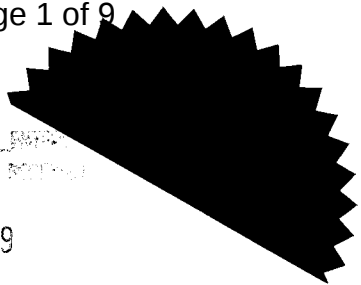


TPW: USAO 2019R00010

FILED _____
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
FEB 14 2019

ATTEST
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

CHRISTOPHER PAUL HASSON,

Defendant

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CASE NO. GLS-19-63

FILED UNDER SEAL

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

Your affiant, Alexandria Marie Thoman, Special Agent with the Federal Bureau of Investigation, being duly sworn, deposes and states as follows:

Introduction and Background

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"). As such I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws. I have been a Special Agent with the FBI for approximately two years, prior to which I spent approximately four years in the Bureau of Counterterrorism at the U.S. Department of State. During my tenure with the FBI and the State Department, I have investigated and participated in the investigations of numerous international and domestic terrorism violations and, among other things, have conducted or participated in surveillances, debriefings of informants, reviews of taped conversations and records, and the executions of search and tracking warrants.

2. I submit this Affidavit in support of a criminal complaint and arrest warrant. Based on the facts in this affidavit, I respectfully submit that there is probable cause to believe that **CHRISTOPHER PAUL HASSON ("HASSON")** has committed violations of 18 U.S.C.

§ 922(g)(3) (possession of firearm and ammunition by unlawful user or addict of any controlled substance) and 21 U.S.C. § 844 (simple possession of Tramadol, a Schedule IV controlled substance) (“TARGET VIOLATIONS”).

3. This Affidavit is based upon my participation in the investigation, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this Affidavit is being submitted for the limited purpose of obtaining a criminal complaint and arrest warrant, it does not include all the facts that I have learned during the course of this investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated. In making this application, I am relying only on the facts stated herein.

4. Information in this Affidavit resulting from surveillance does not always set forth my personal observations, but rather at times reflects information from video surveillance, as well as information provided to me by other law enforcement agents who observed the events described and to whom I have spoken or whose reports I have read.

Information Regarding the Target Email Facilities

5. Records provided by AT&T show that **HASSON** has been the subscriber for TARGET EMAIL-1 since August 4, 2008. Also, **HASSON** listed TARGET EMAIL-1 as his “home e-mail address” on an SF-86 federal government form that **HASSON** completed on or about February 5, 2016.

6. Records provided by Google show that **HASSON** has been the subscriber for TARGET EMAIL-2 since February 13, 2016.

7. TARGET EMAIL-3 is an email account used by **HASSON**’s narcotics supplier.

8. As part of this investigation, law enforcement agents have obtained federal search

warrants for TARGET EMAIL-1, TARGET EMAIL-2, and TARGET EMAIL-3. Certain information from those warrants is included in this affidavit.

Facts Establishing Probable Cause

9. **HASSON** is a Lieutenant in the United States Coast Guard, and currently assigned to the United States Coast Guard Headquarters, Washington, D.C.

10. **HASSON** currently lives at a residence in Silver Spring, Maryland. Based on a review of information contained in **HASSON**'s Coast Guard email account, **HASSON** began his lease at his Silver Spring residence on June 1, 2016.

Possession of Firearms

11. As described below, **HASSON** has possessed firearms since at least late 2017.

12. According to records obtained from the holder of a Federal Firearms License ("FFL"), **HASSON** purchased a Springfield 1911 45ACP pistol for \$899.99 from a business in Cedar Bluff, Virginia, on October 1, 2017. In emails obtained from a search of TARGET EMAIL-1 dated March 25, 2018, **HASSON** admits that he owns a Springfield 1911, stating: "I have a Springfield range officer elite compact 1911 45 cal with 4 mags, holster etc. It was 1k new 6 months old." Attached to the email is a photograph with a firearm and four magazines. In the emails, **HASSON** is attempting to trade the firearm for what appear to be two other firearms.

13. In addition, in the records obtained for TARGET EMAIL-2, agents identified photos uploaded to TARGET EMAIL-2 on or about the following dates and which show the following: (a) a handgun, taken on or about November 13, 2017, and uploaded on or about December 1, 2017; (b) two long guns resting on a couch, taken on or about November 29, 2017, and uploaded on or about December 11, 2017; (c) a handgun and four magazines, taken on or about March 16, 2018 (which appears to be the same photo as the one referenced above from

TARGET EMAIL-1); and (d) a photograph of **HASSON**'s driver's license, taken on or about May 17, 2018. The carpet in the photos with the handgun and four magazines appears to be the same type of carpet from known pictures of the interior of **HASSON**'s apartment in Silver Spring, Maryland. And the wallboard in the photo of the long guns also appears to be the same type of wallboard from known pictures of the interior of **HASSON**'s apartment in Silver Spring, Maryland. Furthermore, according to Gmail records, each photo was uploaded from Internet Protocol ("IP") address 96.255.198.78. Records obtained from Verizon show that this IP address, from at least July 24, 2017, through May 20, 2018 (covering more than the entire timeframe during which the photos were uploaded) was assigned to a Verizon account located at the address of **HASSON**'s residence in Silver Spring, Maryland. The Verizon account is in the name of an individual whom I know rents the property to **HASSON**, based on monthly rental checks I have seen, as well as emails in which the individual seeks joint utility payments from **HASSON**.

14. The fact that **HASSON** owns at least one long gun is corroborated by an admission **HASSON** made in certain emails obtained from TARGET EMAIL-1. For example, in an email dated February 11, 2018, **HASSON** states: "I have a b14 hmr in 308 great gun. I am looking at getting ridge in 7mm will rem 700 long action stocks with the ridge in 7mm? Thanks." Based on my training and experience, and knowledge of this investigation, I know that a .308 rifle is a common type of rifle. As well, on February 15, 2018, based on records obtained from a business in Florida, **HASSON** purchased seven boxes of .308 ammunition for \$128.11. The ammunition was shipped by FedEx to **HASSON**'s residence in Silver Spring, Maryland.

15. **HASSON** also appears to have possessed a firearm prior to the October 1, 2017 purchase identified above and through at least late 2018. According to an email obtained from TARGET EMAIL-1, on May 29, 2017, **HASSON** signed up for the June 24, 2017, AAFG IDPA

Action Pistol Safety and Observation Class. Based on an open source search, I believe that AAFG is Anne Arundel Fish and Game Association, which identifies itself as “A Shooting Sports Club.” According to financial records obtained by subpoena, **HASSON** made purchases at “NRA RANGE” in Fairfax, Virginia, on December 27, 2017, and August 20, 2018. Based on my training and experience, and my knowledge of this investigation, I believe that “NRA RANGE” is a reference to the shooting range at the National Rifle Association headquarters in Virginia.

Tramadol Purchases

16. Since at least October 2016, **HASSON** has purchased Tramadol from an individual likely located in Mexico, though the final shipments appear to be sent from locations in California to addresses designated by **HASSON** (all but one of which was his home addresses in Maryland and North Carolina). Using TARGET EMAIL-1, as well as a Proton Mail address,¹ **HASSON** placed orders by sending emails to his supplier at TARGET EMAIL-3, specifically requesting that quantities of Tramadol (a Schedule IV controlled substance) be shipped for overnight delivery. Certain emails from TARGET EMAIL-3 (including one on March 27, 2018) explicitly referenced the offering for sale of Tramadol (“Tramadol 100mg 100 tabs \$150 Citra Brand”), as well as many other controlled narcotics, including Xanax, Suboxone, Oxycodone, Vicodin, Percoset, Dilaudid, Adderall, Morphine, and Ritalin.

17. The chart below summarizes records from prior email search warrants for TARGET EMAIL-1 and TARGET EMAIL-3, and information obtained by subpoenas to UPS, FedEx, MoneyGram, and Western Union. Though **HASSON** placed the orders by email to the user of TARGET EMAIL-3, the user of that email address directed **HASSON** to send payment to a different receiver for each shipment. Indeed, according to the user of TARGET EMAIL-3, the

¹ I know that Proton Mail is a Swiss-based encrypted email provider that advertises itself as “the world’s largest secure email service.”

receiver changes each day. Moreover, when the name is known, the person sending the narcotics to HASSON used a different name than the money recipients. Based on my training and experience, and my knowledge of this investigation, I believe this is evidence that the purchases are illegal, as there would be no legitimate reason to pay a lawful vendor by sending payments out of the country, by a money remitting service, to a different individual each day, and then have the Schedule IV narcotics sent by overnight delivery using the name of still another individual.

| Date Order Placed | Order | Payment | Payment Method | Recipient Location | Delivery Service | Tracking Number | Recipient | Recipient Address |
|-------------------|-----------------------------|---------|-----------------------------|--------------------|------------------|---|-----------|--------------------------------|
| 10/14/2016 | 100 Tramadol | \$215 | MoneyGram #64567953 | Tijuana, Mexico | UPS | 1zw616060207421422 | HASSON | North Carolina Residence |
| 12/21/2016 | 100 Tramadol | \$185 | Sharemoney #16367481622 | Tijuana, Mexico | UPS | 1zw616060141390466 | HASSON | North Carolina Residence |
| 2/13/2017 | 100 Tramadol | \$215 | Sharemoney #16367709477 | Tijuana, Mexico | UPS | 1zw94670193954592 | HASSON | North Carolina Residence |
| 4/2/2017 | 200 Tramadol / 300 Tramadol | \$385 | MoneyGram #94355173 | Tijuana, Mexico | UPS | 1za22w970126075864 / 1z7437490190170986 | HASSON | North Carolina Residence |
| 7/13/2017 | 300 Tramadol | \$520 | Moneygram #44362438 | Tijuana, Mexico | | | HASSON | Maryland Residence |
| 9/13/2017 | 300 Tramadol | \$520 | MoneyGram #80310311 | Tijuana, Mexico | | | HASSON | Maryland Residence |
| 11/14/2017 | 300 Tramadol | \$530 | MoneyGram #74888777 | Tijuana, Mexico | FedEx | 788474334474 | HASSON | Maryland Residence |
| 1/23/2018 | 300 Tramadol | \$520 | MoneyGram #47029758 | Tijuana, Mexico | UPS | 1z37wv821305430219 | HASSON | Maryland Residence |
| 3/25/2018 | 300 Tramadol | \$530 | MoneyGram #99457701 | Tijuana, Mexico | UPS | 1z6r0w451397433272 | HASSON | Maryland Residence |
| 5/7/2018 | 300 Tramadol | \$530 | MoneyGram #94267679 | Tijuana, Mexico | UPS | 1zmx26071397991901 | HASSON | Maryland Residence |
| 6/28/2018 | 300 Tramadol | \$530 | MoneyGram #91279653 | Tijuana, Mexico | UPS | 1zmx26075593567702 | HASSON | Maryland Residence |
| 8/14/2018 | 300 Tramadol | \$520 | Western Union #502-856-6777 | Tijuana, Mexico | FedEx | 782339404644 | HASSON | Maryland Residence |
| 10/9/2018 | 300 Tramadol | \$520 | Western Union #087-842-1528 | Tijuana, Mexico | FedEx | 783186750409 | HASSON | Moss Point, Mississippi, Hotel |
| 11/30/2018 | 300 Tramadol | \$520 | Western Union #056-820-2408 | Tijuana, Mexico | FedEx | 784156105470 | HASSON | Maryland Residence |
| 1/8/2019 | 300 Tramadol | \$520 | Western Union #433-323-4761 | Tijuana, Mexico | FedEx | 784882778487 | HASSON | Maryland Residence |
| 2/5/2019 | 300 Tramadol | \$520 | Western Union #189-269-3061 | Tijuana, Mexico | FedEx | 785346724130 | HASSON | Maryland Residence |

18. Another indication that the user of TARGET EMAIL-3 is illegally selling narcotics (and that, in turn, HASSON is illegally purchasing narcotics) is a "disclaimer" sometimes included in emails from TARGET EMAIL-3. In the disclaimer, the user of TARGET EMAIL-3 states, among other things: "*We are not responsible for lost,late,and/or damaged packages*. . . . Safety is number one. We want to continue to service you which is why we enforce security measures. We cannot offer refunds at this time due to the nature of our business. We cannot accept orders under 400\$."

19. Other evidence suggests that **HASSON** is a user, rather than a distributor, of the Tramadol he purchases from the user of TARGET EMAIL-3. According to Navy Federal Credit Union records, **HASSON** made two purchases from "ALTERNATIVE LIFESTYLE": a \$142.76 purchase on July 24, 2018, and a \$97.40 purchase on August 2, 2018. According to emails obtained from TARGET EMAIL-1, the July 24, 2018, purchase was for "Synthetic Urine," "Golden Flask Synthetic Urine," and "The Clean Kit;" and the August 2, 2018, purchase was for "Golden Flask Synthetic Urine" and "The Clean Kit." A search of the Alternative Lifestyle website (www.whizzinatortouch.com) shows that a Golden Flask is a flask filled with four ounces of synthetic urine, as well as a heating pad, presumably to bring the synthetic urine up to body temperature. On the Alternative Lifestyle website, The Clean Kit is described as follows: "The Clean Kit is the first empty refillable kit from ALS. This kit comes with everything you need to discreetly [sic] hide any type of fluids. It comes with an empty vinyl medical grade bag attached to a cotton elastic belt. It has an easy to read temperature strip, a refill port and a hose with two clips attached. You will also receive a medical grade syringe, 2 organic heat pads and a set of instructions. You can choose to put any type of fluid in the bag, just be sure to clean it out after every use."

20. In my training and experience, I know that users of illegal narcotics sometimes attempt to "beat" urinalysis tests by using synthetic urine. Based on the above information, it appears that a user of illegal narcotics could use The Clean Kit in tandem with the Golden Flask and synthetic urine to attempt to avoid a positive urinalysis test. I also know, from information received from the Coast Guard, that as a result of his position, **HASSON** is subject to random urinalysis tests. For example, **HASSON** had a urinalysis test in January 2018, which returned negative for the presence of the types of narcotics for which the test searched.

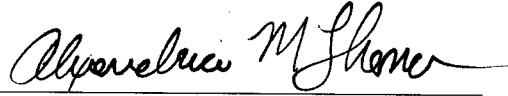
21. Further evidence that **HASSON** is a user of the Tramadol is that, in October 2018, **HASSON** asked the user of TARGET EMAIL-3 to ship 300 Tramadol to a hotel in Mississippi, where **HASSON** was working at the time. According to emails obtained from TARGET EMAIL-1, as well as USAA Federal Savings Bank records, **HASSON** stayed for approximately one month from September 17, 2017, through October 27, 2017, at the particular hotel in Moss Point, Mississippi, to which the Tramadol was shipped.

22. On February 12, 2019, pursuant to a search warrant signed by a military judge, law enforcement agents searched **HASSON**'s desk at work in Washington, D.C. During the search, agents found a bottle labeled "Fish Flox (Ciprofloxacin)," in which agents observed dozens of small pink pills. Pursuant to the warrant, agents seized two of the pink pills, which then were submitted to laboratory analysis. According to the lab results, the pink pills returned positive as Tramadol. In addition, during the search of **HASSON**'s desk, agents observed what appears to be some of the material mentioned above that **HASSON** purchased from Alternative Lifestyles.

23. On February 13, 2019, using video surveillance, law enforcement agents observed **HASSON** remove the "Fish Flox" bottle from his desk drawer, from which he removed several pills that he then cut with a knife. **HASSON** then orally ingested one of the cut pills.

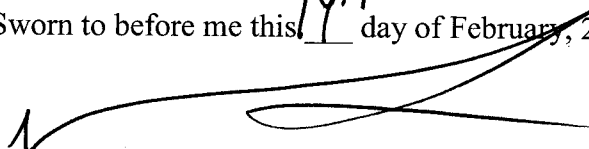
Conclusion

24. Based on the foregoing, I respectfully submit that **HASSON** has committed the TARGET VIOLATIONS and therefore request the issuance of a criminal complaint and arrest warrant.



Alexandria M. Thoman
Special Agent
Federal Bureau of Investigation

Sworn to before me this 14th day of February, 2019.



Honorable Gina L. Simms
United States Magistrate Judge
District of Maryland