

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF CALIFORNIA

3  
4 ) Case No. **21-MJ-4726**  
5 **UNITED STATES OF AMERICA,** )  
6 **Plaintiff,** ) COMPLAINT FOR VIOLATION OF:  
7 **vs.** ) Title 21, U.S.C. §§ 841(a)(1) and  
8 ) 841(b)(1)(C) – Distribution of Fentanyl  
9 **COLE THOMAS SALAZAR (1),** ) Resulting in Death (Felony); Title 21,  
10 **VALERIE LYNN ADDISON (2),** ) U.S.C. §§ 841(a)(1) and 841(b)(1)(C) –  
11 **Defendants.** ) Possession with Intent to Distribute  
12 ) Fentanyl (Felony), Title 18, U.S.C.,  
13 ) Sec. 2 – Aiding and Abetting; Title 21,  
14 ) U.S.C. §§ 841(a)(1) and 841(b)(1)(C) –  
15 ) Possession with Intent to Distribute  
16 ) Heroin (Felony), Title 18, U.S.C., Sec.  
17 ) 2 – Aiding and Abetting; ; Title 21,  
18 ) U.S.C. §§ 841(a)(1) and 841(b)(1)(C) –  
19 ) Possession with Intent to Distribute  
20 ) Methamphetamine (Felony), Title 18,  
21 ) U.S.C., Sec. 2 – Aiding and Abetting;  
22 ) Title 21, U.S.C. §§ 841(a)(1) and 846 –  
23 ) Conspiracy to Distribute Fentanyl  
24 ) (Felony)

25 The undersigned complainant being duly sworn states:

26 **COUNT ONE**

27 On or about November 3, 2020, within the Southern District of California,  
defendant COLE THOMAS SALAZAR did knowingly and intentionally distribute  
a quantity of a mixture and substance containing a detectable amount of N-Phenyl-  
N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as fentanyl), a  
Schedule II Controlled Substance, which resulted in the death of another person, to

1 wit, S.E.F.; in violation of Title 21, United States Code, Sections 841(a)(1) and  
2 841(b)(1)(C).

3  
4 **COUNT TWO**

5 On or about January 13, 2021, within the Southern District of California,  
6 defendants COLE THOMAS SALAZAR and VALERIE LYNN ADDISON did  
7 knowingly and intentionally possess, with the intent to distribute, a mixture or  
8 substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-  
9 piperidinyl] propanamide (commonly known as fentanyl), a Schedule II Controlled  
10 Substance; in violation of Title 21, United States Code, Section 841(a)(1) and  
11 841(b)(1)(C), and Title 18, United States Code, Section 2.

12 **COUNT THREE**

13 On or about January 13, 2021, within the Southern District of California,  
14 defendants COLE THOMAS SALAZAR and VALERIE LYNN ADDISON did  
15 knowingly and intentionally possess, with the intent to distribute, a mixture or  
16 substance containing a detectable amount of heroin, a Schedule I Controlled  
17 Substance in violation of Title 21, United States Code, Section 841(a)(1) and  
18 841(b)(1)(C), and Title 18, United States Code, Section 2.

19 **COUNT FOUR**

20 On or about January 13, 2021, within the Southern District of California,  
21 defendants COLE THOMAS SALAZAR and VALERIE LYNN ADDISON did  
22 knowingly and intentionally possess, with the intent to distribute, 50 grams and  
23 more, to wit: approximately 60 grams of methamphetamine (actual), a Schedule I  
24 Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1)  
25 and 841(b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT FIVE**

1  
2 Beginning on a date unknown and ending on or about January 13, 2021, within  
3 the Southern District of California, defendants COLE THOMAS SALAZAR and  
4 VALERIE LYNN ADDISON did knowingly and intentionally conspire together and  
5 with each other and with other persons known and unknown to distribute a quantity  
6 of a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-  
7 phenylethyl)-4-piperidinyl] propanamide (commonly known as fentanyl), a  
8 Schedule II Controlled Substance; in violation of Title 21, United States Code,  
9 Section 841(a)(1) and 846.

10  
11 And the complainant states that this complaint is based on the attached  
12 Probable Cause Statement, which is incorporated herein by reference.

13 

14 \_\_\_\_\_  
15 Lisa Amman  
16 Task Force Officer  
17 Drug Enforcement Administration

18 Attested to by the applicant in accordance with the requirements of Fed. R. Crim.  
19 P. 4.1 by telephone on this 13th day of December, 2021.

20 

21 \_\_\_\_\_  
22 HONORABLE BARBARA L. MAJOR  
23 UNITED STATES MAGISTRATE JUDGE  
24  
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26  
27

**PROBABLE CAUSE STATEMENT**

1  
2 I, Task Force Officer (TFO) Lisa Amman, of the Drug Enforcement  
3 Administration (DEA), declare under penalty of perjury that the following is true and  
4 correct to the best of my knowledge and belief.

5 During the course of my duties, I have learned the following information from  
6 my personal participation in this investigation and having read the reports prepared by  
7 other law enforcement officers. The following does not contain all of the information  
8 known to myself or other federal agents and state and local officers regarding this  
9 investigation, but does contain those facts believed to be necessary to establish  
10 requisite probable cause.

11 On November 7, 2020, at approximately 1:45 p.m., San Diego County  
12 Sheriff's Department (SDSD) Deputies responded to a report of an unresponsive  
13 female inside of her apartment in Vista, California. Deputies arrived at the residence  
14 and a few minutes later pronounced S.E.F. (a twenty-four year old woman) deceased.  
15 Deputies interviewed the reporting party who stated he was S.E.F.'s neighbor and  
16 that he last saw S.E.F. on November 3, 2020. The reporting party was contacted by  
17 S.E.F.'s father on November 7, 2020, who asked the reporting party to check on  
18 S.E.F., which resulted in the reporting party discovering S.E.F. unresponsive in her  
19 bed and calling 9-1-1.

20 In the apartment, SDSD Deputies found an assortment of prescribed  
21 medications, numerous alcohol containers, a bong, burnt foil, and two small clear  
22 plastic baggies with nothing inside of them. The burnt foil and a baggie  
23 presumptively tested positive for the presence of fentanyl. The San Diego County  
24 Medical Examiner's Office (MEO) conducted their own investigation and performed  
25 an autopsy on November 8, 2020. The MEO determined S.E.F. died as the result of  
26 the toxic effects of fentanyl and alprazolam.

1 Drug Enforcement Administration (DEA) San Diego Field Division (SDFD),  
2 San Diego County Integrated Narcotics Task Force (NTF) Team 10 began an  
3 investigation into the death of S.E.F. to determine from whom S.E.F. procured the  
4 fatal dose of drugs. Based on a review of S.E.F.'s cellular phone, investigators  
5 learned that S.E.F. initially communicated with SALAZAR in early August 2020 via  
6 the "LetGo" app, now owned by "OfferUp." S.E.F. communicated by email with  
7 "[REDACTED]@gmail.com" (believed to be utilized by SALAZAR) using subject  
8 line "Roofing Tar." Drug dealers often use coded language, such as "roofing tar"  
9 meaning black tar heroin, in an attempt to avoid scrutiny by law enforcement.

10 Team 10 investigators obtained a forensic download of S.E.F.'s cell phone. In  
11 reviewing S.E.F.'s phone download, Team 10 investigators reviewed subsequent  
12 text communications between S.E.F. and SALAZAR. SALAZAR was using  
13 "TextNow" for his phone service with a telephone number ending in digits 0463  
14 from at least October 5, 2020 through November 3, 2020. Based on the continuing  
15 messages between S.E.F. and SALAZAR, it appears as though SALAZAR was  
16 supplying fentanyl and/or heroin to S.E.F. throughout that time period, until the final  
17 transaction between them on November 3, 2020, which resulted in S.E.F.'s death.

18 In particular, S.E.F. last communicated with SALAZAR on November 3,  
19 2020 by text message. During a series of messages on November 3, 2020,  
20 SALAZAR asked S.E.F. if she knew anyone with money because he had "real blue  
21 roxi 30s." "Roxi 30s," also known as Roxycodone 30 mg tablets, or oxycodone 30  
22 mg tablets, are commonly abused Schedule II opioid pharmaceutical pills, and  
23 counterfeits of these pills often contain fentanyl instead of oxycodone and are  
24 referred to as "blues," "Roxies," "M30s," etc. Later in the conversation, S.E.F.  
25 indicated to SALAZAR that she was dope-sick and needed drugs. SALAZAR asked  
26 S.E.F., "u are talking the tickets to Fenway park the Fairy dust." S.E.F. replied, "Yes  
27

1 I'd much prefer Fenway park But I'm desperate so." Investigators believe that  
2 "Fenway park" and "fairy dust" are references to fentanyl powder. S.E.F. and  
3 SALAZAR discussed a location to meet in the Rancho Bernardo neighborhood of  
4 San Diego. SALAZAR followed up by sending two "selfie" photographs of himself  
5 to S.E.F.

6 That same day, S.E.F. continued to send text messages to SALAZAR and  
7 confirmed they were meeting up at a parking lot in Rancho Bernardo. At  
8 approximately 10:55 a.m., S.E.F. messaged SALAZAR, "You there?" At  
9 approximately 11:11 a.m., S.E.F. messaged SALAZAR, "If u ever free and in north  
10 county come thru and kick it with me at my place." Based on these messages,  
11 investigators believe that SALAZAR and S.E.F. met on November 3, 2020 between  
12 10:55 a.m. and 11:11 a.m. to consummate the drug transaction. S.E.F. sent her last  
13 message to SALAZAR at 11:27 a.m.

14 On January 10, 2021, an investigator acting in an undercover (UC) capacity  
15 and utilizing the decedent's (S.E.F.) cell phone, sent a text message to SALAZAR  
16 requesting "tickets to Fenway." Over the next two days, the UC and SALAZAR  
17 exchanged text messages about meeting for the UC to purchase fentanyl and heroin  
18 from SALAZAR.

19 On January 13, 2021, the UC messaged SALAZAR asking if he was available  
20 and had the "confetti," a common slang term for fentanyl. SALAZAR responded  
21 "Yes," and requested the UC meet him downtown to purchase the drugs. The UC  
22 messaged SALAZAR that she parked her car. Law enforcement observed  
23 SALAZAR walking on foot with a female (later identified as Valerie Lynn  
24 ADDISON) towards the UC's vehicle. As SALAZAR and ADDISON approached,  
25 law enforcement contacted them. SALAZAR confirmed his identity to law  
26 enforcement. A search of SALAZAR's person produced approximately 2.6 net  
27

1 grams of black tar heroin, a black substance containing approximately .48 grams of  
2 heroin, and a white powdery substance containing approximately .29 grams of  
3 fentanyl.

4 ADDISON told investigators that she was SALAZAR's girlfriend, and that  
5 they were walking so that SALAZAR could sell drugs. ADDISON explained that  
6 they were staying in a hotel in her name because SALAZAR had a warrant.  
7 ADDISON told investigators that she was to receive the proceeds from SALAZAR's  
8 drug transaction. ADDISON gave law enforcement verbal and written consent to  
9 search the hotel room.

10 Investigators performed a consensual search of the hotel room. Inside the  
11 hotel room investigators found numerous controlled substances, including the  
12 following:

- 13 • Three large baggies of crystalline substance, containing approximately  
14 60 grams of methamphetamine (actual), located in the top drawer of a  
15 night stand on the left side of the bed next to used foils and two digital  
16 scales;
- 17 • One small chunk of a white powdery substance, which presumptively  
18 tested positive for fentanyl, on top of a functional digital scale located  
19 in the top drawer of a night stand on the left side of the bed;
- 20 • A white powdery substance inside a piece of aluminum foil packaged  
21 within a folded white piece of paper on the TV stand, containing  
22 approximately 0.9 grams of cocaine hydrochloride; and
- 23 • "Pay Owe" labels and price list for drugs.

24 Items in both SALAZAR and ADDISON's names, along with male and  
25 female type clothing were found within the room.

1 During a post-Miranda interview, ADDISON admitted she was renting the  
2 room at the hotel in her name because SALAZAR had an active felony warrant.  
3 ADDISON said SALAZAR was going to sell the drugs he was in possession of to a  
4 female friend. ADDISON said SALAZAR was supposed to give her the money from  
5 the drug sales, and she was going to deposit the money into her bank account and  
6 use the money to continue renting the hotel room.

7 ADDISON said she met SALAZAR a few years ago and he was her drug  
8 dealer. ADDISON said she and SALAZAR have been in a dating relationship for a  
9 few months.

10 As a result of the foregoing, ADDISON and SALAZAR were booked into the  
11 custody of the San Diego County Sheriff's Department.

12 At the time of arrest, SALAZAR had a purple Galaxy S9+ cell phone in his  
13 hand. ADDISON claimed it was her phone that she allowed SALAZAR to use for  
14 the past three days. The "TextNow" app on the phone showed the associated phone  
15 number ending in digits 0463, which is the phone number the UC used to  
16 communicate with SALAZAR, and the number S.E.F. contacted to purchase drugs  
17 before her death. Over 15 messages on the phone related to the coordination with  
18 customers to sell drugs to them.

19 Investigators found numerous photographs of evidentiary value saved in this  
20 phone including the following: a photograph of a "Ziploc" style baggie containing a  
21 white powdery substance; photographs of foil with burnt residue and photographs of  
22 pills; photographs of ADDISON and SALAZAR together; screenshots of text  
23 messages regarding drug sales and directing the buyer to send payment through  
24 Venmo; and a photograph of a receipt from a hotel in ADDISON's name for two  
25 guests for the night of October 28, 2020.



1 During a post-Miranda interview with SALAZAR, SALAZAR said the drugs  
2 in the hotel room belonged to him. SALAZAR said ADDISON was renting the  
3 room, and they were both staying in the room. SALAZAR stated he had been using  
4 the purple Samsung Galaxy S9+ cell phone found in his possession for weeks.  
5 SALAZAR said he was walking to sell drugs to his friend when he was contacted  
6 and arrested by police. In regards to the investigation of the death of S.E.F.,  
7 SALAZAR denied selling S.E.F. fentanyl.

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**FILED**

Dec 21 2021

3:57 pm

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY s/ AmyC DEPUTY

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6 UNITED STATES DISTRICT COURT  
7 SOUTHERN DISTRICT OF CALIFORNIA

8 July 2021 Grand Jury

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 COLE THOMAS SALAZAR (1),  
13 VALERIE LYNN ADDISON (2),

14 Defendants.

Case No. '21 CR3518 CAB

I N D I C T M E N T

Title 21, U.S.C., Secs. 841(a)(1) and 841(b)(1)(C) - Distribution of Fentanyl Resulting in Death;  
Title 21, U.S.C., Secs. 841(a)(1) and 841(b)(1)(C) - Possession with Intent to Distribute Fentanyl, Heroin, and Methamphetamine;  
Title 18, U.S.C., Sec. 2 - Aiding and Abetting; Title 21, U.S.C., Secs. 841(a)(1) and 846 - Conspiracy to Distribute Fentanyl;  
Title 21, U.S.C., Sec. 853 - Criminal Forfeiture

15  
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19 The grand jury charges:

20 Count 1

21 On or about November 3, 2020, within the Southern District of  
22 California, defendant COLE THOMAS SALAZAR did knowingly and  
23 intentionally distribute a quantity of a mixture and substance  
24 containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-  
25 piperidinyl] propanamide (commonly known as fentanyl), a Schedule II  
26 Controlled Substance, which resulted in the death of another person, to  
27 wit, S.E.F.; in violation of Title 21, United States Code,  
28 Sections 841(a)(1) and 841(b)(1)(C).

ADGO:nlv:San Diego:12/21/21

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Count 2

On or about January 13, 2021, within the Southern District of California, defendants COLE THOMAS SALAZAR and VALERIE LYNN ADDISON did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as fentanyl), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

Count 3

On or about January 13, 2021, within the Southern District of California, defendants COLE THOMAS SALAZAR and VALERIE LYNN ADDISON did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

Count 4

On or about January 13, 2021, within the Southern District of California, defendants COLE THOMAS SALAZAR and VALERIE LYNN ADDISON did knowingly and intentionally possess with the intent to distribute 50 grams and more, to wit: approximately 60 grams of methamphetamine (actual), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

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Count 5

1  
2 Beginning on a date unknown to the grand jury and ending on or  
3 about January 13, 2021, within the Southern District of California,  
4 defendants COLE THOMAS SALAZAR and VALERIE LYNN ADDISON did knowingly  
5 and intentionally conspire together and with each other and with other  
6 persons known and unknown to the grand jury to distribute a quantity of  
7 a mixture and substance containing a detectable amount of N-Phenyl-N-  
8 [1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as  
9 fentanyl), a Schedule II Controlled Substance,; in violation of  
10 Title 21, United States Code, Sections 841(a)(1) and 846.

FORFEITURE ALLEGATIONS

11  
12 1. The allegations contained in Counts 1 through 5 are realleged  
13 and by their reference fully incorporated herein for the purpose of  
14 alleging forfeiture to the United States of America pursuant to the  
15 provisions of Title 21, United States Code, Section 853. The property  
16 to be forfeited includes, but is not limited to, a purple Samsung Galaxy  
17 s9+, Model SM-G965U (IMEI 54640090646782).

18 2. Upon conviction of one and more of the felony offenses alleged  
19 in Counts 1 through 5 of this Indictment, said violations being  
20 punishable by imprisonment for more than one year and pursuant to  
21 Title 21, United States Code, Sections 853(a)(1) and 853(a)(2),  
22 defendants COLE THOMAS SALAZAR and VALERIE LYNN ADDISON shall forfeit  
23 to the United States all rights, title and interest in any and all  
24 property constituting, or derived from, any proceeds the defendants  
25 obtained, directly and indirectly, as the result of the offenses, and  
26 any and all property used or intended to be used in any manner or part  
27 to commit and to facilitate the commission of the violations alleged in  
28 this Indictment.

1 3. If any of the above-described forfeitable property, as a  
2 result of any act or omission of the defendants:

3 a. cannot be located upon the exercise of due diligence;

4 b. has been transferred or sold to, or deposited with, a  
5 third party;

6 c. has been placed beyond the jurisdiction of the Court;

7 d. has been substantially diminished in value; or

8 e. has been commingled with other property which cannot be  
9 subdivided without difficulty; it is the intent of the United States,

10 pursuant to Title 21, United States Code, Section 853(p), to seek  
11 forfeiture of any other property of the defendants up to the value of  
12 the property listed above as being subject to forfeiture.

13 All pursuant to Title 21, United States Code, Section 853.

14 DATED: December 21, 2021.

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18 RANDY S. GROSSMAN  
19 Acting United States Attorney

20 By:   
21 ADAM GORDON  
22 Assistant U.S. Attorney  
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