZ's cellular telephones as "Younis"; ABDULKADIR is ORDONEZ's only known associate with the name "Younis." Second, the user of the telephone number ending in -

9754 is referred to by various nicknames in the cellphones seized from co-conspirators; law enforcement understands that these nicknames are references to ABDULKADIR. Third, in December 2022, the user of the telephone number ending in -9754 sent a voice note (i.e., a recorded message) to ORDONEZ. The voice on the voice noted sounded identical to the voice of ABDULKADIR captured in the conversations recorded on the Arlington County Detention Center's inmate phone system (described in more detail below). All subsequent chats discussed in this affidavit represent chats in which ABDULKADIR utilized the telephone number ending in -9754.

20. Within ORDONEZ's cellphone that was seized in 2022, I located numerous conversations between ABDULKADIR, ORDONEZ, and another unindicted co-conspirator ("UCC-1"). Based on my training, experience, and knowledge of the investigation, I understand that, as is depicted in these conversations, UCC-1 regularly obtained quantities of fentanyl pills from ORDONEZ and ABDULKADIR. In return, UCC-1 regularly allowed ORDONEZ and ABDULKADIR to utilize UCC-1's vehicle to distribute the fentanyl pills. For example, in the following conversation, which occurred at the approximate dates and times listed in Universal Time (see Figure 1, below), UCC-1 told ORDONEZ that if ORDONEZ and ABDULKADIR were "servin," then they could keep UCC-1's vehicle another day. I know that "servin" is a common slang term used to describe the sale of narcotics to customers. UCC-1 then told them to "pu" (which I understand to be short for "pull up") to "mine" and that they could keep the car for another day. Based on my knowledge of the investigation to date, I understand that, in this conversation, UCC-1 told ORDONEZ that if ORDONEZ and ABDULKADIR sold narcotics to UCC-1's customer, then they could keep using UCC-1's car.

<u>Date/Time</u>	ORDONEZ	UCC-1
12/17/2022 5:12:57 PM	Younis is waking up right now and on the way I had to go	
12/17/2022 5:13:15 PM		Was boutta say
12/17/2022 5:13:29 PM		If yall servin rn u guys can keep the car another day
12/17/2022 5:13:34 PM		If not imma need wheels
12/17/2022 5:17:20 PM	It's really up to you if u need it let me know so I can tell him	
12/17/2022 5:17:42 PM		Thats why im askin u
12/17/2022 5:27:19 PM		?
12/17/2022 5:27:35 PM	I'ma just wake him right	
12/17/2022 5:27:43 PM	Ion want u stressing to do sum	
12/17/2022 5:27:50 PM	Unless u already have a ride like planned	
12/17/2022 5:28:03 PM		Nah ur not understanding me
12/17/2022 5:28:17 PM		Are yall servin?
12/17/2022 5:28:31 PM	Yeah that's why we in Annandale	
12/17/2022 5:28:46 PM	We like like 3 swerves each	
12/17/2022 5:28:53 PM	But they all close to eachother	
12/17/2022 5:29:01 PM		Bet pu to mine and yall can keep the car
12/17/2022 5:29:17 PM	Ok	

Figure 1: Chat between ORDONEZ and UCC-1

21. Additional conversations between ORDONEZ and ABDULKADIR in 2022 found in ORDONEZ's cellphone that was seized in 2022 reveal that ORDONEZ and ABDULKADIR

distributed fentanyl pills together. Based on my training, experience, and knowledge the investigation to date, I understand that, in the following conversation, which occurred at the approximate dates and times listed in Universal Time (see Figure 2, below), ORDONEZ asked ABDULKADIR for "jaunts," a slang term used to describe fentanyl pills, because ORDONEZ had "plays," a slang term used to describe narcotics customers. ABDULKADIR confirmed that he (ABDULKADIR) did have the "jaunts." ABDULKADIR and ORDONEZ then discussed a location for the narcotics transaction to occur. The following conversation is an excerpt and is not depicted in its entirety.

<u>Date/Time</u>	<u>ABDULKADIR</u>	<u>ORDONEZ</u>
12/11/2022 2:11:28 AM		Yo
12/11/2022 2:11:32 AM		I got plays
12/11/2022 2:11:34 AM		Texting me
12/11/2022 2:11:39 AM		U got jaunts?
12/11/2022 2:11:48 AM		And are u finished washing ur clothes.
12/11/2022 2:11:51 AM	Yes papa	
12/11/2022 2:11:59 AM		Yes to which?
12/11/2022 4:45:18 AM	Yoo	
12/11/2022 4:45:25 AM	Send me addy	
12/11/2022 4:54:37 AM		Come my location
12/11/2022 4:54:58 AM	Nah the send me the addy	
12/11/2022 4:55:02 AM	I got a play pushing up	
12/11/2022 4:55:11 AM		Nah bro don't send it here
12/11/2022 4:55:22 AM	Send me the addy	
12/11/2022 4:55:23 AM		I'm not tryna have that around me rn bruva
12/11/2022 4:55:28 AM	I'm bouta find a spot down the street	
12/11/2022 4:55:33 AM		Dat shyt flamming

12/11/2022 4:55:36 AM	Ima send u a addy
12/11/2022 4:55:55 AM	[Address in Falls Church, Virginia]

Figure 2: Chat between ORDONEZ and ABDULKADIR

22. Additional conversations between ORDONEZ and ABDULKADIR in 2022 revealed that they also conspired to obtain firearms and to provide others with firearms. Based on my training, experience, and knowledge of the investigation to date, I understand that, in the following conversation, which occurred at the approximate dates and times listed in Universal Time (see Figure 3, below), ORDONEZ asked ABDULKADIR to sell ORDONEZ a "stick," a slang term for a firearm, for \$500. ORDONEZ clarified that he wanted to buy the "Ghost19," which I understand to be a reference to a Glock 19 ghost gun. ABDULKADIR replied that he already had another purchaser of that Glock 19 ghost gun, who would buy it for \$600. ORDONEZ then requested a M&P, which I understand to be a reference to a Smith and Wesson M&P series firearm. ABDULKADIR confirmed that he had that firearm available, and agreed to give it to ORDONEZ. ORDONEZ then told ABDULKADIR that ORDONEZ would come "scoop" it in a bit, meaning that ORDONEZ would retrieve the firearm from ABDULKADIR. ABDULKADIR then replied that he was not at home, but that he would "spin back to da crib n grab it." This indicates to me that the firearm was likely at ABDULKADIR's residence.

<u>Date/Time</u>	<u>ABDULKADIR</u>	<u>ORDONEZ</u>
12/23/2022 11:27:17 PM		Sell me da stick for 500
12/23/2022 11:27:24 PM		Ghost19
12/23/2022 11:27:50 PM	Damn baby I don't wanna do u like that	

<sup>&</sup>lt;sup>1</sup> A "ghost gun" is a privately made firearm that does not have a serial number or other identifying markings placed by a licensed manufacturer at the time the firearm was produced.

The possession of a firearm in furtherance of a drug trafficking crime is punishable under 18 U.S.C. § 924(c).

12/23/2022 11:28:01 PM		I have a flip
12/23/2022 11:28:14 PM	Nah cuz I got Zu for 600	
12/23/2022 11:28:21 PM		Oh
12/23/2022 11:28:30 PM	I jus haven't done it cuz I'm waing for another stuck	
12/24/2022 2:00:41 AM		Who got da m&p
12/24/2022 2:00:47 AM	Me	
12/24/2022 2:00:59 AM		Ima come scoop it
12/24/2022 2:00:39 AW		inna bit
12/24/2022 2:00:39 AM	I'm not home	_
	I'm not home	_
12/24/2022 2:01:04 AM	I'm not home	inna bit
12/24/2022 2:01:04 AM 12/24/2022 2:01:10 AM	I'm not home  Imma spin back to da crib n grab it	inna bit Wya?

Figure 3: Chat between ORDONEZ and ABDULKADIR

### D. 2024 Conversations Indicative of Narcotics Trafficking

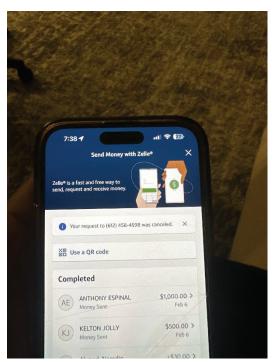
- 23. The evidence in this investigation indicates that the co-conspirators, including ABDULKADIR, continued to exchange messages indicative of narcotics trafficking into 2024, and conspired to obtain SUBJECT PARCELS 2 through 9, which are outlined in Chart 1, above. Some of these parcels are discussed in further detail, below.
- 24. For example, on February 6 and 7, 2024, ABDULKADIR and VILLALTA exchanged a series of messages in which they discussed obtaining a resupply of fentanyl pills from Los. These messages occurred at the approximate dates and times listed in Universal Time minus 5 hours (*see* Figure 4, below). Based on the date of these messages, they appear to concern SUBJECT PARCEL 3. VILLALTA told ABDULKADIR that Los would send the parcel "tn" (which I understand to mean "tonight"), but that Los had not yet sent VILLALTA the "flick of

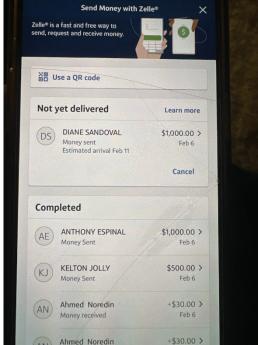
which joints they is." I understand that, in this conversation, VILLALTA told ABDULKADIR that Los was going to send VILLALTA a "flick" (meaning a video) of the fentanyl pills so that VILLALTA could see the quality of the pills. ABDULKADIR then discussed sending \$2,500 owed to Los. VILLALTA then provided three telephone numbers tied to various Zelle accounts; based on my knowledge of the investigation to date, I know that these Zelle accounts are all associated with Los. ABDULKADIR then sent approximately \$2,500 to these three Zelle accounts.

<u>Date/Time</u>	ABDULKADIR	<u>VILLALTA</u>
2/6/2024 6:05:01 AM		Yes los said he was gonna go see em tn but I guess he didn't cuz he ain't send me a flick but he said they gonna be da same ones or better ones but fosho same ones
2/6/2024 6:05:21 AM		He jus hit me said inna am he gonna send me flick of which joints they is
2/6/2024 6:05:54 AM		Shi don't matta fr Niccas gonna grab em regardless Yahearme! Unless they dirt fuckin trash yuh but regardless Niccas still grabbing if they come out decent
2/6/2024 6:06:07 AM		But I kno they gonna be good ones cuz he don't fail me nd he ain't fail last one
2/6/2024 2:46:03 PM		It's late ashit u boutta make us miss dis whole shit
2/6/2024 2:46:10 PM		Chris last day off today moe
2/6/2024 2:49:21 PM	Wym	
2/6/2024 2:49:24 PM	I sent my shit	
2/6/2024 2:49:36 PM		Nicca still sleeping bra
2/6/2024 2:49:42 PM		My fault
2/6/2024 2:49:47 PM		Meant to send dat to Krazy

2/6/2024 2:49:56 PM	Dat nigga trippin	
2/6/2024 7:32:48 PM	What's the number	
2/6/2024 7:33:11 PM	For this 2500	
2/6/2024 7:33:11 PM		(310) 493-7284 - 500
		(310) 469-8911 - 1k
2/6/2024 7:33:19 PM		First do dis ^
2/6/2024 7:38:23 PM	(see Figure 5)	
2/6/2024 7:38:24 PM	1k left	
2/6/2024 7:43:32 PM		Ite
2/6/2024 7:44:37 PM		(323) 803-6657 - 1k
2/6/2024 7:47:03 PM		We good cro we don't need to rush no mo
2/6/2024 7:47:16 PM	(see Figure 6)	
2/7/2024 10:27:41 PM	What's the cash app	
2/7/2024 10:27:49 PM	Before my phone die	
2/7/2024 10:48:36 PM		\$elberna31
2/7/2024 11:01:43 PM	(see Figure 7)	

Figure 4: Chat between ABDULKADIR and VILLALTA





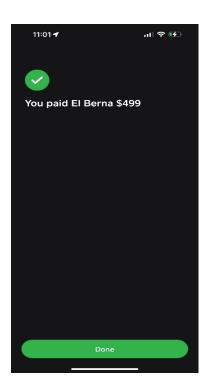


Figure 5 Figure 6 Figure 7

25. Law enforcement subsequently obtained financial records pursuant to various legal processes, which confirmed that the financial transactions discussed in Paragraph 24, above, were all sent from a Zelle account associated with ABDULKADIR.

Images sent from ABDULKADKIR to VILLALTA

26. Law enforcement also located a conversation between VILLALTA and Los that occurred over WhatsApp a few days later. In the WhatsApp conversation, VILLALTA requested to make a purchase from Los. Los sent back an image (*see* Figure 8, below), that depicted the items VILLALTA requested to purchase. Based on my training and experience, I know that these items, due to their size, shape, blue color, and general appearance, appear to be counterfeit M30 pills that contain fentanyl.



Figure 8: Image sent from Los to VILLALTA

- 27. VILLALTA and ORDONEZ exchanged a series of messages on March 16, 2024, during which they discussed obtaining a resupply of fentanyl pills from Los. VILLALTA stated that Los would set a good price if VILLALTA and ORDONEZ invested in "10," which, I believe, given the context of the conversation, is a reference to 10,000 fentanyl pills. The next day, VILLALTA and ORDONEZ exchanged a series of messages in which VILLALTA negotiated a narcotics re-supply with ORDONEZ from Los. VILLALTA wrote "66 for 10 pac." Based on my knowledge of the investigation, I understand that, in this conversation, VILLALTA informed ORDONEZ that the price per pill was set at \$0.66 cents per pill for 10,000 pills.
- 28. Subsequently, in March 2024, VILLALTA and FUNES both traveled to Los Angeles, California, to obtain fentanyl pills ORDONEZ had arranged to purchase from Los. As

described in more detail in Paragraph 33, below, ABDULKADIR and ORDONEZ later discussed the pills that VILLALTA and FUNES obtained on this trip. Flight records show that VILLALTA flew from Dulles International Airport to Los Angeles, California on March 15, 2024. On March 21, 2024, VILLATA sent FUNES a series of messages telling FUNES that VILLALTA had purchased FUNES a flight to Los Angeles, California. VILLALTA further stated that the cost of FUNES's flight would be taken off the cost of the pills they would purchase from Los. Flight records show that, on March 22, 2024, FUNES also flew from Dulles International Airport to Los Angeles, California.

- 29. Based on chats, investigators know that, while in Los Angeles, California, VILLALTA and FUNES met with Los to obtain fentanyl pills. Law enforcement also located postal data associated with SUBJECT PARCEL 5, which was sent via USPS. SUBJECT PARCEL 5 was shipped on March 25, 2024 from Los Angeles, California and delivered on March 26, 2024 to an address on Blundell Road in Falls Church, Virginia, within the Eastern District of Virginia. This Blundell Road address is the residence of an unindicted co-conspirator ("UCC-2").
- 30. I located multiple conversations in which the co-conspirators discussed SUBJECT PARCEL 5. For example, in FUNES's phone, I located a conversation that occurred between March 26, 2024 and April 6, 2024. In this conversation, it appears that UCC-2 was unaware that the parcel was being sent to his house. UCC-2 claimed that his mother received the parcel and disposed of its contents. FUNES later stated that "daS 10 racks nigha" ... "u think ima just sit here and let 10 racks go ina air?" I understand that, in this message, FUNES referred to a quantity of 10,000 fentanyl pills in the parcel sent to UCC-2's house.
- 31. Flight records show that FUNES departed Los Angeles, California, and returned to Dulles International Airport on March 25, 2024. In turn, VILLALTA departed Los Angeles,

California, and returned to Dulles International Airport on April 2, 2024. On April 5, 2024, a few days after his return, VILLALTA was arrested by the USSS in possession of more than 1,000 counterfeit pills containing fentanyl, as described in Paragraph 11, above. These pills were submitted to the Montgomery County Police Crime Laboratory for chemical analysis. The laboratory results confirmed that the pills contained fentanyl, and had an approximate weight of 116 grams.

## i. Conversations Recorded on the Arlington County Detention Center's Inmate Phone System

- 32. Beginning on March 20, 2024, prior to his arrest on federal charges, ORDONEZ was incarcerated at the Arlington County Detention Center in Arlington, Virginia on state charges. While incarcerated in Arlington County, ORDONEZ made multiple calls on the recorded jail phone line to his co-conspirators, including ABDULKADIR. ORDONEZ and others often used coded language in the recorded jail calls. My interpretations of this coded language included below are based on my training, experience and knowledge of the investigation to date.
- 33. In some of the recorded jail calls, ORDONEZ discussed FUNES and VILLALTA's trip to Los Angeles, California. ORDONEZ used the coded term "shoes" to refer to a quantity of 1,000 fentanyl pills. For example, on March 27, 2024, ORDONEZ spoke with an unindicated coconspirator ("UCC-3"). UCC-3 subsequently added ABDULKADIR to the call. ABDULKADIR told ORDONEZ that ABDULKADIR tried to figure out a "situation" and "that other thing" in order to get money to ORDONEZ. ABDULKADIR's use of vague terms seems to be an attempt to avoid naming something outright. ABDULKADIR and ORDONEZ then discussed the fact that VILLALTA and FUNES were "beefing" (i.e., arguing) regarding their trip to California. ORDONEZ then asked ABDULKADIR if "the shoes never came?" ABDULKADIR responded that they came, but that someone threw them away. ABDULKADIR and ORDONEZ continued to

discuss VILLALTA and FUNES, and whose fault it was that the parcel was lost. Based on the context and date of this conversation, I understand this conversation to concern SUBJECT PARCEL 5. ORDONEZ then stated to ABDULKADIR: "I feel like were the only two fucking dudes in the group that have a fucking brain, Younis." From this remark, I understand that ORDONEZ considered ABDULKADIR to be a member of the same drug trafficking organization.

- 34. On April 4, 2024, ORDONEZ spoke with UCC-3 and instructed UCC-3 to add VILLALTA to the call. During the conversation on the recorded jail line, the co-conspirators discussed their concerns about money and missing parcels. VILLALTA told ORDONEZ that VILLALTA requested a refund. ORDONEZ responded that ORDONEZ did not want a refund, but rather wanted the contents of the parcel. Based on the context and date of this conversation, this appears to be a reference to a refund or replacement of the contents of SUBJECT PARCEL 5, which were thrown away by UCC-2's mother. VILLALTA then asked ORDONEZ why ORDONEZ gave ABDULKADIR the same address to use. ORDONEZ said that he did not give the same address, but that if "he" (seemingly referring to Los) "keeps stalling" on ABDULKADIR's shipment, Los should instead just send ORDONEZ's shipment. Based on the context of this conversation, it appears that ABDULKADIR instructed Los to send parcels to the same address that VILLALTA instructed Los to send packages to, but that Los delayed the shipment to ABDULKADIR. ORDONEZ stated that he wanted his own parcel shipped immediately.
- 35. On April 17, 2024, ORDONEZ called FUNES, and told FUNES that ORDONEZ had "shoes" coming, and offered FUNES "size 15 shoes." FUNES laughed and declined; ORDONEZ then offered FUNES "size 13." Based on the investigation to date, I understand that, in this conversation, ORDONEZ offered to sell FUNES 1,000 fentanyl pills, first for a price of

\$1,500, and then, when FUNES refused, for a price of \$1,300. This conversation coincides with the date of delivery of SUBJECT PARCEL 8.

- 36. On April 18, 2024, ORDONEZ spoke to UCC-3 and instructed UCC-3 to add VILLALTA to the call. VILLALTA told ORDONEZ that he (VILLALTA) was with "Jo" (FUNES) and "Younis" (ABDULKADIR). VILLALTA and ORDONEZ then discussed that Los would send ABDULKADIR's parcel on "Monday or Tuesday." They also discussed obtaining additional "shoes" from Los. VILLALTA stated that the items would be sent to "Younis's joint," and that ABDULKADIR would wait outside for the parcel to be delivered.
- 37. Law enforcement subsequently located postal records related to SUBJECT PARCEL 9. This parcel was sent on April 22, 2024 from Los Angeles, California and arrived on April 23, 2024 at an address in Oxon Hill, Maryland. April 22 was the following Monday after April 18; this aligns with VILLALTA's statement on April 18 that ABDULKADIR's parcel would be sent on "Monday or Tuesday." SUBJECT PARCEL 4 and SUBJECT PARCEL 6 were also sent to the same address in Oxon Hill, Maryland.
- 38. Also on April 22, 2024, ORDONEZ spoke to UCC-3 on the recorded jail line. UCC-3 asked ORDONEZ where the "jams" were. I know that "jams" is a common term used by the co-conspirators to describe counterfeit pills containing fentanyl. ORDONEZ told UCC-3 to ask ABDULKADIR. Based on the date and context of this conversation, this appears to be another reference to SUBJECT PARCEL 9.

#### E. <u>Images of ABDULKADIR</u>

39. Within ORDONEZ's cellphone that was seized in 2024, law enforcement located numerous photographs of ABDULKADIR. Two such examples are included below.

40. First, in Figure 9, below, ABDULKADIR is seen on the left side of the photograph wearing sunglasses and a hoodie. In the image, ABDULKADIR displays U.S. Currency fanned out in his hands. ABDULKADIR also has a firearm in his waistband. ORDONEZ is seen on the right side of the photograph wearing a white t-shirt. ORDONEZ holds a firearm, which is pointed at the camera.



Figure 9: Photograph of ABDULKADIR (left) and ORDONEZ (right)

41. Second, in Figure 10, below, ABDULKADIR is seen sitting on a couch. Also depicted is a large quantity of U.S. Currency, which is fanned out on the table in front of ABDULKADIR.



Figure 10: Photograph of ABDULKADIR

**CONCLUSION** 

42. Based on my training and experience and my participation in this investigation, I

know that individual fentanyl pills typically weigh about 0.1 gram. Based on the quantities of

fentanyl pills discussed in the messages highlighted above, as well as the pills seized by law

enforcement, there is probable cause to believe that ABDULKADIR conspired with ORDONEZ,

VILLALTA, FUNES and others to distribute more than 400 grams of fentanyl.

43. Based on the facts set forth above, I respectfully submit that there is probable cause

to believe that ABDULKADIR conspired to distribute 400 grams or more of a mixture or

substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]

propanamide, known as fentanyl, a Schedule II controlled substance, in violation of 21 U.S.C. §§

841 and 846.

Respectfully submitted,

Patrick Maxwell

Task Force Officer

Drug Enforcement Administration

atrick Maxwell

Subscribed and sworn to in accordance with Fed. R.

Crim. P. 4.1 by telephone on January 13, 2025.

Digitally signed by Ivan Davis
Date: 2025.01.13 13:33:12 -05'00'

The Honorable Ivan D. Davis

United States Magistrate Judge

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