

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

Alexandria Division

UNITED STATES OF AMERICA

v.

WILLIAM ANDERSON BURGAMY IV

Defendant.

FILED UNDER SEAL

Case No. 1:20-mj-130

AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT

I, Samad D. Shahrani, Special Agent with the Federal Bureau of Investigation, first being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am submitting this affidavit in support of an arrest warrant and a criminal complaint charging the defendant, WILLIAM ANDERSON BURGAMY IV (“BURGAMY”), with distribution of controlled substances, including oxycodone and amphetamine, through his use of the Darknet, in violation of Title 21, United States Code, Section 841(a)(1), and committing money laundering by concealing and disguising the nature and source of the illicit proceeds generated through his Darknet drug distribution activities, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”). I have been employed as an FBI Special Agent since September 2011. I am currently assigned to a High Tech Organized Crime squad based at the Northern Virginia Resident Agency of the FBI’s Washington Field Office. I was previously assigned to the FBI’s New York Field Office from

completion of my training in February 2012, until my transfer to the Washington Field Office in April 2019. While in New York, I was assigned to a Cyber Criminal Computer Intrusion squad from approximately October 2012 until April 2019. The focus of that squad was to investigate computer hacking and associated computer-facilitated criminal activity.

3. I have experience investigating violations of narcotics trafficking offenses and computer-facilitated crimes. I have sworn to affidavits in support of arrest warrants and search warrants for computer hacking violations, as well as violations pertaining to illegal narcotics, monies or proceeds derived from the sale of illegal narcotics, and records, ledgers, and documents pertaining to the purchase and sale of controlled substances. I have also conducted and participated in narcotics and money laundering investigations resulting in the arrest and conviction of drug distributors, and seizures of controlled substances, including prescription drugs. As a result, I am familiar with the use, effects, distribution techniques, appearance, and method of manufacture of controlled substances. Additionally, I am familiar with the functioning and structure of narcotics markets operating on internet-based Darknets (“Darknet markets”) including the operations of Darknet market administrators (“admins”), the sellers on such markets (“vendors”), and the purchasers on such markets (“buyers”).

4. This affidavit is intended to show merely that there is probable cause for the requested criminal complaint and arrest warrant, and does not set forth all of my or the government’s knowledge about this matter. All information contained in this affidavit is either personally known to me, has been communicated to me by other law enforcement officers, or has been described in reports, records, or documents gathered during this investigation that I have reviewed. When I assert that a statement was made by an individual, that statement is described

in substance and in part, but my assertion is not necessarily intended to constitute a verbatim recitation of the entire statement.

TECHNICAL BACKGROUND

5. Digital currency (also known as cryptocurrency) is generally defined as an electronic-sourced unit of value that can be used as a substitute for fiat currency (*i.e.*, currency created and regulated by a government). Digital currency exists entirely on the internet and is not stored in any physical form. Digital currency is not issued by any government, bank, or company and is instead generated and controlled through computer software operating on a decentralized peer-to-peer network. Digital currency is not illegal in the United States and may be used for legitimate financial transactions. However, digital currency is often used for conducting illegal transactions, such as the sale of controlled substances.

6. Bitcoin¹ is a type of digital currency. Bitcoin payments are recorded in a public ledger that is maintained by peer-to-peer verification and is thus not maintained by a single administrator or entity. Individuals can acquire Bitcoins either by “mining” or by purchasing Bitcoins from other individuals. An individual can “mine” for Bitcoins by allowing his/her computing power to verify and record the Bitcoin payments into a public ledger. Individuals are rewarded for this by being given newly created Bitcoins.

7. An individual can send and receive Bitcoins through peer-to-peer digital transactions or by using a third-party broker. Such transactions can be done on any type of computer, including laptop computers and smart phones.

¹ Between December 31, 2019 and April 3, 2020, the value of one Bitcoin fluctuated between approximately \$3,858.00 USD and approximately \$10,476.88 USD according to Coinbase, a cryptocurrency exchange that, among other cryptocurrencies, deals in Bitcoin.

8. Bitcoins can be stored in digital “wallets.” A digital wallet essentially stores the access code that allows an individual to conduct Bitcoin transactions on the public ledger. To access Bitcoins on the public ledger, an individual must use a public address (or “public key”) and a private address (or “private key”). The public address can be analogized to an account number while the private key is like the password to access that account.

9. Even though the public addresses of those engaging in Bitcoin transactions are recorded on the public ledger, the true identities of the individuals or entities behind the public addresses are not recorded. If, however, a real individual or entity is linked to a public address, it would be possible to determine what transactions were conducted by that individual or entity. Bitcoin transactions are, therefore, described as “pseudonymous,” meaning they are partially anonymous.

10. Through the dark web or Darknet, which are websites accessible only through encrypted means, individuals have established online marketplaces for narcotics and other illegal items. These markets often only accept payment through digital currencies, such as Bitcoin. Accordingly, a large amount of Bitcoin sales or purchases by an individual is often an indicator that the individual is involved in narcotics trafficking or the distribution of other illegal items. Individuals intending to purchase illegal items on Darknet websites need to purchase or barter for Bitcoins. Further, individuals who have received Bitcoin as proceeds of illegal sales on Darknet websites need to sell their Bitcoin to convert them to fiat (government-backed) currency. Such purchases and sales are often facilitated by peer-to-peer Bitcoin exchangers, who advertise their services on websites designed to facilitate such transactions.

11. Darknet sites, such as Empire, Cryptonia, and Apollon, primarily operate on the Tor network. The Tor network (“Tor”) is a special network of computers on the Internet,

distributed around the world, that is designed to conceal the true Internet Protocol (“IP”) addresses of the computers accessing the network, and, thereby, the locations and identities of the network’s users. Tor likewise enables websites to operate on the network in a way that conceals the true IP addresses of the computer servers hosting the websites, which are referred to as “hidden services” or “onion services” (“hidden services”) on the Tor network. Such “hidden services” operating on Tor have complex web addresses, generated by a computer algorithm, which end in “.onion” and can only be accessed through specific web browser software designed or adapted to access the Tor network. These addresses are either 16 characters long (version 2 or v2) or 56 characters long (version 3 or v3).

PROBABLE CAUSE

NEVERPRESSED RX Darknet Vendor

12. Since in or about December 2019, the FBI has been investigating a Darknet market vendor account operating under the name NEVERPRESSED RX. NEVERPRESSED RX has been operating as a vendor on at least two Darknet markets, Empire Market (“Empire”) and Apollon Market (“Apollon”).

13. According to the vendor profile, the NEVERPRESSED RX account has been a member of Empire since on or about August 21, 2019. Based on my training and experience, I know that achieving such a high positive rating for a vendor is extremely difficult and indicates that the quality of the drugs and the customer service provided by a particular vendor is likely high. In the “About” section of NEVERPRESSED RX’s profile, the vendor provided an e-mail address of NeverPressedRX@secmail.pro, a Jabber² chat address of

² Jabber is the previous name for what is now called XMPP, the Extensible Messaging and Presence Protocol, which allows instant messaging.

nprx@jabber.calyxinstitute.org, and a Wickr³encrypted chat ID of NPRX. A review of the Empire NEVERPRESSEDRX account on April 3, 2020 revealed that the account had 2543 sales, a vendor level of 7 and a trust level of 7 with 99.95% positive reviews.

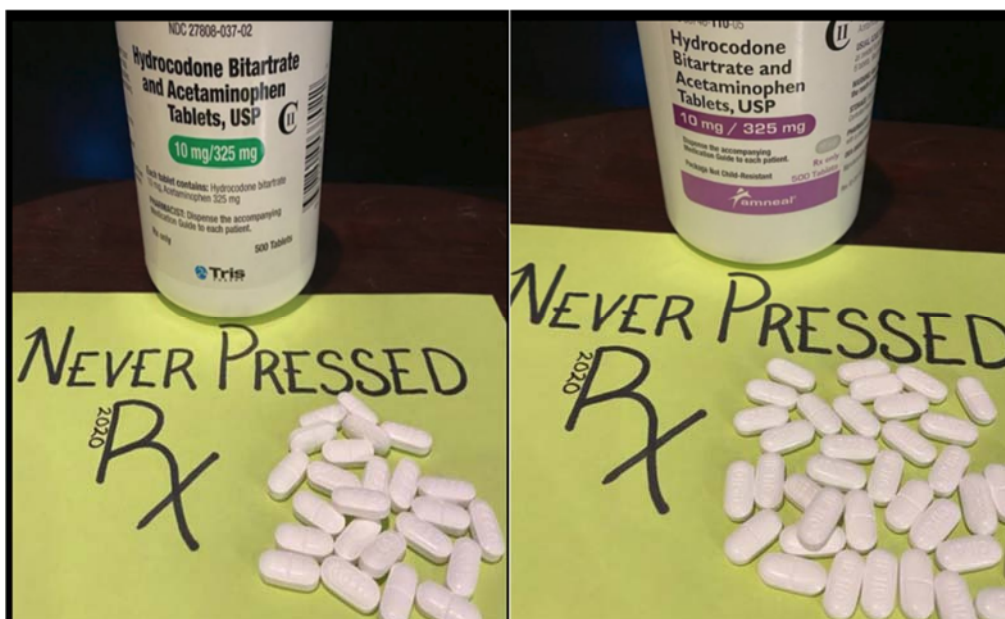
14. From at least January 3, 2020 through April 3, 2020, in that same “About” section, NEVERPRESSEDRX made the following statements regarding the source of the pills being sold: “All of our stock comes directly from a US Pharmacy,” “All of our listings feature pictures of the exact medication the listing is for. Therefore if you see that the pills are from a certain manufacturer in the picture, rest assured your order will be shipped with the medication as pictured in that listing, from that same manufacturer guaranteed,” and “Thanks for taking the time to stop by NeverPressedRX, as stated in our name, we will NEVER sell pressed pills.”

15. From at least January 3, 2020 through on or about April 3, 2020, a review of NEVERPRESSEDRX’s listings on Empire revealed that several of the listings included photographs of pills in front of bottles consistent in labeling with the type of bottles used to distribute medication to pharmacies, along with handwritten signs with the words “Never Pressed RX 2019” or “Never Pressed RX 2020” written on them. Included below are images from NEVERPRESSEDRX’s listings on Empire, observed on or about January 3, 2020, for alprazolam (*i.e.*, Xanax®), a Schedule IV controlled substance, and oxycodone/acetaminophen 5mg/325mg tablets (*i.e.*, Percocet®), a Schedule II controlled substance. The labeling on the bottles indicated that they were manufactured holding 1000 tablets of alprazolam and 500 tablets of oxycodone/acetaminophen, respectively.

³ The Wickr instant messaging application permits users to exchange end-to-end encrypted and content-expiring messages, including photos, videos, and file attachments.



16. Included below are images from NEVERPRESSED RX's listings on Empire, observed on March 16, 2020, for two brands of Hydrocodone Bitartrate and acetaminophen (*i.e.*, Lortab® or Vicodin®) 10mg/325mg tablets, a Schedule II controlled substance. The labeling on the bottles indicates that they were manufactured holding 500 tablets of hydrocodone each.



The First Undercover Purchase

17. Beginning on January 3, 2020, an FBI employee, operating in an undercover capacity, contacted NEVERPRESSED RX via the encrypted Wickr application. The icon for the NPRX account on Wickr was the same as the icon displayed on the NEVERPRESSED RX vendor page on Empire. The FBI undercover employee eventually moved to communicating with NEVERPRESSED RX via the NeverPressedRX@secmail.pro e-mail account listed above.

18. On January 6, 2020, NEVERPRESSED RX e-mailed the FBI undercover employee an encrypted price sheet listing a variety of controlled substances available for purchase, including Klonopin® (Schedule IV), Xanax® (Schedule IV), diazepam (Schedule IV), Ativan® (Schedule IV), oxycodone (Schedule II), hydrocodone (Schedule II), clonidine (unscheduled prescription drug), Adderall® (Schedule II), and tramadol (Schedule IV), in a variety of strengths. The FBI undercover negotiated to buy 20 oxycodone 5/325s, a combination of oxycodone and acetaminophen, also known as Percocet®, which is a Schedule II controlled substance. NEVERPRESSED RX provided a Bitcoin address to which the payment should be sent (“NPRX payment address”). The FBI undercover employee subsequently transferred the payment of 0.02400203 Bitcoin (at the time worth approximately \$190 USD) to the NPRX payment address and provided NEVERPRESSED RX with an encrypted shipping address, located in the Eastern District of Virginia, and proof of payment via encrypted e-mail message.

19. On January 8, 2020, a United States Postal Inspector retrieved a package from a Post Office located in the Eastern District of Virginia and provided it to the FBI. Subsequent physical examination revealed the package to contain 20 pills that were consistent in physical appearance with genuine prescription narcotics. Laboratory tests are pending to confirm that these pills are, in fact, Percocet®.

The Second Undercover Purchase

20. On January 14, 2020, a Food and Drug Administration (“FDA”) Special Agent assigned as an FBI Task Force Officer (“TFO”), operating in an undercover capacity, made a purchase of 22 Adderall® Instant Release (“IR”) 20mg pills, a Schedule II controlled substance, from NEVERPRESSEDRX using the NeverPressedRX@secmail.pro address.

NEVERPRESSEDRX provided the FDA undercover TFO the same Bitcoin address for payment that NEVERPRESSEDRX had previously provided to the FBI undercover employee on January 6, 2020. The FDA undercover TFO provided NEVERPRESSEDRX with a mailing address located in the Eastern District of Virginia.

21. On January 15, 2020, the FBI undercover employee and the FDA undercover TFO received an e-mail at their respective undercover e-mail addresses. The e-mail was from NeverPressedRX@secmail.pro and titled “NPRX Important Updates.” The e-mail contained the following text:⁴

Just so you know we are going to being slowly relisting products on empire market with price increase due to the risk we are taking with possible exiting and us getting screwed over and not receiving all of the funds in our escrow . We will of-course continue to accept orders via email and prioritize email orders like we have for the past few years. Email ordering prices are not changing and everything will continue as usual. Please contact us if you have any questions as we are just updating all of our loyal clients and attempting to be fully transparent in keeping everyone in the loop. Its your choice how you want to order, I am sure as most of you know, if an order is paid for, that order gets shipped. We don't fuck around or play games, this is a business for us and we run it as a five star business should be run.

Best regards
NPRX

22. A review of the e-mail header information revealed that this message appeared to have been sent using Mailchimp, an e-mail marketing platform.

⁴ All communications contained in this affidavit from NEVERPRESSEDRX are set forth as originally written, including with respect to capitalization, punctuation, and spelling.

23. On January 16, 2020, the FBI undercover employee and the FDA undercover TFO received another e-mail at their respective undercover e-mail addresses from NeverPressedRX@secmail.pro, this time titled "Weekly Update." The e-mail contained the following text:

WEEKLY UPDATE

-----BEGIN PGP SIGNED MESSAGE-----

Hash: SHA256

UPDATES

- - Due to how extremely fast our Oxycodone HCL move we are currently taking multiple steps to ensure we are able to keep a fully stocked inventory for our clients, regardless of the quantity that you want to purchase at any time. However, please be patient and know we are working hard to accomplish this for you. This is not an easy task due to the fact that we guarantee all of our products are sourced directly from manufactures in sealed bottles and authenticity is never a question. We will never succumb to purchasing drugs off the street that could be potentially tampered with for your safety and will not jeopardize our reputation just because demand is higher than current supply. What we will continue to do just as we have done in the past is update all direct buyers when we have new oxycodone ccl without Tylenol in stock a day in advance prior to posting these tablets on the marketplace, if they even make it to the market place at all.

- - We also added a new supplier who will be providing us with the old school oxycontin 40mg and 80mg tablets that should arrive in the next 2-3 weeks, we will update as soon as we have them in our possession. They are the tablets that say OC not OP, these are manufactured by a subsidiary of Purdue Pharma the only company ever to be allotted patent that does not ever expire.

- - We also found a supplier who is going to be supplying us with 2mg Pfizer Xanax bars that will be here around the same time.

- - We Have about 200 15mg Oxycodone HCL tablets (100 Mallinckrodt nom de plume M-BOX / 100 KVK TECH (markings K|8)) that we will make available for order as of now, please email and request amount remaining prior to just sending BTC/XMR first come first serve we will prioritize emails first come first serve to be fair to everyone . Let us know if you prefer one brand over the other.

- - 15mg oxycodone hcl cost - \$30.00

- - Since we continue to grow in size we are in the process of having a website built that will function almost identical to any typical marketplace other than the fact that you will not have to store funds in a market wallet, when you want to make a purchase a BTC/XMR payment address will be generated and you will send coin to order, we are keeping it simple and trying to make it as convenient as possible for everyone and investing a decent amount of money into this. It will keep inventory of everything to make things run a little easier and so that everything will not have to be done via email. It will have pgp encrypted messaging built directly into the site.

-- In the next few days we will be receiving a few hundred of the pink oxycodone 10s, we will send out an email to give everyone notice prior to placing on market once we have them in our possession. We have plenty of everything else that you are used to us offering so if you need to place an order just send us an email and we will make sure we get your package out to you as soon as we can.

Please email with any questions.

Best Regards,

NPRX

-----BEGIN PGP SIGNATURE-----

<PGP Signature omitted from this affidavit for readability>

-----END PGP SIGNATURE-----

24. The FBI undercover employee used GPG software, an open-source implementation of the PGP or “Pretty Good Privacy” encryption standard, to verify that the message was a genuine signed message. I know from my training and experience that in order to sign a PGP message, and have the message validate, the signer must have access to the private key associated with the signing account, in this case NeverPressedRX@secmail.pro. Typically, private keys are controlled by one individual or a small group of individuals and not widely shared. This is because access to the private key is required to read messages that are encrypted with the corresponding public key, and also allows the possessor to sign messages. Wide distribution of a private key therefore defeats the purpose of having an encrypted communication channel. The FBI undercover employee reported that the verification of the January 16, 2020 NPRX message was successful and that the message had been signed by “never pressed rx <neverpressedrx@secmail.pro>.”

25. Records obtained from Mailchimp indicated that Mailchimp had an account under the name “NPRX,” display name “MR NPRX,” associated with e-mail address NeverPressedRX@secmail.pro, and that the account had been created on December 19, 2019. The Mailchimp records also indicated that the NPRX account was created from IP address 73.134.88.148, assigned to Comcast. Records obtained from Comcast revealed that the

subscriber for that IP address was WILLIAM BURGAMY IV, with a service address of [redacted], Hanover, MD 21076 (“the Hanover residence”), a billing address of [redacted], Baltimore, MD 21221, and a contact telephone number of 443-908-[redacted]. The Comcast service to the Hanover residence was listed as having commenced on June 25, 2019, and the IP address 73.134.88.148 had been assigned to that residence from at least July 19, 2019, through January 13, 2020. The records associated with the NPRX Mailchimp account also included the undercover e-mail addresses of the FBI and FDA undercover agents as part of a Mailchimp mailing list maintained by the NPRX Mailchimp account. According to information from the State of Maryland Board of Pharmacy, BURGAMY is not a licensed pharmacist.

26. On January 17, 2020, an FDA Special Agent retrieved the delivered FDA undercover TFO package from a covert mailbox located in the Eastern District of Virginia. The package was determined to contain what appeared to be 22 Adderall® IR 20mg pills, which was consistent with the order placed by the FDA undercover TFO with NEVERPRESSED RX on January 14, 2020. The FDA’s Forensic Chemistry Center confirmed that the pills contained amphetamine, a Schedule II controlled substance, which is the active ingredient in Adderall®.

The Third and Fourth Undercover Purchases

27. On January 21, 2020, the FDA undercover TFO made a purchase of 22 Adderall® Instant Release (“IR”) 20mg pills, a Schedule II controlled substance, from NEVERPRESSED RX using the NeverPressedRX@secmail.pro address. NEVERPRESSED RX provided the FDA undercover TFO the same Bitcoin address for payment that had previously been provided to the FBI undercover employee on January 6, 2020, and to the FDA undercover TFO on January 14, 2020. The FDA undercover TFO provided NEVERPRESSED RX with a mailing address located in the Eastern District of Virginia.

28. Also on January 21, 2020, the FBI undercover employee made a purchase of 10 oxycodone 15mg pills, a Schedule II controlled substance, from NEVERPRESSED RX using the NeverPressedRX@secmail.pro address. NEVERPRESSED RX provided the FBI undercover employee with the same NPRX deposit address previously provided to the FBI undercover employee on January 6, 2020, and to the FDA undercover TFO on January 14, 2020 and January 21, 2020. The FBI undercover employee provided NEVERPRESSED RX with a mailing address located in the Eastern District of Virginia.

29. On January 22, 2020, law enforcement observed BURGAMY exiting the Hanover residence via the garage, entering a black 2019 Lexus SUV with Florida license plates, and driving to the Odenton Post Office located at 1177 Annapolis Rd, Odenton, MD. Law enforcement subsequently observed BURGAMY walking with what appeared to be United States Postal Service mailing envelopes in his hands. BURGAMY appeared to place the mailing envelopes in a particular blue post office box located outside the Odenton Post Office. BURGAMY then walked away with nothing in his hands, returned to the black Lexus SUV, and drove away. A selection of photographs taken during the surveillance are included below:





30. Shortly after BURGAMY left the area, a United States Postal Inspector reviewed the contents of the particular blue post office box and located seven United States Postal Service mailing envelopes. Two of these mailing envelopes had shipping addresses matching those provided to NEVERPRESSEDRX by the FBI and FDA undercover federal agents on January 21, 2020. The seven packages were photographed and returned to the mail stream.

31. On January 27, 2020, FBI Special Agents retrieved the delivered FBI undercover employee package from a covert mailbox located in the Eastern District of Virginia. The package was determined to contain what appeared to be 10 oxycodone 15mg pills, which was consistent with the order placed by the FBI undercover employee with NEVERPRESSEDRX on January 21, 2020. A sample of one of these pills field tested a presumptive positive for the presence of oxycodone. On March 25, 2020, the Drug Enforcement Administration's ("DEA") Mid-Atlantic Laboratory confirmed that the pills contained oxycodone, a Schedule II controlled substance.

32. Also on January 27, 2020, a DEA Special Agent, assigned as an FBI TFO, retrieved the delivered FDA undercover TFO package from a covert mailbox located in the Eastern District of Virginia. The package was determined to contain what appeared to be 22 Adderall® IR 20mg pills, which was consistent with the order placed by the FDA undercover TFO on January 21, 2020. These pills have been submitted for laboratory testing.

The Fifth Undercover Purchase

33. On January 30, 2020, the FBI undercover employee made a purchase of 20 oxycodone 30mg pills, a Schedule II controlled substance, from NEVERPRESSED RX using the NeverPressedRX @secmail.pro address. NEVERPRESSED RX provided the FBI undercover employee with the same NPRX deposit address previously provided to the FBI undercover employee on January 6, 2020 and January 21, 2020, and to the FDA undercover TFO on January 14, 2020 and January 21, 2020. The FBI undercover employee provided NEVERPRESSED RX with a mailing address located in the Eastern District of Virginia.

34. On January 30, 2020, law enforcement observed BURGAMY exiting the Hanover residence via the garage, entering the black Lexus SUV, and driving to the Odenton Post Office. Law enforcement subsequently observed BURGAMY walking with what appeared to be multiple United States Postal Service mailing envelopes and approaching the same particular blue mailbox described above. BURGAMY appeared to deposit the packages in the mailbox, and then walked back to the black Lexus SUV with nothing in his hands. A selection of photographs taken during the surveillance are included below:



35. Shortly after BURGAMY left the area, a United States Postal Inspector reviewed the contents of the particular blue post office box and located 18 United States Postal Service mailing envelopes. The mailing address of one of the packages matched the address provided by the FBI undercover employee to NEVERPRESSEDRX in the order placed on the morning of January 30, 2020. The 18 packages were photographed and returned to the mail stream.

36. On February 3, 2020, FBI Special Agents retrieved the package that had been ordered by the FBI undercover employee on January 30, 2020. The package was delivered to a covert mailbox located in the Eastern District of Virginia. Subsequent examination determined that the package contained what appeared to be 20 30mg oxycodone pills, which was consistent with the order placed by the FBI undercover employee with NEVERPRESSED RX on January 30, 2020. A sample of one of these pills field tested a presumptive positive for the presence of oxycodone. On March 23, 2020, the DEA's Mid-Atlantic Laboratory confirmed that the pills contained oxycodone, a Schedule II controlled substance.

The Sixth Undercover Purchase

37. On February 5, 2020, the FDA undercover TFO made a purchase from NEVERPRESSED RX. The purchase consisted of 20 Adderall® IR 20 mg pills and an additional \$160 USD for “however many 15mg or 30mg oxys you [referring to NEVERPRESSED RX] can send me [referring to the FDA undercover TFO].” In a subsequent Wickr message, NEVERPRESSED RX advised that the FDA undercover TFO had a choice of “5 pink oxy 10s (\$100) and 2 oxy 15s (\$60) or if he likes the ones with tylenol better I have some 5/325 which would equal out to be 16 oxy 5/325s.” The FDA undercover TFO chose the five oxycodone 10mg pills and the two oxycodone 15mg pills (in addition to the 20 20mg Adderall® IRs). The FDA undercover TFO provided NPRX with a mailing address located in the Eastern District of Virginia.

38. On February 6, 2020, law enforcement observed BURGAMY exiting the Hanover residence via the garage, entering the black Lexus SUV, and driving to the Odenton Post Office. Law enforcement subsequently observed BURGAMY walking with what appeared to be multiple United States Postal Service mailing envelopes and approaching the same particular

blue mailbox described above. BURGAMY appeared to deposit the packages, and then walked back to the black Lexus SUV with nothing in his hands. A selection of photographs taken during the surveillance are included below:



39. After BURGAMY left the area, a United States Postal Inspector reviewed the contents of the particular blue post office box and located 15 United States Postal Service mailing envelopes. One of those packages displayed a mailing address that matched the address

provided by the FDA undercover TFO in the order to NEVERPRESSEDRX on February 5, 2020. The 15 packages were photographed and returned to the mail stream.

40. On February 10, 2020, an FDA Special Agent retrieved the delivered FDA undercover TFO package from a covert mailbox located in the Eastern District of Virginia. The package was determined to contain what appeared to be 20 Adderall® IR 20mg pills, five oxycodone 10mg pills, and two oxycodone 15mg pills, which was consistent with the order placed by the FDA undercover TFO with NEVERPRESSEDRX on February 5, 2020. These pills have been submitted for laboratory testing.

BURGAMY's Money Laundering Scheme

41. As noted above, on January 6, 2020, the FBI undercover employee sent 0.02400203 Bitcoin (at the time worth approximately \$190 USD worth of Bitcoin) to the NPRX payment address in order to pay for the above-described 20 Percocet® pills. Analysis of the NPRX payment address revealed that, between September 2019 and March 2020, a large portion of the funds received by the NPRX payment address were subsequently sent to Bitcoin addresses associated with an account at Coinbase, a cryptocurrency exchange.

42. Records obtained from Coinbase revealed that the account is subscribed in the name of WILLIAM BURGAMY, e-mail address wburgamy@[redacted], telephone number 443-908-[redacted], and a billing address of [redacted], Baltimore, MD. The telephone number and billing address are identical to the records provided by Comcast associated with the IP address 73.134.88.148, and the name is nearly identical, except missing the "IV." Coinbase also provided "Know Your Customer" data that included a photograph of BURGAMY's Maryland Driver's license in the name of WILLIAM ANDERSON BURGAMY 4TH and displaying the Baltimore address, and a "selfie" of BURGAMY sitting in what appears to be an office. Based

on my training and experience, I know that Bitcoin exchanges frequently request customers to take photographs of themselves as part of their “Know Your Customer” obligations.

43. Based on a review of records available on the public blockchain, as well as a review of the Coinbase records, on January 6, 2020, approximately 16 minutes after receiving the deposit from the FBI undercover employee, the NPRX payment address transferred 0.02400203 Bitcoin (at the time worth approximately \$190 USD), to another Bitcoin address (“intermediary Bitcoin address”).

44. On January 7, 2020, the intermediary Bitcoin address was part of a transaction that sent 0.3497 Bitcoin (at the time worth approximately \$2,704 USD) to a specific Bitcoin address associated with BURGAMY at Coinbase. Approximately one hour later, 0.3497 Bitcoin was sold by the user of the account to Coinbase for \$2,699.13 USD. Shortly thereafter \$2,699.13 USD was withdrawn from BURGAMY’s Coinbase account to a PayPal account in BURGAMY’s name. Based on a review of PayPal records, the \$2,699.13 USD was then withdrawn from the PayPal account, less a \$10 USD transaction fee, and, based on review of documents provided by Navy Federal Credit Union (NFCU), \$2,689.13 USD was deposited on January 7, 2020, into a NFCU premium business checking account in the name of BWC Coastal Consulting LLC.

45. A review of records obtained from NFCU revealed that BURGAMY was listed as “Owner 1” and “CEO and Managing Member” for the NFCU accounts associated with BWC Coastal Consulting LLC. Based on review of the NFCU records, funds from this account were subsequently used to pay for various expenditures, including a January 8, 2020 purchase at a Shell Service Station in Jessup, Maryland, and an approximate \$900 USD Verizon Wireless bill. Also on January 8, 2020, \$2,500 USD was transferred from the BWC premium business

checking account into a NFCU Everyday Checking account in the name of William A. Burgamy IV.

46. Records obtained from Coinbase revealed that the BURGAMY account had been accessed from the 73.134.88.148 Comcast IP address multiple times beginning on July 22, 2019 and through at least March 12, 2020, to include January 6, 2020 and January 13, 2020. As previously noted, records obtained from Comcast revealed that the subscriber for that IP address was WILLIAM BURGAMY IV, with a service address of [redacted], Hanover, MD 21076 (previously abbreviated as “the Hanover residence”), a billing address of [redacted], Baltimore, MD 21221, and a contact telephone number that was identical to the subscriber information obtained from Coinbase. The Comcast service to the Hanover residence was listed as having commenced on June 25, 2019, and the IP address 73.134.88.148 had been assigned to that residence from at least July 19, 2019, through January 13, 2020.

47. As noted previously, on January 21, 2020, the FBI undercover employee made a purchase from NEVERPRESSED RX, sending 0.03444318 Bitcoin (at the time worth approximately \$330 USD), to the NPRX payment address.

48. Based on a review of records available on the public blockchain, as well as a review of the Coinbase records, on January 22, 2020, the NPRX payment address then transferred .07551524 Bitcoin (at the time worth approximately \$658 USD) to a second intermediary Bitcoin address (“second intermediary address”). Also on January 22, 2020, the second intermediary address sent .07551524 Bitcoin to a specific Bitcoin address associated with BURGAMY at Coinbase. Approximately 25 minutes later, the user of the account sold .1520533 Bitcoin for \$1,287 USD. Approximately one minute later, \$1,288 USD was withdrawn from BURGAMY’s Coinbase account to a PayPal account in BURGAMY’s name. Based on

review of records from PayPal, the \$1,288 USD was then withdrawn from the PayPal account, less a \$10 USD transaction fee, and, based on review of NFCU records, deposited as \$1,278 USD on January 23, 2020 into a NFCU premium business checking account in the name of BWC Coastal Consulting LLC. On January 24, 2020, \$200 USD was transferred from the BWC premium business checking account into a NFCU Everyday Checking account in the name of William A. Burgamy IV.

49. As noted previously, on January 30, 2020, the FBI undercover employee made a purchase from NEVERPRESSEDRX, sending 0.11136596 Bitcoin (at the time worth \$1,040 USD) to the NPRX payment address.

50. Based on a review of records available on the public blockchain, as well as a review of the Coinbase records, on January 30, 2020, the NPRX payment address then transferred 0.11136596 Bitcoin directly to a specific Bitcoin address associated with BURGAMY at Coinbase. Approximately one hour later, the user of the account sold 0.18096645 Bitcoin for \$1,691.11 USD. Approximately 1 minute later, \$1,691.79 USD was withdrawn from the Coinbase account. Based on review of NFCU records, on January 30, 2020, \$1,290 USD was deposited from a PayPal account into the NFCU premium business checking account in the name of BWC Coastal Consulting LLC.

Recent Statements from NEVERPRESSEDRX Regarding the Coronavirus and Inventory

51. In a March 20, 2020 email to the FBI undercover employee, NEVERPRESSEDRX indicated that they had the following in stock and available for purchase: diazepam/Valium®, a Schedule IV controlled substance, in 5mg and 2mg doses; Ativan, a Schedule IV controlled substance, in .5mg and 1mg doses; “hydro 5s,” which your affiant believes refers to 5mg/325mg hydrocodone/acetaminophen, also known as Lortab® or

Vicodin®, a Schedule II controlled substance; and tramadol, a Schedule IV controlled substance. In the same e-mail, NEVERPRESSEDRX stated they were “waiting for alot of shit to arrive this corona virus is fucking up inventory.”

52. On March 30, 2020, the FBI undercover employee observed a PGP-signed posting on NEVERPRESSEDRX’s Empire market vendor page that read, in part, “**Even with Corona Virus the shop is running at full speed**” (emphasis supplied).

53. On April 3, 2020, the FBI undercover employee observed a PGP-signed posting on NEVERPRESSEDRX’s Empire market vendor page that read, in part, as follows:

“April the 8th is the day we have all been waiting for, we have finally been able to get a solid date on our entire restock (0.5 alprazolam, 1mg alprazolam, 1mg clonazepam, 5mg diazepam, 10mg diazepam, 1mg Ativan, 5/325 hydrocodone, 5,7.5 and 10mg hydrocodone, 10mg,15mg and 30mg oxycodone hcl. Sorry things have taken this long but when you only deal with authentic product sometimes you have to wait for things like this to happen.

GUARENTEED (sic): ALL OF OUR MEDS ARE DIRECTLY FROM US BASED MANUFACTURES (sic) AND RECEIVED IN THE SEALED BOTTLES THAT ARE PICTURED IN THE LISTINGS. WE WILL NEVER SUBSTITUTE ANY ORDER, WHAT YOU SEE IS WHAT YOU WILL RECEIVE. IF WE HAVE MULTIPLE BRANDS OF PRODUCTS THEN EACH MANUFACTURE (sic) WILL HAVE ITS OWN LISTING JUST LIKE WE CURRENTLY HAVE FOR THE 2 BRANDS OF 5MG HYDROCODONES THAT WE OFFER.

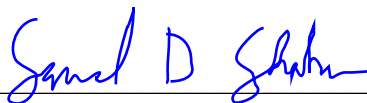
BEST REGARDS
NPRX”

CONCLUSION

54. The foregoing demonstrates that BURGAMY distributed prescription drugs through his use of the Darknet, and subsequently laundered the proceeds generated through his unlawful Darknet drug distribution activities in order to conceal and disguise the nature and source of those illicit funds.

55. Accordingly, there is probable cause to believe that, from at least in or about January 2020, including January 22, 2020, up to and including the date of this affidavit, both dates being approximate, in the Eastern District of Virginia and elsewhere, the defendant WILLIAM ANDERSON BURGAMY IV, distributed controlled substances, including oxycodone and amphetamine, in violation of Title 21, United States Code, Section 841(a)(1),

56. Furthermore, there is also probable cause to believe that, on or about January 6, 2020, January 7, 2020, January 22, 2020, January 23, 2020, and January 30, 2020, in the Eastern District of Virginia and elsewhere, the defendant WILLIAM ANDERSON BURGAMY IV, knowingly conducted financial transactions affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activity, to wit, distribution of Schedule II controlled substances in violation of Title 21, United States Code, Section 841(a)(1), knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).



Samad D. Shahrani
Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with Fed. R. Crim. Proc. 4.1 by telephone on April 7, 2020.



Hon. Ivan D. Davis
United States Magistrate Judge