

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 16-60206-CR-HURLEY**

UNITED STATES OF AMERICA

vs.

CHRISSANO S. LESLIE,
a/k/a, "OWLCITY,"

Defendant.

FACTUAL PROFFER

If this matter were to proceed to trial, the Government would prove the stated facts beyond a reasonable doubt.

Undercover Investigation of LESLIE a/k/a "OWLCITY"

1. Since at least July of 2015, agents with the DEA have been investigating Chrissano S. LESLIE, known online as "OWLCITY," who appeared on several criminal Dark Web marketplaces. On several occasions, DEA agents made undercover online purchases of controlled substances from OWLCITY and received the purchased narcotics, to include fentanyl, heroin, and alpha-PVP, via U.S. Mail, shipped to undercover mailboxes. For instance:

a. On July 23, 2015, DEA agents purchased 2.5 grams of Alpha-PVP from "OWLCITY" on the Agora Marketplace for .1716 bitcoins; and,

b. On October 23, 2015, DEA agents purchased .4 grams of heroin from "OWLCITY" on the Abraxas Marketplace for .3606 bitcoins. In the product listing, "OWLCITY" stated: "Finally Ive [sic] gotten some very good dope which ive [sic] tested myself."

2. In both instances, the controlled substances were shipped via United States Priority Mail with South Florida return addresses.

3. On February 26, 2016, DEA agents received information from the U.S. Postal Service (USPS) that the tracking status of the Priority Mail package that OWLCITY sent to complete the October 23, 2015 heroin order was queried online on the U.S. Postal Service website from an IP address assigned by AT&T to an account associated with the LESLIE's Residence.

4. On or around March 3, 2016, DEA agents observed OWLCITY as a listed vendor on the Alhabay Market. OWLCITY's Alhabay user profile displayed "Positive feedback (last 12 months): 98%," and OWLCITY listed numerous controlled substances for sale, including: "Xanax Bars," "Methylone," "Modafinil Pills," "Cocaine," "Heroin," and "Furanyl-Fentanyl (UNCUT)."

5. On OWLCITY's Alhabay vendor profile, the DEA agents observed a listing that stated "1G China White Heroin Sample." Acting in an undercover capacity, the DEA agents placed an order for ten (10) grams of China White Heroin and made a bitcoin payment corresponding to approximately \$510.00.

6. The DEA agents instructed OWLCITY to ship the drugs, that same day, March 3, 2016, to an undercover mailbox, using U.S. Priority Mail. Subsequently, the DEA agents received a private message on Alhabay from OWLCITY confirming the order and stating that the package would be shipped by midday and to expect a tracking number within 24 hours.

7. Meanwhile, that same day, March 3, 2016, at approximately 9:00 AM, DEA agents and Miramar Police Department detectives established surveillance at the Leslie Residence, and a vehicle registered to LESLIE parked in the apartment complex parking lot.

8. Around approximately, 4:30 PM, surveillance agents observed LESLIE exit the Leslie Residence wearing a backpack, enter his vehicle and drive to a post office located in Hollywood, Florida. Around approximately 5:30 PM, agents observed LESLIE exit his vehicle wearing the same backpack and enter the post office. Agents then observed LESLIE retrieve five parcels from the backpack and hand them to the clerk at the counter. Agents observed LESLIE pay for the shipping, take his receipt, and exit the post office.

9. On the same date, a postal inspector entered the USPS post office located in Hollywood, Florida after LESLIE departed. The postal inspector located the five parcels LESLIE left at the post office. The parcels included a parcel addressed to the same name and address to which the undercover DEA agents instructed OWLCITY to ship the ordered heroin (hereinafter referred to as the "UC Parcel") and four additional parcels which resembled the UC Parcel in size, weight, location of origin and exterior appearance.

10. On March 10, 2016, agents opened the UC Parcel and executed a search warrant on the remaining four parcels. The UC Parcel contained white powdery substance suspected to be heroin. The remaining parcels all contained white powdery substances and/or pills.

11. Later laboratory analysis revealed that the UC Package in fact contained a 9.9 grams of a mixture of several controlled substances including Fentanyl, and that the remaining four packages included Alpha-PVP, Cocaine, MDMA, and Alprazolam (Xanax).

LESLIE Computer Repair Coincides with OWLCITY Inactivity

12. On July 12, 2016, DEA agents observed LESLIE drive from the Leslie Residence and to a shopping center and then exit his vehicle with a black laptop computer which he dropped off at a computer repair shop. Records revealed that LESLIE picked up the lap top on July 13, 2016.

13. On or around July 14, 2016 agents logged into a dark web marketplace on which OWLCITY was known to operate as a vendor and observed that OWLCITY had not been active since July 11, 2016, which corresponded to the time period during which LESLIE had left the laptop for repairs.

Search of Leslie Residence

14. On July 27, 2016, a search warrant was executed at the Leslie Residence. At the initiation of the search LESLIE ran to the bathroom within the residence in a failed attempt to flush what appeared to be controlled substances.

15. Pursuant to the search, DEA recovered pills and powders, which appear to be controlled substances, both in that bathroom and in a room identified as LESLIE's. DEA also recovered several computers and USPS packaging and shipping materials in LESLIE's bedroom, as well as at least one bitcoin cold storage wallet.

16. In addition, DEA recovered several computers and USB drives. At least one computer had TOR (a software used to connect to the dark web) installed, and at least one USB drive had an electronic log of online narcotics transactions and dark web marketplace usernames and passwords.


17. Regarding LESLIE's transaction log, it lists 1,004 transactions with the following aggregate amounts by category:

| | |
|-------------|-------------|
| "A-P pow" | 869.4 grams |
| "A-P Roc" | 418.5 grams |
| "A-PHP" | 88 grams |
| "A-PV" | 19 grams |
| "H" | 160.9 grams |
| "MD" | 115 grams |
| "Methylone" | 17 grams |
| Modafinil | 40 pills |
| Xanax | 1,078 pills |

18. Agents also discovered on the USB drive an Excel spreadsheet with 621 names, dates of birth, social security numbers, and IRS Tax pins, as well as, in some instances, driver's license numbers: the columns were labeled "Name," "D.O.B.," "S.S.," and "Pin." Several PII theft victims listed on the Excel spreadsheet were contacted and confirm that they did not authorize LESLIE to possess their means of identification, including victim J.J. whose means of identification is set forth in Count 5 of the indictment.

WIFREDO A. FERRER
UNITED STATES ATTORNEY

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FRANCISCO R. MADERAL
ASSISTANT UNITED STATES ATTORNEY

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ROBERT H. TRACHMAN
ATTORNEY FOR DEFENDANT

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CHRISSANO S. LESLIE
DEFENDANT