

Approved: Micah Fergenson
KAYLAN E. LASKY / MICAH F. FERGENSON
Assistant United States Attorneys

Before: HONORABLE ONA T. WANG
United States Magistrate Judge
Southern District of New York

21 MAG 10981

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UNITED STATES OF AMERICA

- v. -

CHRISTOPHER HARRIS,
a/k/a "Christopher Harris-
Edmundson,"

Defendant.

-----x
SOUTHERN DISTRICT OF NEW YORK, ss.:

:
: SEALED COMPLAINT

:
: Violation of 21 U.S.C.
: § 846

:
: COUNTY OF OFFENSE:
: NEW YORK

DAVID SCHWARTZ, being duly sworn, deposes and says that he is a Criminal Investigator-Inspector with the United States Postal Inspection Service ("USPIS"), and charges as follows:

COUNT ONE
(Narcotics Conspiracy)

1. From at least in or about November 2020 up to and including in or about November 2021, in the Southern District of New York and elsewhere, CHRISTOPHER HARRIS, a/k/a "Christopher Harris-Edmundson," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that CHRISTOPHER HARRIS, a/k/a "Christopher Harris-Edmundson," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that CHRISTOPHER HARRIS, a/k/a "Christopher Harris-Edmundson," the defendant, conspired to distribute and possess with intent to distribute was 50 grams and more of methamphetamine, its salts, isomers, and salts of

its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

The bases for my knowledge of the foregoing charge are, in part, as follows:

4. I am a Criminal Investigator-Inspector with USPIS, and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. Since in or about August 2021, USPIS, Homeland Security Investigations ("HSI"), and the New York City Police Department ("NYPD"), have been investigating individuals who have been conspiring to sell methamphetamine on a marketplace ("Marketplace-1") on the darkweb and mail those orders elsewhere, including to the New York City-area.¹ As described further below, CHRISTOPHER HARRIS, a/k/a "Christopher Harris-Edmundson," the defendant, is a member of the conspiracy.

Background

6. Based on my participation in this investigation, my communications with other law enforcement officers, and my review of court and law enforcement documents and records, I have learned, in substance and in part, that:

¹ Based on my training and experience and involvement in this investigation, I know that the "darkweb" or "darknet" are colloquial names for a number of extensive, sophisticated, and widely-used criminal marketplaces operating an encrypted overlay of the Internet, as well as the name for this encrypted space generally. These markets allow participants to buy and sell illegal items, such as drugs, firearms, and other hazardous materials, with greater anonymity than is possible on the traditional Internet. These online black-market websites use a variety of technologies to ensure that communications and transactions are shielded from interception and monitoring.

a. On or about August 16, 2019, CHRISTOPHER HARRIS, a/k/a "Christopher Harris-Edmundson," the defendant, was convicted of selling or providing for resale Schedule I or II narcotics, in in Fairfax County, Virginia, in connection with operating a darkweb vendor profile² (on a darkweb marketplace) called "GoodDopeUSA" that sold methamphetamine and heroin. HARRIS was sentenced principally to five years' probation.

August 12, 2021 Undercover Purchase and Identification of CHRISTOPHER HARRIS, a/k/a "Christopher Harris-Edmundson," the Defendant

7. Based on my participation in this investigation, my conversations with other law enforcement agents, and my review of screenshots from Marketplace-1, I have learned, in substance and in part, that:

a. On or about August 12, 2021, an undercover law enforcement officer placed an online order for approximately 28 grams of methamphetamine from the vendor "KeepTheDopeAlive" on Marketplace-1 ("UC Buy-1") for approximately \$462.50, including shipping costs, and requested that the narcotics be sent to a particular address in New York, New York ("UC Buyer Address-1"). Records visible on Marketplace-1 indicate that vendor "KeepTheDopeAlive" joined Marketplace-1 on or about November 4, 2020.

b. On or about August 12, 2021, a parcel ("Parcel-1") was shipped by United States Postal Service ("USPS") priority mail in a small flat rate box to UC Buyer Address-1 (the address the undercover officer provided). As a result, Parcel-1 was believed to contain the contents of UC Buy-1. The sender of Parcel-1 was listed as "Maddie Gyal Cosmetics" (the "Parcel-1 Sender") at a particular address in Torrance, California (the "Parcel-1 Sender Address"). Based on my review of records from commercially-available databases, I am aware that the Parcel-1 Sender is not associated with the Parcel-1 Sender Address.

² Based on my training and experience and my involvement in this investigation, I know that darkweb or darknet vendors are persons selling illicit products on darknet markets, similar in function (but not legality) to vendors who sell legitimate goods on e-commerce marketplaces. These darknet vendors will adopt online nicknames, or monikers, as well as other identifiers, to allow users to find their sales page, or profile, on a given darknet market.

c. When law enforcement officers opened Parcel-1 on or about August 20, 2021, they identified a bubble envelope, inside of which was a dark mylar bag. Inside the dark mylar bag was a clear baggy containing a white crystalline substance ("Suspected Narcotics-1"). Suspected Narcotics-1 field-tested positive for methamphetamine and had a gross weight of approximately 32.7 grams.

d. Suspected Narcotics-1 was tested by the DEA Northeast Regional Laboratory and was found to contain methamphetamine hydrochloride with a net weight of 31.4 grams and a purity of 98%.

8. Based on my participation in this investigation and my review of law enforcement documents and records, I have learned, in substance and in part, that:

a. After recovering Parcel-1, law enforcement personnel at the Homeland Security Investigations Forensic Laboratory processed Parcel-1 for latent fingerprints. They recovered a fingerprint (the "Fingerprint") from the adhesive side of the tape removed from Parcel-1.

b. The Fingerprint recovered by law enforcement from Parcel-1 matched a copy of the fingerprint of CHRISTOPHER HARRIS, a/k/a "Christopher Harris-Edmundson," the defendant, in a law enforcement database of fingerprint records.

November 4, 2021 Undercover Purchase

9. Based on my participation in this investigation, my conversations with other law enforcement agents, and my review of screenshots from Marketplace-1, I have learned, in substance and in part, that:

a. On or about November 4, 2021, an undercover law enforcement officer placed an online order for approximately 2 ounces of methamphetamine from vendor "KeepTheDopeAlive" on Marketplace-1 ("UC Buy-2") for approximately \$913.50, including shipping costs, and requested that the narcotics be sent to a particular address in New York, New York ("UC Buyer Address-2").

b. Also, on or about November 4, 2021, a parcel ("Parcel-2") was shipped by United States Postal Service ("USPS") priority mail in a small flat rate box to UC Buyer Address-2 (the address the undercover officer provided). As a result, Parcel-2 was believed to contain the contents of UC Buy-2. The sender of Parcel-2 was listed as "Starboy Collectables" (the "Parcel-2 Sender") at a particular address in Commerce, California (the

"Parcel-2 Sender Address"). Based on my review of records from commercially-available databases, I am aware that the Parcel-2 Sender is not associated with the Parcel-2 Sender Address.

c. When law enforcement officers opened Parcel-2 on or about November 10, 2021, they identified a bubble envelope, inside of which was a light-colored mylar bag with the word "supreme" on it. Inside the light-colored mylar bag was a clear baggy containing an off-white crystalline substance ("Suspected Narcotics-2"). Suspected Narcotics-2 field-tested positive for methamphetamine and had a gross weight of approximately 58.3 grams.

November 15, 2021 Surveillance

10. On or about November 15, 2021, I participated along with other law enforcement officers in physical surveillance of CHRISTOPHER HARRIS, a/k/a "Christopher Harris-Edmundson," the defendant. Based on my participation in that surveillance, my conversations with other law enforcement officers, and my review of photographs and videos related to that surveillance, I have learned the following.

a. In or around the afternoon of November 15, 2021, agents began conducting surveillance of a building in Los Angeles, California, where I believe HARRIS works and resides (the "Building"). Based on my review of USPS records, I have learned that HARRIS receives mail at an apartment (the "Apartment") in the Building. Similarly, based on my review of information from the California Department of Motor Vehicles, I have learned that HARRIS's California driver's license lists the Apartment as his address.

b. During the surveillance on November 15, 2021, HARRIS – who is recognizable from his driver's license photograph – was observed inside a store that holds itself out as a smoke shop (the "Smoke Shop") and that is located in the same Building as HARRIS's Apartment. Based on my review of information regarding businesses registered with the Los Angeles Office of Finance, I have learned that when the LLC associated with the Smoke Shop³ was registered with the Los Angeles Office of Finance, HARRIS's Apartment was listed as the LLC's mailing address. Based on the foregoing, including physical surveillance of HARRIS in the Smoke Shop as well as my review of public social media posts featuring

³ In records filed with the California Secretary of State, the LLC, which has a name related to smoking, provides its business address as that of the Smoke Shop.

HARRIS and the Smoke Shop, I believe that HARRIS owns, manages, or otherwise works in the Smoke Shop.

c. At approximately 3:35 p.m. on November 15, 2021, HARRIS exited the Smoke Shop carrying a bag that appeared to contain several white boxes consistent with USPS flat rate priority boxes. HARRIS proceeded to walk to a nearby UPS store and enter the store. An agent followed HARRIS inside, where HARRIS was observed applying clear tape, with bare hands, to the seams of numerous small flat rate priority boxes (the "November 15 Parcels") before placing the November 15 Parcels on a cart with a sign for USPS mail drops.⁴ HARRIS then exited the store and walked back to the Smoke Shop.

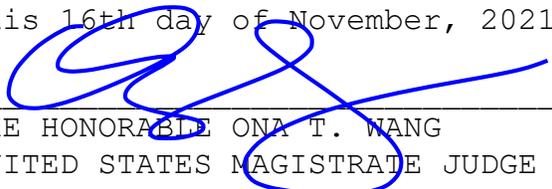
d. Based on my review of USPS records for the November 15 Parcels, I have learned that the November 15 Parcels consisted of sixteen USPS flat rate priority boxes. The sender for each of the sixteen November 15 Parcels was "Starboy Collectables" (i.e., the Parcel-2 Sender) at the same Commerce, California sender address used for Parcel-2 (i.e., the Parcel-2 Sender Address).

WHEREFORE, I respectfully request that a warrant be issued for the arrest of CHRISTOPHER HARRIS, a/k/a "Christopher Harris-Edmundson," the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

S/ David Schwartz/otw

DAVID SCHWARTZ
Criminal Investigator-Inspector
United States Postal Inspection Service

Sworn to me through the
transmission of this Affidavit
by reliable electronic means, pursuant to
Federal Rule of Criminal Procedure 4.1,
This 16th day of November, 2021



THE HONORABLE ONA T. WANG
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

⁴ I know from training and experience that certain UPS Stores allow customers to drop off packages for USPS pickup.