

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

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:23-mj-24
)	
VERONICA DITTMAN,)	<u>UNDER SEAL</u>
)	
)	
Defendant.)	

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

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

INTRODUCTION

1. This affidavit is submitted in support of a criminal complaint and arrest warrant charging that on or between January 2022 and August 2022, within the Eastern District of Virginia and elsewhere, the defendant, VERONICA DITTMAN (hereinafter referred to as “DITTMAN”), did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with others, known and unknown, to unlawfully, knowingly, and intentionally distribute controlled substances, including methamphetamine, a Schedule II controlled substance, and a mixture and substance containing fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 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 I have been assigned to this squad since June 2021. Prior to being hired as a Special Agent with the FBI, I was a Deputy Sheriff 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 forensic evidence collection. I have experience investigating various types of crime, and I have investigated or assisted in the investigation of several 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. The facts and information contained in this affidavit are based upon my training and experience, participation in this and other investigations, personal knowledge, and observations during the course of this investigation, as well as the observations of other individuals involved in this investigation. All observations not personally made by me were relayed to me by the individuals who made them or were conveyed to me through my review of the records, documents, and other physical evidence obtained during the course of the investigation. This affidavit is meant to convey information necessary to support probable cause for the requested complaint and arrest warrant and is not intended to include each and every fact observed by me or known to the government. The inferences and conclusions I draw from the evidence included in this affidavit are what I believe based on my training, experience, and knowledge of the investigation.

FACTS SUPPORTING PROBABLE CAUSE

I. Background of the Investigation

4. The United States, including the FBI, the Food and Drug Administration – Office of Criminal Investigations (FDA-OCI), and the U.S. Postal Inspection Service ("USPIS"), is conducting a criminal investigation of a darknet market ("DM") vendor that operates using several different monikers including, but not limited to, TrustedTraphouse, TrustableTraphouse,

TrusteeTrap, and PopcornPlug. Since February of 2022, the FBI has been conducting controlled purchases of narcotics from this vendor.

5. A DM is a 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, selling or brokering transactions involving legal products as well as drugs, weapons, counterfeit currency, stolen credit card details, forged documents, unlicensed pharmaceuticals, steroids, and other illicit goods.

6. Individuals typically purchase narcotics through DMs from “vendors,” who accept digital currency such as Bitcoin¹ 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 clear web site. If a moniker on a particular marketplace has not already been registered by another user, vendors and customers can use the same moniker across multiple marketplaces. Based on customer reviews, vendors can become well known as “trusted” vendors.

7. Since February 2022, the FBI has reviewed the vendor profile for monikers TrustedTraphouse, TrustedTrapper, TrustedTrap, TrustableTraphouse, TrusteeTrap, GoldenTrails, and PopcornPlug and others across several DMs to include ARES, ASAP, Bohemia,

¹ 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 in a public ledger called a blockchain. Based on my training and experience, individuals who are involved in criminal activity over the darkweb often purchase items in Bitcoin to conceal the true nature of the funds from law enforcement.

Dark0de, darkfox, Incognito, Kerberos, Kingdom, Nemesis, Royal Market, Tor2Door, ToRReZ, Versus, and World Market.

8. Across these markets, vendor pages for these monikers claimed to be the same vendor, often through explicit reference to corresponding vendor pages on other markets. In addition, some had matching PGP2 keys, while others had different PGP keys, but used the same introduction on their vendor page, and signed with the trademark “-TTH” or “-TT.” On all DMs, the vendor advertised for sale Oxycodone pills in quantities ranging from 10 to 5,000 pills. The vendors also advertised sale crystal methamphetamine in quantities ranging from 3.5 grams to 4 ounces, as well as heroin and cocaine, among other things.

9. Within the product description for the Oxycodone on the DM Dark0de, the pills were described as follows: “These are Not normal OxyCodone 30 mg. These are Much stronger than pharmaceutical OxyCodone These were NOT made by a pharmacy. These are the ones that taste like popcorn. They slide on foil perfectly. Golden trails. Be careful. Price is per pill. These are pressed Oxy 30s that everyone’s been falling head over heels for. We focus on quality over quantity. We believe you get what you pay for, and if you’re trying to save a few bucks on something you consume, that literally alters your state of mind, you’re shopping at the wrong store.”

² PGP is used on darknet markets to encrypt communications between vendors and customers. When a customer orders from a vendor or sends a vendor a message on a darknet market, that information may be stored in the marketplace’s database. Given concerns that the marketplace 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 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.

10. Based on my training and experience, “pressed” indicates counterfeit pills. Counterfeit pills are fake medications that have different ingredients than the actual medication. They may contain no active ingredient, the wrong active ingredient, or have the right ingredient but in an incorrect quantity. Counterfeit pills may contain lethal amounts of fentanyl and are extremely dangerous because they often appear identical to legitimate prescription pills, and the user is likely unaware of how lethal they can be.

11. On or about February 2, 2022, an FBI employee operating in an undercover capacity (herein after referred to as “UC”) accessed Dark0de Reborn Market and ordered 10 pills of counterfeit Oxycodone from Trustedtraphouse for \$65, plus shipping costs and a transaction fee. The pills were advertised as “pressed m30 oxycodone x10 new.” The UC made the purchase through the DM and provided an address within the Eastern District of Virginia where TrustedTraphouse could send the pills. UC paid for the pills with Bitcoin. On February 9, 2022, law enforcement retrieved a U.S. Postal Service (USPS) Priority Mail envelope at the address designated by the UC. USPS records show that the package initially entered USPS custody in Peoria, Arizona. The envelope contained a manila envelope and, within that, a white envelope. Within the white envelope was a small baggie with 10 blue pills. The pills were debossed with an “M” enclosed in a square on one side, and half-scored with “30” debossed above the score on the other side. Pharmaceutical grade Oxycodone pills are debossed with “M” on one side and “30” on the other; the “M” indicates the manufacturer, Mallinckrodt pharmaceuticals, and the “30” indicates 30 milligrams. Proper chain of custody was maintained on the pills until they were analyzed by the DEA Mid-Atlantic Laboratory, where they tested positive for fentanyl with a weight of 1.102 grams.

