IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)		
v.)	Criminal No.	17-811m
HENRY KOFFIE a/k/a/ NarcoBoss)		

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Special Agent Eric J. Yingling, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

- 1. I am employed as a Special Agent of the Federal Bureau of Investigation (FBI), and have been so employed since July 2014. I am currently assigned to a complex financial crime and health care squad which includes an Opioid Task Force in the Pittsburgh Division of the FBI, and have been so assigned since December 2014. In this capacity, I am responsible for investigating possible violations of federal criminal law, including the manufacturing and distribution of furanyl fentanyl, which is a Schedule I controlled substance, in violation of 21 U.S.C. 841(a).
- 2. By virtue of my FBI employment, I perform and have performed a variety of investigative tasks, including functioning as a case agent on narcotics cases. I have received extensive training in general law enforcement and criminal investigations, including the manufacturing and distribution of controlled substances at the FBI Academy in Quantico, Virginia. Moreover, I have gained experience in conducting such investigations and in the drafting and the

execution of search and arrest warrants relating to manufacturing and distribution of controlled substances.

- 3. As a federal agent, I am authorized to investigate violations of laws of the United States and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.
- 4. The information contained in this affidavit is based upon my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals including other law enforcement personnel and others who have personal knowledge of the events and circumstances described herein, knowledge obtained from my review of documents, electronic records, and other evidence related to this investigation, and knowledge gained through my training and experience. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause.
- 5. This Affidavit is in support of an application for a criminal complaint against and an arrest warrant for HENRY KOFFIE, also known as "NarcoBoss." As set forth herein, there exists probable cause to believe that HENRY KOFFIE has violated Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

SUBJECT IDENTIFIERS

6. KOFFIE is a United States citizen who maintains a Pennsylvania Driver's License which lists his home address as "300 Berbro St, Darby, PA 19023." Public records indicate that KOFFIE also maintains a residence at 216 Walnut Street, Darby, PA 19023.

PROBABLE CAUSE

A. Overview

- 7. The United States Postal Inspection Service and the Federal Bureau of Investigation ("FBI") are investigating an online vendor named "NarcoBoss" who sells Fentanyl products on the Dark Net website AlphaBay.
- 8. Based on my training and experience, your Affiant knows that the Dark Net are websites that are not located in standard Internet lookup tables and are hidden often through anonymity networks like TOR (The Onion Router). Many of these websites contain a .onion extension. The Dark Net contains websites that are online marketplaces where vendors can sell goods to sellers. In many of these Dark Net marketplaces, the sellers sell products that are not legal to sell within the United States such as controlled substances like fentanyl and fentanyl analogues.
- 9. Your Affiant knows that AlphaBay is one such Dark Net marketplace. It is commonly used to facilitate purchases of controlled substances between buyers and vendors who operate 'stores' on AlphaBay.
- 10. NarcoBoss is a vendor on AlphaBay, which means he sells products on the Dark Net marketplace. Your Affiant has visited NarcoBoss's vendor page on AlphaBay. NarcoBoss sells a product that he calls "China White Synthetic Heroin Fentanyl Mix" at a price of \$40 per gram. As of June 30, 2017, the 'NarcoBoss' profile indicates the store has conducted 6,615 transactions involving controlled substances.

B. <u>Undercover purchases in the Western District of Pennsylvania</u>

11. Using an undercover AlphaBay account, law enforcement in the Western District of Pennsylvania made a number of undercover purchases of this "China White Synthetic Heroin

Fentanyl Mix" from NarcoBoss.

- 12. Specifically, one such undercover purchase occurred on May 11, 2017: On that date, law enforcement in the Western District of Pennsylvania used an undercover AlphaBay account to purchase 7 grams of "China white synthetic heroin fentanyl mix" from NarcoBoss's AlphaBay vendor account. Law enforcement provided "Mike Wilson" as the recipient name and provided an undercover address to receive this product.
- 13. Using an undercover AlphaBay account, law enforcement in the Western District of Pennsylvania made a number of undercover purchases of this "China White Synthetic Heroin Fentanyl Mix" from NarcoBoss.
- 14. Specifically, one such undercover purchase occurred on May 11, 2017. On that date, law enforcement in the Western District of Pennsylvania used an undercover AlphaBay account to purchase 7 grams of "China white synthetic heroin fentanyl mix" from NarcoBoss's AlphaBay vendor account. Law enforcement provided "Mike Wilson" as the recipient name and provided an undercover address to receive this product.
- 15. On May 17, 2017, U.S. Postal Inspectors retrieved, from the undercover address, a Priority Mail Express parcel addressed to Mike Wilson that weighed approximately 2 ounces and bore tracking number 9270 1901 6491 7301 1690 51. The parcel had a return address of Garcy Lane, 909 Chestnut St, Philadelphia, PA 19107. This parcel was the expected package from NarcoBoss.
- 16. The Priority Mail Express parcel was transported back to the USPIS field office in Pittsburgh, PA, where it was opened and photographically documented. Inside the parcel was a sealed white letter sized envelope. The white envelope was opened and found to contain a clear

zipper plastic bag. The plastic bag was found to contain approximately 10 grams of a fine white powder.

- 17. The white powder was submitted to the USPIS forensic laboratory for chemical analysis. Laboratory analysis determined the white powder weighed 11 grams and contained furanyl fentanyl, a Schedule I controlled substance.
- 18. Due to a number of undercover purchases and interviews of purchasers of NarcoBoss products, law enforcement is aware that NarcoBoss ships from in and around the Philadelphia, PA area.

C. NarcoBoss connection with Prior Vendor

- 19. Based on the below provided information, your Affiant believes that NarcoBoss used the moniker DNMKingpin on AlphaBay prior to using the moniker NarcoBoss.
- 20. Based on law enforcement's review of DNMKingpin's Alphabay vendor profile, your Affiant is aware that DNMKingpin used a Mexican booking photo of Joaquin Chapo Guzman as his profile photograph on AlphaBay. He also sold fentanyl products at a \$40 per gram price, and his public PGP keys on AlphaBay utilized an outdated version of GnuPG key (with the version number v1.4.12 (MingW32)).
- 21. In June 2016, AlphaBay banned DNMKingpin. Two weeks after DNMKingpin was banned, a new vendor with the moniker of NarcoBoss appeared on AlphaBay.
- 22. NarcoBoss used the same Mexican booking photo of Joaquin Chapo Guzman as his profile photograph that DNMKingpin used, used the same outdated version of GnuPG key (with the version number v1.4.12 (MingW32)) that DNMKingpin used, and sold fentanyl products at the same \$40 per gram price. Moreover, both NarcoBoss and DNMKingpin shipped from the Philadelphia, PA area.

D. Attribution

- 23. Law enforcement is aware that much of the fentanyl products illegal sold throughout the United States have been shipped from overseas particularly China. Law enforcement reviewed shipping records for international parcels being delivered to the regions of Philadelphia where NarcoBoss was known to mail fentanyl packages. U.S. Postal Inspections Service, Cyber Divisions initially identified an individual with the initials J.L. as a possible subject due to him receiving a number of suspicious packages from China in the vicinity of the region of Philadelphia where NarcoBoss mailed fentanyl packages.
- 24. However, HSI agents in Portland, Oregon, who are also investigating NarcoBoss, reviewed shipping records for international parcels subsequently identified KOFFIE as NarcoBoss. HSI learned that KOFFIE lives in the vicinity of where packages from NarcoBoss are being shipped, and KOFFIE has had multiple suspicious parcels shipped from China that were delivered to Henry KOFFIE at 300 Berbro Street, Darby, PA 19023. These parcels from China are being sent by shipping agents that HSI and CBP have flagged as shipping companies that have shipped fentanyl and/or fentanyl analogues to the United States.
- 25. For instance, HSI has informed your Affiant that, in March 2017, Mudidi Logistics Limited (MDD) was identified by United States Customs and Border Patrol (CBP) as a shipping agent moving illicit parcels of contraband that were purchased openly on the internet and as a result a joint operation between U.S. and Hong Kong Customs. In April 2017, Hong Kong Customs, at the request of HSI Hong Kong, conducted an operation to examine packages shipped by Hong Kong based shipper MDD. The operation resulted in the seizure of 300 packages in Hong Kong, all of which contained controlled substances, to include fentanyl. Additionally, more than 170 packages were targeted during shipment to the U.S. by the National

Targeting Center-Investigations (NTC-I) and the United States Postal Inspection Service (USPIS). All of the packages that were examined contained controlled substances.

- 26. On February 21, 2017, four (4) parcels were shipped by MDD in Hong Kong to "Henry KOFFIE 300 Berbo Street, Darby, PA 19023". All four packages were manifested as "GIFT X1" with weights 0.613kg, 0.579kg, 0.614kg and 0.593kg respectively.
- 27. HSI has informed your Affiant that, following the law enforcement operation on MDD, MDD shipments virtually stopped and the National Targeting Center observed an uptick in shipping from a company called TY5.
- 28. You Affiant also was informed that, on May 31, 2017, USPIS interdicted an international air mail package suspected of containing fentanyl. The parcel was being shipped by "TY5" from Shanghai, China and addressed to a consignee in Katy, Texas. HSI and USPIS transported the package to the CBP Laboratory and Scientific Services (LSS) facility in Houston, Texas where an extended border search of the package was conducted. A white, powdery substance was found inside the package and a sample was determined through a preliminary analysis that the substance was furanyl fentanyl.
- 29. On May 18, 2017, two (2) parcels were shipped by TY5 from China to "Henry KOFFIE, 300 Berbro Street, Darby, PA 19023". Both parcels were manifested as "COMMERCIAL SAMPLE" with weights 0.345kg and 0.346kg each. A review of records revealed that both of these packages were delivered to the above address.
- 30. On May 18, 2017, one of the parcels shipped by TY5, and manifested as "COMMERCIAL SAMPLE" weighing 0.345kg was seized by CBP. The initial exam revealed a powdery substance, consistent with fentanyl. The powder is currently to the CBP lab awaiting analysis results. The other parcel was delivered.

- 31. KOFFIE had other parcels shipped from China that were seized by CBP. One of the most recent seizures occurred on May 25, 2017. On May 25, 2017, a parcel was shipped by ZXF and destined to Henry KOFFIE at 300 Berbro Street, Darby, PA 19023. The manifests on this parcel was listed as "COMMERCIAL SAMPLE," and the parcel weighed 0.356 kg. This parcel was seized by CBP, and a powdery substance was recovered inside. The powder is currently at the CBP lab awaiting analysis results.
- 32. In addition, law enforcement has reviewed KOFFIE's social media accounts and travel records, which identifies periods when he was traveling to Miami, Phoenix, and elsewhere. These periods of travel correspond with historical posting on NacroBoss's Alphabay vendor page indicating that NarcoBoss was unavailable to take orders during that time period.
- 33. Pennsylvania Department of Labor and Industry records indicate that KOFFIE was last employed by "Waverly Heights LTD" during the 3rd quarter of 2016. Pennsylvania Department of Labor and Industry shows no reported employment for KOFFIE since that time.
- 34. Coinbase, Inc. ("Coinbase") is a digital currency provider. Coinbase provided information that KOFFIE was a past account holder for account 53335e705bcd912fec000e32. Coinbase explained that KOFFIE's digital currency account was cancelled by Coinbase's compliance unit after it was determined that KOFFIE's account had received a high volume of bitcoin from the dark net site AlphaBay.
- 35. KOFFIE's account was established on March 26, 2014 and shut down on September 28, 2017. KOFFIE provided phone number (267) 271-0655 and listed his address as 300 Berbro Street, Darby, PA 19023 as his address. KOFFIE also provided a photo of his Pennsylvania issued driver's license as proof of identity and residence.

- 36. A review of all financial data during the life of the Coinbase account showed that it had transacted a total of 341.7792077 bitcoin (btc). These transactions consisted of the account receiving 289.7967607btc and sending 51.98244699 btc to external bitcoin addresses. Coinbase reported that KOFFIE had purchased 3.15583052 BTC which, at the time of purchase, had the USD equivalent of \$760 and that KOFFIE sold 240.9701443 BTC. KOFFIE received \$127,282.77 from the 240.9701443 BTC that he sold, which was subsequently wired into a TD Bank account ending in x2546 and a Greendot Bank account ending in x3300.
- 37. In May 2016, HSI and other law enforcement agencies in Portland, Oregon were investigating the non-fatal overdose of a Portland State University student. In that investigation, law enforcement recovered a USPS parcel that was shipped by DNMKingpin to Portland. The shipping label on this parcel was handwritten. A review of the handwritten shipping label identified a return address of "210 Walnut Street Floor 2, Darby, Pennsylvania." This address is very similar to the primary residence of KOFFIE who receives parcels with the address "216 Walnut Street 2nd Floor, Darby, PA 19203." Based on my training and experience, your Affiant believes that the slight change in return address is done in an effort to evade law enforcement and conceal KOFFIE's alleged activities.
- 38. KOFFIE maintains a United States passport (#556390897). HSI has obtained a copy of KOFFIE's handwritten passport application that KOFFIE submitted to obtain this passport. Your Affiant, who is not a handwriting expert, compared the handwriting from DNMKingpin's package and KOFFIE's passport application. Based on my review, the handwriting appears to be the same person due to the striking resemblance. Attachment A contains a side by side comparison of the handwriting.

CONCLUSION

39. Based on the above information, your Affiant believes that probable cause exists that HENRY KOFFIE violated Title 21, United States Code, Sections 841(a)(1) (Distribution of Controlled Substances).

The above information is true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

Eric J. Yingling

Special Agent,

Federal Bureau of Investigation

Subscribed and sworn to before me this 3rd day of July, 2017

Robert C. Mitchell

United States Magistrate Judge

