

UNITED STATES DISTRICT COURT
for the
Eastern District of Kentucky

United States of America
v.



Case No.
6:22-MJ-6068-HAI

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 25, 2022 in the county of Pulaski, Rockcastle, Fayette in the Eastern District of Kentucky, the defendant(s) violated:

Table with 2 columns: Code Section (21 U.S.C. §§ 846, 841(a)(1)) and Offense Description (Conspiracy to distribute 500 grams or more of a mixture of substance containing a detectable amount of methamphetamine, a Schedule II controlled substance (Between on or about January of 2022 and August 25, 2022 in Pulaski, Rockcastle, and Fayette Counties))

This criminal complaint is based on these facts:

See attached affidavit of DEA Special Agent Matthew D. Fackler

Continued on the attached sheet.

/s/ Matthew D Fackler w p b Hanly A Ingram
Complainant's signature

Matthew D. Fackler, DEA Special Agent
Printed name and title

Attested per Rule 4.1(b)(2)(A).

Sworn to before me and signed in my presence.

Date: Aug 26, 2022

Judge's signature (Handwritten signature of Hanly A. Ingram)

City and state: London, KY

Hanly A. Ingram, U.S. Magistrate Judge
Printed name and title

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
SOUTHERN DIVISION
LONDON**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

Your Affiant, Matthew D. Fackler, a Special Agent (SA) with the Drug Enforcement Administration (DEA), having been duly sworn, state as follows:

1. Your Affiant is a law enforcement officer of the United States, within the meaning of 18 U.S.C. § 250(7), and am empowered by law to conduct investigations of and to make arrest for offense enumerated in 18 U.S.C § 2516.
2. I am a Special Agent (SA) employed by the United States Department of Justice, Drug Enforcement Administration (DEA), currently assigned to the DEA's London, Kentucky, Resident Office (LRO). I have been a Special Agent with the DEA for approximately five (5) years. I am empowered by law to conduct investigations of controlled substance offenses as well as related criminal acts, such as money laundering and firearms offenses. I have received training from the DEA regarding the investigation of these types of offenses.
3. Prior to working for the DEA, I was employed by the Metropolitan Nashville Police Department (MNPd) for approximately eight (8) years as a sworn police officer. During this time, my primary responsibilities were the investigation of street to mid-level drug trafficking violations.
4. In addition to the DEA Basic Agent Academy, I have received training in the investigation of complex drug conspiracy investigations, money laundering violations,

undercover operations, and the use of electronic devices, to include cellular telephones and Global Positioning System tracking devices, in the commission of drug offenses. I have also attended regional seminars regarding current drug trends.

5. During the course of my law enforcement experience, I have participated in numerous state and federal narcotics investigations. Through such investigations, I have been involved with the interviewing/debriefing of witnesses, cooperating sources of information, and defendants regarding the modus operandi of drug traffickers. I have participated in investigations which utilized electronic monitoring, pen registers/trap and trace (pen/trap) devices, telephone toll analyses, document analyses, witness interviews, surveillance, controlled-purchases of narcotics (utilizing cooperating sources), the execution of both federal and state search warrants, and the consensual searches of persons, premises, and vehicles utilized by drug traffickers. I have also participated in prior investigations, which involved the use of wire and electronic intercepts. Through these investigations, my training and experience, and conversations with other experienced agents and law enforcement personnel, I have become familiar with the methods used by traffickers to transport and safeguard narcotics, to distribute narcotics, and collect and launder related proceeds. I am aware of the sophisticated tactics they routinely use to attempt to thwart any investigation of their narcotics organizations. My knowledge of these tactics has been particularly useful and relevant in these investigations.
6. I am submitting this Affidavit in support of Criminal Complaints alleging [REDACTED] [REDACTED] and [REDACTED] [REDACTED] conspired together to distribute 500 grams or more of a mixture of substance containing a detectable amount of methamphetamine, a schedule II controlled

substance and that [REDACTED] did knowingly and intentionally commit the crime of possession with the intent to distribute controlled substances, including 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, a violation of Title 21, U.S.C., § 841(a)(1).

7. Beginning in January 2022, the Somerset Police Department (SPD), with the assistance of the Drug Enforcement Administration (DEA), initiated a criminal investigation into [REDACTED] [REDACTED] who was identified by sources of information as a large-scale methamphetamine trafficker in the Pulaski County area of Kentucky. Through this investigation, it was determined that Letner's source of supply (SOS) for methamphetamine and heroin was identified as [REDACTED] [REDACTED] who was operating out of Lexington, KY.
8. Along with other law enforcement officers, January 18, 2022, I met with a source of information (SOI) pertaining to intelligence regarding [REDACTED]. Though not revealed in this Affidavit, the identity of the SOI is known to me. The SOI knows [REDACTED] to purchase two to four (2-4) pounds of crystal meth from a white female in Lexington, KY, and that she charges [REDACTED] \$3,400 per pound. On one occasion, the SOI stated that he/she drove [REDACTED] to meet the SOS in Lexington at an apartment complex to conduct the drug transaction. The SOI stated that [REDACTED] stored his drugs with the SOI and the SOI was allowed to sell the drugs for [REDACTED] and to make personal profit.
9. On March 22, 2022, TFO Nelson and I met with the SOI at a secure location regarding intelligence about the [REDACTED] DTO. The SOI advised [REDACTED] was still meeting his female SOS in Lexington, KY. [REDACTED] told the SOI to "come see him" and that he ([REDACTED] had a

quantity of crystal meth for him (SOI). The SOI advised that [REDACTED] stores his drugs at his primary residence located in Science Hill, KY (Pulaski County).

10. On March 22, 2022, I conducted an interview with DEA confidential source (CS) identified as CS-22-166314, herein after referred to as CS, regarding the drug trafficking activities of [REDACTED] [REDACTED]. Though not named herein, the identity of this CH is known to me. The CS stated that he/she purchased 1-ounce quantities of crystal meth from [REDACTED] [REDACTED] every 2-3 days for the past 2 and ½ months. The CS stated that he/she has conducted drug transactions with [REDACTED] at his residences in Science Hill, KY and in Bronston, KY (Pulaski County). The CS stated that he/she knows Letner's SOS to be a female in Lexington, KY. The CS reported that the most he/she has seen [REDACTED] possess was two (2) pounds of methamphetamine at the Bronston, KY, residence approximately 1 and 1/2 months prior to this interview.
11. On March 23, 2022, the CS conducted a successful controlled purchase of one (1) ounce of crystal methamphetamine from [REDACTED] [REDACTED]. On this date, the CS traveled from the secure meeting location to Letner's residence in Bronston, KY. The CS was observed entering the residence with [REDACTED] and several minutes later the CS was observed exiting the residence. Upon returning to the secure location, the CS transferred custody of approximately one (1) ounce of crystal meth to Det. Walters. The CS paid \$400 of official advanced funds (OAF) to [REDACTED] in exchange for the one (1) ounce of meth.
12. On April 25, 2022, a cell phone ping (authorized by a Kentucky State Court) was executed on Verizon Wireless pertaining to the phone number utilized by [REDACTED] [REDACTED] identified as 606-305-0159. Both the SOI and the CS referenced in this Affidavit identified this phone number as being the number that they knew to be the phone number

used by [REDACTED] [REDACTED]. The Ping had an authorization period for thirty (30) days. During that time period, the ping indicated that [REDACTED] made multiple trips to Lexington, KY. These Pings generally reveal quick trips from Pulaski County to Lexington and back to Pulaski County that, in my training and experience, are indicative of drug trafficking.

13. On July 14, 2022, TFO Nelson executed a Kentucky state search warrant for a GPS trafficking device on [REDACTED] Letner's vehicle identified as a black Nissan 370z bearing KY license plate [REDACTED]. Law enforcement knows [REDACTED] to drive this vehicle because law enforcement officers have observed [REDACTED] driving the vehicle during surveillance operations. Additionally, both the SOI and CS referenced in this Affidavit have identified this vehicle as a vehicle driven by [REDACTED]. Additionally, I have reviewed records that indicate that this vehicle is registered to [REDACTED].
14. Throughout this investigation, it has been determined through cellular telephone analysis, sources of information, confidential sources, and physical surveillance that Letner's SOS is identified as [REDACTED] [REDACTED] who resides in an apartment off Alumni Drive in Lexington, KY. Additionally, [REDACTED]'s vehicle is identified as a black Chevrolet Malibu bearing Kentucky license plate [REDACTED]. Law enforcement knows [REDACTED] to drive this vehicle because law enforcement officers have observed [REDACTED] driving the vehicle during surveillance operations. Additionally, I have reviewed records that indicate that this vehicle is registered to [REDACTED].
15. On July 29, 2022, the CS contacted SA Fackler and advised that [REDACTED] [REDACTED] was intending on traveling to Lexington, KY, to meet his SOS, and conduct a drug transaction before 12:00pm. On this date, members of the DEA Lexington Resident Office and DEA London Resident Office conducted surveillance on [REDACTED] [REDACTED] at the Alumni Drive

residence. Agent's observed [REDACTED] exit her residence carrying a toddler and enter her black Chevy Malibu, before exiting the parking lot. The GPS tracker did not show [REDACTED] traveling to Lexington, KY, on this date.

16. On July 31, 2022, Letner's GPS tracking device revealed that Letner traveled to Lexington and parked at the Taco Tico restaurant parking lot at the intersection of Man O' War Blvd and Pimlico Pkwy, Lexington, KY, near [REDACTED]'s residence. The GPS tracking device displayed that upon Letner's return from Lexington, KY, his vehicle arrived back at Letner's Science Hill residence. On August 2, 2022, SA Fackler and SA Rogers met with Store Manager of the Walgreen's located off of Pimlico Pkwy in Lexington, KY. The store manager provided agents with surveillance video from the Walgreens of a time period between 3:40 P.M. and 3:55 P.M. During this time period, surveillance video shows [REDACTED] vehicle entering the parking lot and driving towards the direction of where the GPS tracker shows [REDACTED] vehicle to be stationary (parked) in the parking lot, just out of camera view. At 3:52 P.M. the surveillance cameras show [REDACTED] vehicle exiting the parking lot. At 3:54 P.M., the surveillance cameras show [REDACTED] vehicle exiting the parking lot. Pertaining to this trip to Lexington, the CS later advised agents that [REDACTED] purchased five (5) pounds of crystal meth from his SOS.

17. On August 9, 2022, the CS advised law enforcement that [REDACTED] told the CS that he was traveling to his SOS on this date. At approximately 2:00 P.M., SA Fackler observed that the GPS tracking device reporting that Letner's vehicle was traveling north on Hwy 27 from Letner's Science Hill residence. SA Fackler contacted Lexington Resident Office TFO Travis Steward and advised of Letner's movement toward Lexington. SA Fackler

and TFO Steward continued to communicate regarding Letner's location according to the GPS tracking device.

18. On the same date at approximately 3:30 P.M., the GPS tracking device showed Letner's vehicle to be stationary at an apartment complex (Parkhill Apartment Complex). At approximately 4:16 P.M., TFO Steward advised that he observed [REDACTED] exit her Alumni Drive Apt. 612 residence carrying a tan handbag and small child, placing the bag and child in her vehicle, and exiting where her vehicle was parked. Shortly thereafter, TFO Steward advised that he located [REDACTED] and [REDACTED] vehicle in the Park Hill Apartments, and the vehicles were parked next to each other. TFO Steward stated that he observed [REDACTED] in the passenger seat of [REDACTED] vehicle and that when [REDACTED] exited the vehicle, he was carrying the same tan handbag that [REDACTED] was carrying when she exited her residence. TFO Steward advised that both vehicles then departed the parking lot. Surveillance was not continued on [REDACTED] as he departed. TFO Zach Travis advised that he observed [REDACTED] park in front of her residence and exit her vehicle carrying a blue handbag, retrieve her small child, and then enter her residence in Apartment 612.
19. On August 10, 2022, the CS reported to SA Fackler that he/she arrived at [REDACTED] residence on the evening of August 9, 2022, and observed 8-9 pounds of crystal meth and an unknown quantity of heroin and molly. The CS stated that there was heavy traffic of customers purchasing drugs from [REDACTED] while the CS was present. The CS stated that small children of the customers were present during the drug transactions.
20. On August 11, 2022, TFO Nelson obtained a signed search warrant authorizing an extension on the GPS tracker for Letner's Nissan 370z. The search warrant was signed by Judge Kathryn Slone of Pulaski County District Court

21. On August 11, 2022, the CS conducted a successful controlled buy of one (1) ounce of methamphetamine from [REDACTED] at his address in Bronston, KY. After the transaction, the CS transferred custody of approximately one (1) ounce of crystal meth to law enforcement in which the CS received up front or on credit from [REDACTED] without having to provide payment on this date.
22. On August 13, 2022, SA Fackler observed the GPS tracking device on [REDACTED] vehicle begin traveling from the Science Hill address towards Lexington and stop in the parking lot of Taco Tico restaurant located at the intersection of Man O' War and Pimlico Pkwy in Lexington, KY, near Allen's residence. Several minutes later, SA Fackler observed the GPS tracker show [REDACTED] vehicle leave the parking lot and briefly travel to Park Hill Apartments before exiting the parking lot and traveling South towards Pulaski County, KY, and ultimately stopping at Letner's Science Hill residence. On August 15, 2022, SA Fackler and TFO Nelson met with Walgreens manager at the Walgreens located at 3120 Pimlico Pkwy Ste 178, Lexington, KY. The manager allowed agents to observe the surveillance videos from August 13, 2022. Agents observed that on this date, Letner's vehicle entered the parking lot several minutes before Allen's vehicle enters the parking lot. Shortly thereafter, the surveillance video shows [REDACTED] and Allen's vehicles exit the parking lot together. This surveillance video in conjunction with data from the GPS tracking device, indicate that [REDACTED] and [REDACTED] met at the Walgreens parking lot and then traveled to the Park Hill Apartments together. The nature and brevity of this meeting, in my training and experience and in the context of this investigation, is consistent with a drug transaction.

23. On August 17, 2022, the CS conducted a successful controlled buy walk of one (1) ounce of crystal methamphetamine from [REDACTED] at the Science Hill, KY residence. After the transaction, the CS transferred custody of approximately one (1) ounce of crystal meth to law enforcement in which the CS paid \$800 of OAF for the one (1) ounce of meth and for the one (1) ounce of meth received by the CS on August 11, 2022.
24. On August 25, 2022, the CS advised SA Fackler that according to [REDACTED] his SOS stated that the shipment was “out for delivery,” indicating that drugs were being shipped to the SOS through a mail carrier. On this date at approximately 12:00 P.M., SA Fackler observed the GPS tracking device display [REDACTED]’s vehicle traveling towards Lexington, KY. Lexington DEA established surveillance at [REDACTED]’s residence and observed her vehicle parked in front. At 1:36 P.M., SA Jason Moore reported that [REDACTED] was observed exiting her residence carrying a brown bag and child car seat to her vehicle, then returning to retrieve her infant child and diaper bag before entering her vehicle and departing the parking lot at 1:42 P.M. At 1:45 P.M., the tracking device displayed Letner’s vehicle park in the Target parking lot located off Pavilion Way in Lexington, KY. SA Douglas I. Dalrymple confirmed [REDACTED]’s location by establishing visual surveillance.
25. At approximately 1:55 P.M. on this date, agents observed [REDACTED] and [REDACTED] meet at the Target parking lot. [REDACTED] was observed exiting his vehicle and entering [REDACTED]’s passenger seat. At approximately 2:09 P.M., Letner was observed exiting [REDACTED]’s vehicle carrying a brown bag, similar to the brown bag [REDACTED] was observed carrying to her vehicle from her residence, and enter his vehicle before departing the Target.

26. At approximately 3:05 P.M., Laurel County Sheriff's Deputy Justin Taylor assisted by Kentucky State Police (KSP) conducted a traffic stop on [REDACTED] near 1240 Richmond St, Mt. Vernon, KY. A probable cause search of the vehicle based on a KSP K-9 alert to the odor of narcotics within the vehicle, proved to find a brown paper bag containing approximately four (4) pounds of suspected methamphetamine and one (1) ounce of suspected fentanyl. In my training and experience, I have become familiar with the physical characteristics of methamphetamine. The officers conducting the traffic stop have described the suspected methamphetamine to me and that description matches what I know to be the physical characteristics of methamphetamine. Other DEA Task Force Officers on the scene have also communicated to me that, based on the physical characteristics of the suspected methamphetamine, that they believe that it is, in fact, methamphetamine. The weight of the suspected methamphetamine was determined by weighing the substance at the DEA London Resident Office. Further formal testing and weighing of the methamphetamine is expected to occur when the substance is submitted to the DEA Laboratory in the future.
27. On this same date, Lexington DEA made contact with [REDACTED] and located a large amount of U.S. currency in her possession (a formal, official count of that currency has not net occurred). The nature and amount of the seized cash is consistent, based on my training and experience and contextual knowledge of this investigation, with drug proceeds from the sale of controlled substances. Agents then executed a search warrant at [REDACTED]'s apartment located off of Alumni Drive in Lexington, KY. [REDACTED] advised that she and her 11-month-old child are the only residents of this apartment. A search of the residence proved to find in the master bedroom dresser drawer an assortment of controlled

substances to include individually wrapped plastic baggies containing suspected methamphetamine, suspected heroin/fentanyl, suspected cocaine, blue pills suspected to contain fentanyl, and a 9mm loaded semi-automatic handgun. Two (2) additional handguns were located in the master bedroom closet. Approximately five additional pills suspected to be fentanyl and additional undetermined amount of U.S. currency were also located in the residence.

28. Based on the information provided in this Affidavit, I believe that there is probable cause that [REDACTED] and [REDACTED] did knowingly and intentionally commit the crime of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance. I also believe that there is probable cause that [REDACTED] did knowingly and intentionally commit the crime of possession with the intent to distribute controlled substances, including 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, U.S.C., § 841(a)(1).

/s/ Matthew D. Fackler w.p.b. Hanly A. Ingram
Matthew Fackler, Special Agent
Drug Enforcement Administration

Attested remotely per Rule 4.1(b)(2)(A) this 26th day of August, 2022.



Honorable Hanly A. Ingram
United States Magistrate Judge
Eastern District of Kentucky