

19-mj-7285-JCB

AFFIDAVIT OF CHRISTOPHER J. MULLEN

I, Christopher J. Mullen, being duly sworn, state the following:

1. I have been employed as a Postal Inspector with the United States Postal Inspection Service (“USPIS”) since August 2017. I have been assigned to the Prohibited Mail Narcotics Unit of the USPIS’s Boston Division since August 2017. Before becoming a Postal Inspector, I was employed as a Special Agent with the United States Secret Service (“Secret Service”) beginning in 2009. From 2010 through 2017, I was assigned to the Secret Service’s Boston Field Office, where I investigated financial crimes and other violations of federal law. Prior to becoming a Special Agent, I was an Officer with the Secret Service’s Uniformed Division, beginning in June 2005.

2. I have received both general training in conducting criminal investigations as well as specialized training concerning the investigation of offenses involving the distribution of controlled substances. I attended a three-month Criminal Investigator Training Course at the Federal Law Enforcement Training Center in Glynco, Georgia, and a four-month training course at the Secret Service’s John J. Rowley Training Center in Beltsville, Maryland. I have received training by the USPIS in the investigation of controlled substances and proceeds/payments for controlled substances being transported through the United States mails. I have a Bachelor of Arts in Philosophy from Boston College and a Masters of Business Administration from The George Washington University.

3. I have participated in numerous narcotics investigations involving the transportation of controlled substances or proceeds from the sales of (or payments for) controlled substances through the United States Postal Service (“USPS”), money laundering,

and related crimes. Many of these investigations have had national or international connections, and many required me to work closely and share information and intelligence with members of other law enforcement agencies, including the Federal Bureau of Investigation (“FBI”), the Drug Enforcement Agency (“DEA”), the Massachusetts State Police (“MSP”), and the police departments of local communities including Boston. I have debriefed, and continue to debrief, suspects, informants, and witnesses who have personal knowledge about the sale and distribution of narcotics, money laundering, and related crimes occurring in Massachusetts and nationally.

4. I am submitting this affidavit in support of an application for a criminal complaint charging that, beginning on a date unknown but not later than in or about November 2018, and continuing through on or about July 31, 2019, in Boston and Somerville in the District of Massachusetts, and elsewhere, Brandon GREENBERG (“GREENBERG”), a/k/a “Adrian,” conspired with persons known and unknown to knowingly and intentionally distribute and possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine in violation of 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A)(viii).

5. I have personally participated in the investigation discussed in this affidavit since February 13, 2019, and I am familiar with the facts discussed below. I am also familiar with the facts and circumstances of this investigation from oral and written reports by me and other Postal Inspectors with the USPIS, agents and/or task force officers with the Drug Enforcement Administration (“DEA”), officers from the Boston Police Department, and members of the Massachusetts State Police (“MSP”), who have assisted in this investigation. I have also reviewed various business and financial records from various entities, including the USPS, Western Union, and Sprint. This affidavit does not contain each and every fact I know about

this investigation. This affidavit only sets forth sufficient facts to demonstrate probable cause for a search warrant.

I. **GENERAL BACKGROUND CONCERNING THE SHIPMENT OF DRUGS AND DRUG SALE PROCEEDS THROUGH THE UNITED STATES MAILS**

6. Experience and drug trafficking intelligence information gathered by the USPIS have demonstrated that USPS Priority Mail Express and Priority Mail are frequently used by drug traffickers for shipping drugs and the proceeds from drug sales. Use of Priority Mail Express and Priority Mail are favored because of the speed, reliability, free telephone and Internet parcel tracking service, as well as the perceived minimal chance of detection. Priority Mail Express was originally intended for urgent, business-to-business, correspondence. However, based on USPIS intelligence and my personal experience with numerous prior parcels that were found to contain contraband, these types of parcels containing contraband are usually sent from one individual to another individual.

7. In an effort to combat the flow of controlled substances through the United States mails, interdiction programs have been established in cities throughout the United States by the USPIS. These cities have been identified as known sources of controlled substances. The USPIS conducted an analysis of prior parcels which were found to contain drugs and drug proceeds. The analysis of prior parcels that were found to contain drugs or drug proceeds indicated that these parcels were usually from an individual to an individual. In the few cases when Express Mail parcels containing drugs or drug proceeds have displayed a business or company name, it was usually proven to be a fictitious business or company, or, in certain cases, a legitimate company whose name was being used without the knowledge or authorization of that business. Additionally, this analysis established a series of parcel characteristics which,

when a parcel is found with a combination of two or more characteristics described below, have shown high probability that the parcel will contain a controlled substance or the proceeds of controlled substance sales. These characteristics include the following: (1) parcel was mailed from or addressed to a narcotic source city; (2) parcel has a fictitious return/sender address or name; (3) parcel has address information which is handwritten; (4) the handwritten mailing label on the parcel does not contain a business account number, thereby indicating that the sender paid cash; (5) parcel is addressed from an individual to an individual; and (6) parcel is heavily taped.

8. Based on my training and experience and USPIS intelligence, the characteristics in paragraphs six and seven are indicative of parcels sent either by Priority Mail Express and Priority Mail that have been found to contain illegal controlled substances and the proceeds from drug sales.

II. EVIDENCE SUPPORTING MY BELIEF THAT GREENBERG IS DISTRIBUTING METHAMPHETAMINE

9. Since February 13, 2019, I have been involved in an ongoing criminal investigation into the activities of several individuals, both known and unknown, including, among others, Brandon GREENBERG (“GREENBERG”) for drug trafficking and money laundering activities in violation of the Target Offenses. More specifically, I believe that GREENBERG is shipping and causing to be shipped via the United States mail parcels containing methamphetamine from Arizona to Massachusetts, where the parcels are received by two individuals, whom I will refer to as “Individual-1” and “Individual-2.”¹ Individual-1 and Individual-2 distribute the methamphetamine to various customers in and around the greater

¹ As will be discussed below, Individual-1 and Individual-2 are in a romantic relationship and live together. I am aware of both of their names, but am not disclosing it at this time in order to protect both Individual-1 and Individual-2 from retaliation by GREENBERG or others acting in concert with GREENBERG.

Boston metropolitan area. Thereafter, Individual-1 and Individual-2 send the proceeds from their sales of methamphetamine back to GREENBERG in Arizona (by various means, including via Western Union and the USPS) in order to obtain additional quantities of methamphetamine.

10. As will be discussed, Individual-1 and Individual-2 are now cooperating with the investigation and have confirmed that they were receiving methamphetamine from GREENBERG in Phoenix via the United States mail and that they were sending money back to GREENBERG to purchase additional methamphetamine.

GREENBERG Has Mailed Numerous Suspicious Parcels Believed to Contain Methamphetamine from Phoenix, Arizona to Individual-1 and Individual-2 in Massachusetts

11. As part of this investigation, I have reviewed USPS records and identified more than 20 suspicious parcels that were mailed via either Priority Mail or Priority Mail Express from the Phoenix, Arizona area to Individual-1 or Individual-2 at two different addresses in Massachusetts. These parcels weighed between approximately .31 pounds and six pounds. Each of the parcels bore handwritten mailing labels, and each was addressed from an individual to an individual. To the extent that sender information was available for these suspicious parcels, I have determined that the sender information (*i.e.*, the sender name and/or the sender address) listed on the parcels was typically fictitious.² I have obtained security camera footage from the various post offices in Phoenix, Arizona where many of the suspicious parcels were mailed. From that security camera footage, I have determined that GREENBERG was the sender of at least 17 of the suspicious parcels.

² I determined this by conducting an internet query of the sender information using the online database known as Clear and/or checking USPS databases. Clear is an investigative platform that searches proprietary sources and public records to obtain information on individuals and businesses.

12. Four of the suspicious Priority or Priority Mail Express parcels were addressed to Individual-1 at a residential address (“Address-1”) in Boston, Massachusetts.³ These parcels were mailed from Phoenix between late November 2018 and mid-February 2019. Seventeen of the suspicious Priority or Priority Mail Express parcels were addressed to Individual-2 at a residential address (“Address-2”) in Somerville, Massachusetts. These parcels were mailed from Phoenix between late-February 2019 and July 2019. According to USPS records, both Individual-1 and Individual-2 completed a change of address with the USPS on February 23, 2019, officially changing their address from Address-1 in Boston, Massachusetts to Address-2 in Somerville, Massachusetts.

13. In April 2019, I obtained and executed a federal search warrant for one of the suspicious parcels sent from Phoenix, Arizona addressed to Individual-2 at Address-2 in Somerville, Massachusetts. The parcel contained two Ziploc-style bags, one wrapped in a small blanket and the other secreted inside a stuffed bunny rabbit. The bags contained a combined total of approximately 936 grams of crystal-like substance that was field-tested with presumptive positive results for methamphetamine. Hereinafter, I will refer to this seized parcel as “the April 2019 Seized Methamphetamine Parcel.”

14. The April 2019 Seized Methamphetamine Parcel bore a return address of “Adrian Valencia, 461 N Pecos Road, Phoenix, AZ 85008.” Using Clear and USPS databases, I determined that this sender is not a valid address. USPS records indicate that two of the suspicious parcels addressed to Individual-1 at Address-1 in Boston, Massachusetts bore the

³ USPS records indicate that there were other Priority Mail and/or Priority Mail Express parcels sent from Phoenix, Arizona to Address-1 in Boston, Massachusetts during this time period. However, because the labels are not available, I do not know who was listed as the addressee on these parcels.

same fictitious return address information appearing on the April 2019 Seized Methamphetamine Parcel. Additionally, USPS records indicate that five other suspicious parcels addressed to Individual-2 at Address-2 in Somerville, Massachusetts bore the same fictitious return address (albeit with different zip codes) as the April 2019 Seized Methamphetamine Parcel.

15. Of the 17 parcels that Post Office security camera footage indicates that GREENBERG mailed to Individual-1 and Individual-2, seven of those parcels bore the same sender name and sender address (albeit with different zip codes) as the April 2019 Seized Methamphetamine Parcel. I have also determined that a credit card in GREENBERG's name was used to pay the postage for at least eight of the 17 suspicious parcels.

16. From my review of security camera footage from the Post Office in Phoenix, Arizona where the April 2019 Seized Methamphetamine Parcel was sent, I determined that GREENBERG was not the sender of the April 2019 Seized Methamphetamine Parcel. Nonetheless, I believe that GREENBERG had a role in the shipment of the methamphetamine contained within the April 2019 Seized Methamphetamine Parcel. First, as will be discussed, Individual-1 and Individual-2 have confirmed that GREENBERG was their Phoenix, Arizona-based supplier of methamphetamine and that a package of methamphetamine that they ordered from GREENBERG in April 2019 was never received. I believe that this missing package was the April 2019 Seized Methamphetamine Parcel. Second, I have determined that GREENBERG uses telephone number 480-242-4595, which is a Sprint cellular telephone. Sprint records indicate that the subscriber is Barry Greenberg, whom I believe to be GREENBERG's father. The billing address for this telephone is 221 East Mountain Sky Avenue, Phoenix, Arizona, which according to the Arizona Department of Transportation is the address appearing on GREENBERG's driver's license. Sprint toll records for this number indicate that, on April 18,

2019, this cellular telephone was used to call the USPS Customer Care line (800-275-8777). USPS records indicate that on April 18, 2019, an individual who identified himself/herself as “Casey Valencia” called the USPS Customer Service line to check on the status of the April 2019 Seized Methamphetamine Parcel and provided a call back number of 480-242-4595.

17. On February 14, 2019, I did a controlled delivery of two of the suspicious parcels addressed to Individual-1 at Address-1 in Boston, Massachusetts. Both of these parcels bore the fictitious return address information (“Adrian Valencia, 461 N. Pecos Road, Phoenix, Arizona”) that appeared on the April 2019 Seized Methamphetamine Parcel. Security camera footage from the Post Office in Phoenix, Arizona where both parcels were mailed reflects that GREENBERG sent both parcels. Individual-1 accepted receipt of both parcels.

18. On May 14, 2019, I did a controlled delivery of a suspicious parcel addressed to Individual-2 at Address-2 in Somerville, Massachusetts. This parcel listed the sender as “Emilio Cooper, 7429 Desert Run Drive, Phoenix, Arizona 85021.” Using Clear and USPS databases, I determined that the sender address is not a valid address. Security camera footage from the Post Office in Phoenix, Arizona where the parcel was mailed reflects that GREENBERG sent the parcel. Individual-2 accepted delivery of this parcel.

Evidence Establishing that Individual-1 and Individual-2 Sent Proceeds from their Drug Sales Back to GREENBERG in Phoenix, Arizona To Buy More Methamphetamine

19. I have also obtained evidence that I believe establishes the flow of money back from Individual-1 and Individual-2 in Massachusetts to GREENBERG in Arizona. Western Union records indicate that Individual-2 sent payments to GREENBERG on the following dates:

- December 13, 2018: \$1,000
- December 18, 2018: \$1,000
- December 22, 2018: \$1,000

- January 31, 2019: \$500
- February 3, 2019: \$2,650.

20. From USPS records, I have also identified five Priority Mail Express parcels that, between January 22, 2019 and May 15, 2019, were sent from Massachusetts to Phoenix, Arizona that I believe contained payments for additional drugs. All five of these parcels were addressed for delivery to “4762 E. Portland Street, Phoenix, Arizona 85008,” and four of the five parcels listed GREENBERG as the intended recipient. (I was not able to locate a label for the fifth parcel.) Three of the five parcels also listed 480-242-4595 as the recipient’s telephone number. Four of the five parcels listed sender information that I believe is associated with Individual-1 and/or Individual-2.

July 2019: Controlled Delivery of a Suspicious Parcel Mailed by GREENBERG Addressed to Individual-2 and the Subsequent Identification of GREENBERG by Individual-1 and Individual-2 as their Phoenix, Arizona-based Supplier of Methamphetamine

21. On July 23, 2019, I located another suspicious parcel sent from Phoenix, Arizona that was addressed to Individual-2 at Address-2 in Somerville, Massachusetts. This parcel weighed approximately 3.5 pounds and bore a handwritten shipping label. The return address listed was “Casey Valencia, 62216 Pecos Road, Phoenix, AZ 85261,” which, based upon my queries of USPS databases, I believe is a fictitious address. From my review of the footage from the security cameras at the Phoenix, Arizona Post Office where this suspicious parcel was mailed, I believe that GREENBERG shipped this parcel.

22. I attempted to do a controlled delivery of this suspicious parcel. I marked the parcel with the date, and then took the parcel to Address-2 in Somerville, Massachusetts. I knocked on the door of the apartment listed on the mailing label. When nobody answered, I left the parcel at the door.

23. Later on July 23, 2019, law enforcement officers executed a state search warrant at Address-2 in Somerville, Massachusetts. During the execution of the search warrant, officers seized a small amount of white crystal-like substance that officers believe was methamphetamine based upon the substance's physical appearance and the officers' experience in investigating controlled substances cases. Officers also seized \$5,300 in U.S. currency. In the trash room in the basement of the apartment building, agents recovered the empty parcel that I delivered to the residential apartment listed on the mailing label earlier that day. The mailing label had been removed, but the markings I had placed on the box were still present.

24. During execution of the search warrant, law enforcement officers interviewed both Individual-1 and Individual-2. Both individuals were advised of their *Miranda* rights and agreed to speak with law enforcement officers and cooperate with the investigation.

25. Individual-1 and Individual-2 acknowledged that they are in a romantic relationship, that they live together at Address-2 in Somerville, Massachusetts, and that they previously lived at Address-1 in Boston, Massachusetts. Individual-1 has previously been convicted of various state offenses, including firearms, drug distribution, and unlawful wounding. Individual-1 has pending state charges related to the illegal possession of ammunition and possession of Schedule 1V [Controlled Substance].⁴ Individual-1 has several dismissed state charges, including assault with a dangerous weapon, threatening, malicious destruction of property, carrying a dangerous weapon, and possession of a Burglariou Instrument. Individual-1 is also a regular user of methamphetamine and marijuana. Individual-2 has pending state charges including carrying a dangerous weapon and possession of a Class B

⁴ In connection with the ongoing investigation, Individual-1 was recently charged in federal court with being a felon-in-possession of a firearm.

Controlled Substance (Methamphetamine). Individual-2 also uses methamphetamine, cocaine, and other controlled substances.

26. Both Individual-1 and Individual-2 were informed that they were targets of an ongoing federal investigation concerning the interstate distribution of methamphetamine via the mail and both agreed to cooperate in the hopes of lessening their respective sentencing exposure. To the extent possible, I have corroborated the information provided by Individual-1 and Individual-2 through various means, including through review of video surveillance footage, and the review of various business records. Based upon this corroboration, I believe that both Individual-1 and Individual-2 are accurate and reliable sources of information.

27. Individual-1 admitted that Individual-1 and Individual-2 were receiving packages of methamphetamine in the mail. Among other things, Individual-1 identified GREENBERG as their Phoenix, Arizona-based methamphetamine supplier. Individual-1 stated that GREENBERG had sent a package of methamphetamine in April 2019 that was to be delivered to Address-2 in Somerville, Massachusetts, but was never received. Individual-1 confirmed that the suspicious parcels discussed above contained methamphetamine, as did the parcel that I left at the doorway on July 23, 2019. Individual-1 stated that Individual-1 had never met GREENBERG and that communications with GREENBERG were conducted over the encrypted communications application Signal. Individual-1 further admitted that Individual-1 and Individual-2 sent money back to GREENBERG for the purpose of obtaining additional methamphetamine.

28. Individual-1 gave consent for law enforcement officers to search Individual-1's cellular telephone. A preliminary review of Individual-1's cellular telephone has a contact for a "Brandon Valentine" in the encrypted application with a contact picture that I recognize as being GREENBERG's photograph. The contact telephone number listed for "Brandon

Valentine” is 480-242-4595, which, as discussed above, I believe is GREENBERG’s cellular telephone number.

29. Individual-2 also confirmed that the suspicious parcels described above that were sent from Phoenix, Arizona contained methamphetamine. Individual-2 further identified GREENBERG as the Arizona-based supplier for Individual-1 and Individual-2. Individual-2 stated that GREENBERG often uses the first name “Adrian.” (From my review of USPS records, I have determined that the first name “Adrian” has appeared as the sender name on more than ten of the suspicious parcels sent from Phoenix, Arizona to Individual-1 and/or Individual-2, including on the April 2019 Seized Methamphetamine Parcel.) Individual-2 further confirmed that Individual-2 had sent money back to GREENBERG for the purpose of obtaining additional methamphetamine from GREENBERG.

July/August 2019: Controlled Purchase of Approximately One Pound of Methamphetamine from GREENBERG

30. On July 29, 2019, Individual-2, acting under law enforcement supervision, used Individual-1’s telephone to contact “Brandon Valentine” (GREENBERG) via the encrypted communications application Signal. Individual-2, acting as Individual-1, informed GREENBERG that they were going to send money to GREENBERG via the U.S. mail that day (“*We are going to send you cash in the mail.*”). Individual-2 informed GREENBERG that the cash would include the final payment for the parcel that I delivered on July 23, 2019, and additional money as the front end payment on a new pound of methamphetamine (“*I’m gonna send the last 200 plus the deposit for the next one overnight. You’ll get it tomorrow.*”).

31. I then arranged for \$2,500 in U.S. currency to be sent in parcel via USPS Priority Express Mail. The parcel bore tracking number EL749142860US. Individual-2 used Signal on Individual-1’s phone to inform GREENBERG of the parcel’s tracking number. The parcel was

addressed to “Brandon Greenberg, 4762 E. Portland Street, Phoenix, AZ 85008.” On July 30, 2019, a Postal Inspector in Phoenix, acting in an undercover capacity as a letter carrier, delivered the parcel bearing USPS Priority Express Mail tracking number EL749142860US to 4762 E. Portland Street, Phoenix, AZ 85008 and handed the parcel to GREENBERG.

32. On July 30, 2019, GREENBERG used Signal to confirm receipt of the parcel and preparation of a parcel containing methamphetamine (“*Got it. Boxing it up and getting out after I make and eat dinner.*”) On July 31, 2019, GREENBERG used Signal to verify the address where he was sending the methamphetamine parcel (“*I’m still mailing to the same address right?*”). Individual-2 used Individual-1’s phone to confirm the mailing address. GREENBERG responded, “*K cool. Yep you will have it tomorrow.*”

33. On July 31, 2019, surveillance officers via video surveillance observed GREENBERG exit 4762 E. Portland Street, Phoenix, AZ 85008 carrying a brown box. Surveillance officers using video surveillance later observed GREENBERG mailing what appeared to be the same brown box. This brown box bore a handwritten USPS Priority Express Mail label and tracking number EJ024659985US. The parcel was addressed to Individual-2 at Address-2 in Somerville, Massachusetts and bore a return address of “Cassidy Davis, 6155 North Scottsdale Road, Scottsdale, AZ 85251.”⁵

34. On August 1, 2019, I located the brown parcel bearing USPS Priority Express Mail tracking number EJ024659985US. I opened the parcel and found it to contain approximately 486 grams of a crystal-like substance that field-tested presumptive positive for methamphetamine. The methamphetamine was vacuum-sealed and hidden inside three boxes of breakfast cereal. Upon further inspection of the parcel, I determined that GREENBERG re-used

⁵ Through a query of USPS databases and CLEAR, I determined that while the return address is real, there is no record of an individual named Cassidy Davis at that address.

a box to ship the methamphetamine as inside the box was a shipping label listing the following as the addressee: “Brandon Greenberg, 4762 E. Portland Street, Phoenix, AZ 85008.”

CONCLUSION


35. Based upon the evidence set forth above, I submit that there is probable cause to believe that beginning on a date unknown but not later than in or about November 2018, and continuing through on or about July 31, 2019, in Boston and Somerville, in the District of Massachusetts, and elsewhere, Brandon GREENBERG, a/k/a “Adrian,” conspired with others known and unknown to knowingly and intentionally distribute and possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A)(viii).

Respectfully submitted,



CHRISTOPHER J. MULLEN
Postal Inspector
United States Postal Inspection Service

Subscribed to and sworn before me this
on the 7th day of August 2019.



HON. JENNIFER C. BOAL
United States Magistrate Judge
District of Massachusetts

