

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUITIN AND
FOR BROWARD COUNTY, FLORIDA

AFFIDAVIT IN SUPPORT OF ARREST WARRANTS

FLORIDA STATE STATUTES BEING VIOLATED

- 893.135(1)(c)(3)(a) Trafficking in Oxycodone (Schedule II) more than 7 grams but less than 14 grams
- 893.135 (1)(c)(1)(c) Trafficking in Oxymorphone (Schedule II) more than 28 grams but less than 30 kilograms
- 893.135 (5) Conspiracy to Traffic in Oxycodone (Schedule II)
- 893.135 (5) Conspiracy to Traffic in Oxymorphone (Schedule II)

INTRODUCTION OF AFFIANT

Your Affiant, **Detective Justin Augustus**, is a duly appointed Deputy Sheriff for Broward County and has served in such capacity since August of 2009. Your Affiant is currently assigned as a Detective with the Broward Sheriff's Office, Regional Narcotics Unit, Broward County Drug Task Force, whose primary responsibilities are investigations pertaining to narcotics activity, and any criminal activity related to narcotic investigations. Prior to Your Affiant's current assignment, Your Affiant was assigned to Broward Sheriff's Office, Violence Intervention Proactive Enforcement Response (V.I.P.E.R.) Unit, as well as the Broward Sheriff's Office, Pompano Beach, Crime Suppression Team.

Your Affiant is familiar with the manner and means in which pharmaceutical controlled substance traffickers conduct their business, including methods of obtaining and distributing illicit controlled substances, money laundering, the use of residential telephones, business telephones, cellular telephones, and other communication devices to facilitate their illegal acts; and the use of numerical codes, code words and slang terminologies to develop, promote, and conduct drug transactions. Your Affiant can

attest that individuals obtaining illicit Schedule II, III, IV, and V controlled substances often utilize prescriptions issued to other persons for other than legitimate medical purposes, by doctors acting outside the course of their usual professional practice. In order to conceal their identities and avoid detection by law enforcement, controlled substance traffickers often enlist the aid of compensated confederates' identities, and/or fraudulent or stolen identification documents, to obtain controlled substances.

Your Affiant is familiar with the operation of pharmaceutical drug-trafficking organizations in South Florida. Your Affiant has been working alongside the Drug Enforcement Agency, "DEA" and the Federal Bureau of Investigations, "FBI," to investigate the below case.

BASIS OF KNOWLEDGE / SOURCES OF INFORMATION

Your Affiant makes this affidavit based upon personal knowledge derived from both Your Affiant's participation in, and direction of, the instant investigation, as well as upon information Your Affiant believes to be reliable from the following sources:

- i. Your Affiant's experience investigating drug trafficking organizations, money laundering, and racketeering offenses;
- ii. Oral and written reports about this investigation that Your Affiant has received from members of the Broward County Drug Task Force ("BCDTF"), as well as the United States Drug Enforcement Administration ("DEA") and the Federal Bureau of Investigations ("FBI");
- iii. Discussions your Affiant has personally had concerning this investigation with experienced federal, state, and local law enforcement officers, and other investigators;
- iv. Physical surveillance conducted by BCDTF, DEA and FBI, the results of which have been reported to your Affiant either directly or indirectly;
- v. Information provided by Confidential Human Sources ("CHS");

- vi. Consensual Electronic Intercept / F.S. § 934.07 Authorized Interception of Wire, Oral and/or Electronic Communications
- vii. Review of relevant public and business records, including: official (government) records, public access websites, subpoenaed or court-ordered records, including but not limited to telephone subscriber and toll records, airline travel records, bank records, vehicle records, pharmacy records, and United States Mail records.

Except as otherwise noted, information set forth in this Affidavit has been provided to Your Affiant, directly or indirectly, by other investigators employed by the Federal Bureau of Investigation, Drug Enforcement Administration and the Broward County Sheriff's Office. Unless otherwise noted, wherever in this Affidavit Your Affiant asserts that a statement was made, the information was provided by another law enforcement officer (who may have had either direct or hearsay knowledge of the statement) to whom Your Affiant has spoken or whose report Your Affiant has read and reviewed. Such statements are among many statements made by others and are stated in substance, unless otherwise indicated. Information resulting from surveillance, except where otherwise indicated, does not necessarily set forth Your Affiant's personal observations. Information resulting from surveillance, except where otherwise indicated, has been provided directly or indirectly by other law enforcement officers who conducted such surveillance. Any and all conclusions drawn and/or opinions rendered are based on the totality of the facts and circumstances as Your Affiant knows them, in light of Your Affiant's training and experience.

CONFIDENTIAL HUMAN SOURCES

Throughout this joint FBI-DEA-BSO investigation, the FBI received in depth detailed information regarding the operational structure of this Organization from a FBI Documented Confidential Human Source, (CHS-1). Confidential Human Source 1,

further referred to as “**CHS-1.**”¹ CHS-1 provided information freely and is not being prosecuted or under investigation by law enforcement. CHS-1’s information is believed to be truthful and reliable because it is consistent with other information or verified by other investigative techniques employed during the course of this investigation.

CHS-1 has firsthand knowledge of the practices and procedures of this Organization and advised Your Affiant of how proceeds are moved within the Organization. CHS-1 identified specific members of this Organization including one who was described as the “leader” for this Organization, ALEXANDER GRICHENER. Specifically, CHS-1 stated ALEXANDER GRICHENER maintains the Organization’s records and provide instruction to other members of the Organization. During April of 2018 CHS-1, granted consent for the electronic interception of CHS-1’s personal telephone that CHS-1 used to conduct business with members of the organization. This interception revealed that members of this Organization regularly communicate with the CHS-1 concerning all daily activities. CHS-1 also was given recording devices to secretly record conversations with members of the Organization.

Confidential Human Source 2, further referred to as “**CHS-2.**”² CHS-2 was a Confidential Human Sources for the FBI. CHS-2 provided information freely and is not being prosecuted or under investigation by law enforcement. CHS-2 information is believed to be truthful and reliable because it is consistent with other information or verified by other investigative techniques employed during the course of this investigation.

1 CHS-1 has felony arrests for racketeering from 2003 and was sentenced to 60 months of probation and money laundering from 2013 and was sentenced to 36 months of probation. CHS-1 has additional felony arrests not resulting in convictions: 2000 Promoting prostitution, 2011 Forgery, 2007 Failure to appear. CHS-1 has been a CHS during previous investigations that resulted in the successful arrest and prosecutions of subjects for other agencies, specifically the FBI in NY and HSI. Both cases were successfully prosecuted. The CHS has been paid to work by FBI Philadelphia and FBI Miami.

2 CHS-2 has criminal convictions for D.U.I, in 1992 and C.F.T. access device in 1995, Trespassing in 2004 and Larceny in 2007. CHS-2 also has additional arrests not resulting in convictions for: Forgery in 2000, Disorderly conduct in 2004, Assault Aggravated with a Deadly weapon in 2004, Sex offense against Child-fondling in 2005, Dealing in stolen property in 2008 Fraud make false insurance claim in 2008. CHS-2 has

FACTS ESTABLISHING PROBABLE CAUSE

OVERVIEW OF INVESTIGATION

During the initial debrief of CHS-1 by FBI Special Agent Hester, CHS-1 advised that ALEXANDER GRICHENER, further referred to as "A. GRICHENER" is the leader of a criminal organization that is involved in a large-scale prescription drug diversion operation. The Organization recruits patients to go to specific doctor's offices to obtain prescriptions for controlled substances. Fraudulent prescriptions that have been obtained for the Organization include but are not limited to Oxycodone, Oxymorphone, Hydromorphone, Alprazolam (Xanax), and Promethazine with Codeine. The patients also obtain prescriptions for other non-narcotic medications, which are also turned over to the Organization. The recruited patients use their own personal information for specific doctor's offices and fake alias' for other doctor's offices in order to obtain multiple sets of fraudulent prescriptions.

For the patients with alias', fake Florida driver's licenses are obtained by an associate of . RONALD DIAZ, further referred to as "DIAZ." In addition to providing counterfeit documentation for some patients, DIAZ is also a wholesale drug dealer for the Organization. A. GRICHENER provides DIAZ with the narcotics received from the patient's prescriptions to sell on the street.

ROMAN GRICHENER, further referenced to a "R. GRICHENER," is the adult son of A. GRICHENER. R. GRICHENER occasionally creates counterfeit MRI's to take to the doctor's offices for the Organization's patients. R. GRICHENER also runs his father's organization when A. GRICHENER is out of the County.

Several associates of the Organization, including but not limited to CHS-1 and DIAZ, are also tasked with transporting the patients to and from the doctors' offices and the pharmacies to pick up the medications. One of the doctor offices regularly visited by the Organization members has a conspiring office manager, OLGA ALTERMAN,

been a CHS during previous investigations that resulted in the successful arrest and prosecutions of subjects for other agencies CHS was paid by FBI Miami.

further referred to as "ALTERMAN." The doctor which ALTMERMAN works for is Dr. Douglas Slavin. The office is located at 13499 Biscayne Blvd. in North Miami, Florida. ALTMERMAN is being paid by the organization to assist in acquiring opioid prescriptions for the patients in the organization. Once the patients receive their prescriptions from the doctor, they are taken to various pharmacies to fill the fraudulent prescriptions.

The majority of the pharmacies utilized by the Organization are Publix and Walgreens pharmacies located in Miami Dade County, Broward County and Palm Beach County. The Organization also uses one specific Kmart located at 1401 West Palmetto Park Road in Boca Raton, Florida. The pharmacist at the Kmart pharmacy is VERA ORENSHTEYN, further referred to as "ORENSHTEYN." According to the CHS-1, ORENSHTEYN has knowledge of the Organization's criminal activity and is being paid on the side for her assistance in acquiring the narcotics from Kmart Pharmacy.

Once a prescription is filled by a pharmacy and the medications or narcotics are picked up by the patient or a representative of the Organization. The medications are then taken to A. GRICHENER, who organizes, counts and provides them to DIAZ and ALBERTO ZISMAN, further referred to as "ZISMAN," to sell for the Organization. DIAZ purchases the narcotics from A. GRICHENER for a "wholesale price." For instance, DIAZ purchases oxymorphone from A. GRICHENER for an estimated price of \$17.00 dollars per pill. DIAZ then provides the pills to his associate, WILLIAM WASHINGTON, further referred to as WASHINGTON, who transports and sells the pills in Detroit, Michigan for an estimated \$30.00 per pill. WASHINGTON then returns to Florida with Money Orders from the sales of the drugs in Michigan to be given to A. GRICHENER. The money would then be used to pay members of the Organization or would be deposited into R.GRICHENER's bank account at either Bank of America or Wells Fargo.

The DEA obtained pharmaceutical records from the Kmart pharmacy located at 1401 W Palmetto Park Road in Boca Raton, Florida, along with the Publix pharmacy located adjacent to the Kmart, located at 1339 W Palmetto Park Road in Boca Raton, Florida. Documents show that between January 1, 2018 and October 16, 2018, five

hundred eighty-three (583) prescriptions written by Dr. Douglas Slavin's office in North Miami, Florida for controlled substances were filled at the Kmart where ORENSHTEYN is employed, compared to thirty-one (31) prescriptions from Dr. Douglas Slavin's office at the Publix pharmacy adjacent to Kmart.

Over the course of this investigation, the Organization has used a several locations to runs its business. However, all locations have been within the city limits of Hallandale Beach, in Broward County Florida.

INVESTIGATION TO DATE

Since approximately March 2018, law enforcement has been investigating this Criminal Organization's distribution of mass amounts of controlled substances in South Florida. A. GRICHENER both initiated the Criminal Organization and remains in control of the Criminal Organization. He is responsible for the illegal distribution of Schedule II controlled substances, including Oxycodone, Oxymorphone and Hydromorphone through fraudulently obtained medical prescriptions. CHS-1 began working for A. GRICHENER in approximately March 2017. CHS-1 was originally tasked with finding individuals to open bank accounts at various banks for A. GRICHENER to use to launder money through. Eventually, A. GRICHENER tasked CHS-1 with finding patients willing to obtain prescriptions for opioids at various doctors.

After patients used their personal information at one doctor's office, they were given a second and third identity to use at other doctor offices. CHS-1 was also one of these patients and had multiple identities. These identities were sometimes of real persons or of completely counterfeited identities. Some of real identities being used are of foreign nationals who are acquaintances or associates of A. GRICHENER, but have left the United States to return to Russia. Patients with fake identities are provided counterfeit Florida driver's licenses to knowingly utter at the doctors' offices and pharmacies.

Besides CHS-1, DIAZ and ZISMAN are also considered "patient recruiters." Both DIAZ and ZISMAN have brought various individuals to the organization to be

patients. Patients are transported or met at the doctors' offices by the recruiters. Once a patient received a prescription from the doctor, they would either give it to the recruiter to take to a pharmacy to be filled or take it themselves to be filled. Once the prescription is filled either the patient or the recruiter is contacted by the pharmacy to pick up the medications.

The medications obtained were then given to the recruiter to present to A. GRICHENER at the organization's first office located at 409 Federal Highway, unknown unit number, in Hallandale Beach, Florida, where the narcotics were stored and illegally sold to wholesale buyers. In an attempt to elude and conceal the location of their Organization from law enforcement and unfavorable associates, A. GRICHENER would regularly move their operation location.

In March 2018, when CHS-1 began reporting to law enforcement, at that time the Organization's "office" was located 1001 Federal Highway, Unit 319, in Hallandale Beach, Florida. The office utilized by the Organization was rented under a Limited Liability Corporation in the State of Florida. The corporation, Selez, Inc. was created by the A. GRICHENER in one of the patient's names, Nadezhda Selezneva. CHS-1 was able to provide law enforcement with a list of approximately 65 names of persons that are or have been patients for the Organization. It should be noted that all "patient recruiters" have their own sets of patients that they handle and deal with, thus the list provided to law enforcement is not a complete list of all the parties involved in this Organization.

March of 2018, investigators began conducting surveillance of A. GRICHENER and the co-conspirators in order to corroborate information provided by CHS-1. Both CHS 1 and 2 authorized law enforcement to conduct recordings with various members of the Organization. Most of these conversations were conducted in Russian and were later summarized and translated by a certified FBI linguist.

In March 2018, CHS-1 introduced CHS-2 to DIAZ. DIAZ was looking to purchase a vehicle to use during the sale of his narcotics. On March 28, 2018, CHS-2 conducted a consensual recording with DIAZ. According to the recorded conversation, DIAZ claimed he owned two pharmacies and was able to distribute large amounts of

prescription opioids to customers in northern U.S. cities. DIAZ stated that he had been working with seven (7) Russian individuals for the past eight (8) years. DIAZ advised CHS-2 that he could get CHS-2 Oxycodone, Xanax, Percocet, Morphine and/or Dilaudid.

DIAZ also explained that he had an associate, later confirmed by law enforcement to be WASHINGTON, who DIAZ sends to Detroit, Michigan with “OPANA” (oxymorphone) to sell on the street. DIAZ advised that “OPANA” sells for \$30.00 a pill in Detroit. In April 2018, CHS-2 attempted to buy a large quantity of narcotics from DIAZ, but DIAZ refused to sell to CHS-2.

On May 14, 2018, CHS-1 consented to the Consensual Electronic Intercept/ Authorized Interception of Wire of his cellular phone. Between May 14, 2018 and August 31, 2018, CHS-1’s cellular phone calls and text messages were captured, retained, and reviewed by law enforcement. Due to the renewal of the Consensual Electronic Intercept, there were a few weeks within said time frame that were not captured.

Simultaneously between June 11, 2018 and September 10, 2018, CHS-1 conducted various consensual audio and video recording with the co-conspirators. Law enforcement also conducted various surveillance operations on the members of the Organization during this time frame. However, not every aspect and detail of the recordings obtained and surveillance conducted by law enforcement are included in this affidavit; only relevant information to establish the probable cause is included.

On June 14, 2018, CHS-1 conducted a consensual video recording of the inside of the Organization’s office located at 1001 Federal Highway, office number 319, in Hallandale Beach, Florida. The footage revealed various medical documents to include prescriptions in patient names, a list of patients, checkbooks in various names, cash, prescriptions bottles with various labels and medications. There were also two desks with two desktop computers. CHS-1 has previously observed both A. GRICHENER and R. GRICHENER utilizing those desktop computers to log patient information, track patient doctor appointments, track patient prescription medications pick-ups and drops offs. CHS-1 has witnessed A. GRICHENER on multiple occasions using a Microsoft Excel Spreadsheet to log the information. CHS-1 was not given access to the desktop computers.

(Note: On August 14, 2018, the FBI was able to gain temporary possession of the two desktop computers described above, because R. GRICHENER tasked CHS-1 with destroying them. FBI Agent, Ira Fair, obtained a search warrant for the two desktop computers. Two Microsoft Excel spreadsheets were discovered on one of the computers corroborating CHS-1 observations.)

Later in the day, still on June 14, 2018, CHS-1 was again in the office with A. GRICHENER. A. GRICHENER received a phone call from DIAZ wherein DIAZ reminded A. GRICHENER that WASHINGTON was going to Michigan on Father's Day. A. GRICHENER stated that he only had 120 pills at the moment.

On June 18, 2018, the Authorized Interception of Wire captured twenty three (23) phone conversations between CHS-1 and A. GRICHENER. During one specific call, A. GRICHENER and CHS-1 discussed that CHS-1 had dropped off and received medications for the following patients, Lana Brumistroff, Evgeny Mikhanov, and Nina Syskova. Documentation provided by Publix and Walgreen pharmacies, pursuant to Subpoena, confirmed that all three patients had prescriptions for 120 pills of 30 mg of Oxycodone. Also patient name, Evgeny Mikhanov, was listed as having collected Oxycodone in the Microsoft Excel spreadsheet found on the desktop computer.

On June 19, 2018, CHS-1 conducted a consensually monitored audio video recording with ALTERMAN at Dr. Douglas Slavin's office, located at 13499 Biscayne Boulevard in North Miami Beach, Florida. CHS-1 and ALTERMAN discussed a recent payment she received from CHS-1 the other day. ALTERMAN was having trouble understanding what the payment was for. The two discussed in detail the monetary amounts ALTERMAN received. CHS-1 explained that he gave ALTERMAN \$200.00 for a patient named Emiliano Torres. CHS-1 reminded ALTERMAN that he gave her the \$200.00 separately, not in the envelope like he usually does. ALTERMAN recalled receiving payments of \$250.00, \$250.00, and \$300.00 and asked what they were for. CHS-1 said that it was for a patient named Tatyana Paneleyenko, who came to see ALTERMAN the previous day. CHS-1 stated the \$250 is for the visit and \$50 is for the prescription for Opana.

CHS-1 has previously explained to law enforcement that ALTERMAN is paid between \$200.00 and \$300.00 for each patient she assists the Organization with, at the direction of A. GRICHENER.

Further along in this same recorded footage, ALTERMAN gave CHS-1 the prescriptions for DIAZ's patients, since DIAZ was in Cuba, per travel records. ALTERMAN and CHS-1 also discussed "Dead" patients, meaning that the patient does not physically come into the office to see the Dr. Douglas Slavin for prescriptions for opioids. They speak about the following patients as being "dead ones:" Sevetlana Arsentyeva, Nadezhda Selezneva, Lyudmila Kazan, and Vadim Kislov.

Further investigation revealed that Sevetlana Arsentyeva is an alias used by Elena Babenkova, who had fled to Russia (confirmed via CBP) due to having an active criminal warrant for possession of a counterfeit driver's license; per CHS-1 this case is linked to the Organization's activities. Nadezhda Selezneva and Vadim Kislov are currently in Russia. Lyudmila Kazan resides permanently in Orlando, Florida.

CHS-1 and ALTERMAN finished their meeting by discussing "Smoke." Smoke is a nickname (alias) for Marques Anthony Small, who is an associate of DIAZ. Marques Small was arrested by Your Affiant on June 28, 2018 and charged with Trafficking Hydromorphone, Trafficking Oxycodone, Possession with the Intent to Sell Hydromorphone / Amphetamine / Cocaine / Cannabis, and Distribute / Delivering Cocaine / Hydromorphone / Dilaudid. Marques Small's girlfriend, Aubre Ranson, was also arrested by Your Affiant. At the time of their arrest, Your Affiant found prescriptions in both their names from Dr. Douglas Slavin. A search warrant was also executed at their residence where pill bottles prescribed from Dr. Douglas Slavin were found. Your Affiant also authored a search warrant for Marques Small's cellular phone. Text messages were discovered between Marques Small and DIAZ discussing the sale and purchase of narcotics. (Small and DIAZ use code words when discussing Oxycodone, which was confirmed by CHS-1.)

Also on June 19, 2018, there was an Authorized Interception of Wire conversation between CHS-1 and A. GRICHENER. During the call, A. GRICHENER advised he had already been at Publix to pick up a prescription. Documentation from Publix, pursuant to

a Subpoena, showed that Ievgen Fedorov, one of the organization's patients, had a prescription for 120 pills of 30 mg Oxycodone picked up that same day. Publix also provided store surveillance video, which showed A. GRICHENER picking up the narcotics at the counter.

On July 20, 2019, the FBI and DEA conducted surveillance of A. GRICHENER and R. GRICHENER. A. GRICHENER and R. GRICHENER traveled to the Kmart in Boca Raton, where ORENSHTEYN works as the pharmacist. Both entered, then exited the store within 15 minutes. R. GRICHENER was observed carrying a plastic bag, which he placed in their vehicle's trunk. A. GRICHENER and R. GRICHENER then traveled to the Organization's office located at 1001 North Federal Highway, City of Hallandale, Florida. Documentation from Kmart, pursuant to a Subpoena, showed that on this date eight (8) of the Organization's patients had medications picked up. Six (6) of the patient medications were for Oxymorphone 30 mg, 60 pills, one patient received Oxycodone 30 mg pills, and two other patients received 8 mg of Hydromorphone (Dilaudid), 140 pills and 150 pills each.

On August 7, 2018, CHS-1 conducted audio and video consensually recorded conversations, multiple time throughout the day with both A. GRICHENER and R. GRICHENER, separately. CHS-1 was driving to the office in Hallandale Beach, Florida with A. GRICHENER. While in the car, CHS-1 received a phone call from ZISMAN, during which ZISMAN stated that ZISMAN had dropped off prescriptions for several patients, specifically including one for "Litva," nickname for patient Liudmilla Poskene, at the Kmart in Boca Raton. CHS-1 then received a call from ORENSHTEYN, during which ORENSHTEYN wanted to know by when they need the prescriptions filled because she will not be at work tomorrow (08/08/2018). CHS-1 relayed both the calls with ZISMAN and ORENSHTEYN to A. GRICHENER. A. GRICHENER advised CHS-1 to tell ORENSHTEYN they will pick up the prescriptions on Friday, August 10, 2018.

A. GRICHENER and CHS-1 later arrived at the Organization's office and R. GRICEHRNER was there. The three discussed multiple patients, and at one point R.

GRICHERNER read off a list of 57 patient names from the computer. R. GRICHENER then asked how many pills certain patients were getting. They spoke specifically of "Litva," nickname for patient Liudmilla Poskene, and CHS-1 responded that she received 180 pills. They then discussed picking up the prescriptions from ORENSHTEYN, and R. GRICHENER agreed to pick them up Friday.

On August 9, 2018, FBI and DEA conducted surveillance at the Kmart located at 1401 West Palmetto Park Road in the City of Boca Raton, Florida, where ORENSHTEYN is employed. At approximately 10:31 a.m., ZISMAN entered Kmart through the garden center entrance, which is the closest entrance to the pharmacy. ZISMAN was observed carrying an envelope in his hand and then exited a few minutes later without said envelope. Later that afternoon at approximately 4:10 p.m., DIAZ arrived at Kmart and went to the pharmacy counter. DIAZ was observed speaking with ORENSHTEYN. ORENSHTEYN conducted a transaction at the register and DIAZ paid her with cash. ORENSHTEYN placed multiple white paper bags, consistent with prescription medication packaging, into a white Kmart plastic bag. DIAZ exited Kmart with the plastic bag of medications. Documents later provided by Kmart, pursuant to a Subpoena, showed that on this day the following patient prescriptions were picked up: Liudmilla Poskene, Bella Udell, and Ruben Johenikins. The prescriptions picked up were for 30 mg of Oxycodone, 180 pills and 8 mg of Hydromorphone (Dilaudid), 175 pills.

On August 10, 2018, CHS-1 informed the FBI that R. GRICHENER would be traveling to the Kmart Pharmacy, in order to pick up controlled substances from the pharmacy. CHS-1 stated that after the pickup, R. GRICHENER was planning to take the narcotics to the Knights Inn Motel located at 26 Diplomat Parkway, Unit 2333, in Hallandale Beach, Florida. At this point in the investigation, the Organization had started using this location to store their controlled substances. According to CHS-1, this location began being used in order to try and separate A. GRICHENER from the actual possession of the narcotics, in case law enforcement became aware of their operation.

On August 10, 2018, agents from the FBI and DEA again established surveillance of the Kmart located in the City of Boca Raton, Florida. At approximately 3:47 p.m., R. GRICHENER arrived at the Kmart and entered through the Garden Center entrance. R. GRICHENER went to the pharmacy counter and met with ORENSHTEYN. ORENSHTEYN accepted the money (cash) from R. GRICHENER and completed a sales transaction for what appeared to be prescription medications. R. GRICHENER left the Kmart and then placed the plastic bag in the trunk of his vehicle. R. GRICHENER then traveled to the Knights Inn Motel located in Hallandale Beach, Florida.

Approximately 1 hour later, Your Affiant and members of the DEA witnessed R. GRICHENER retrieve the Kmart plastic bag from within the truck of his vehicle. DIAZ also arrived to the Knights Inn and met R. GRICHENER in the parking lot of the motel. Both were then observed entering room 2333. Documents later provided by Kmart, pursuant to a Subpoena, showed that on this date prescriptions for Luis Hidalgo, Ruben Johenikins, and Rod Frank were picked up. All three patients' medications were for 40 mg of Oxymorphone, 60 pills each (total of 180 pills). Luis Hidalgo also had a prescription for 8mg of Hydromorphone, 150 pills picked up.

On August 11, 2018, CHS-1 informed the FBI that WASHINGTON would be flying to Detroit with a supply of illegal narcotics. Surveillance was conducted at Miami International Airport (MIA) by the FBI. WASHINGTON was observed boarding American Airlines flight 1023 from Miami to Detroit.

At approximately 11:18 p.m., FBI agents in Detroit, Michigan, along with Wayne County Airport Police Officers, observed WASHINGTON remove his luggage from the baggage claim area. Agents and officers made contact with WASHINGTON who acknowledged the luggage was his. WASHINGTON gave permission for all of his property to be examined by a Wayne County Airport Police Officer's K-9 Unit. The K-9 alerted to WASHINGTON's luggage and WASHINGTON allowed them to search his bag.

Officers observed a black nylon bag, shaving style kit, inside the luggage. Inside the nylon bag, officers discovered several prescription containers with various pills.

WASHINGTON stated he does not have the proper prescription bottles for all his medication. Additionally, a bottle of “Spectravite,” and over-the-counter supplement, was located inside the bag. Upon closer examination, it was discovered that what appeared to be the manufacturer’s seal of the bottle had been partially pulled back. Inside the supplement bottle were pills, which did not match the label’s tablets. (Previous reporting by CHS-1, indicated that the organization frequently used over the counter vitamin bottles to transport controlled substances from Miami to Detroit undetected.) WASHINGTON was questioned about the packaging of the pills and stated, “I have nothing more to say.” WASHINGTON was subsequently arrested for improperly transporting medication. Officers inventoried the pills to reveal a total of 1,259 orange colored pills scored “G74”, and 60 additional blue pills scored “M” and “30” were located inside the nylon shaving kit.

On October 17, 2018, Michigan Department of State Police’s Forensic Science Division conducted a forensic analyst of the pills confiscated from WASHINGTON, confirming that orange pills stamped “G74” were Oxymorphone, a schedule II controlled substance, and weighed approximately three-hundred ten and one-half (310.5) grams total. On December 6, 2018, the Michigan Department of State Police’s Forensic Science Division conducted a forensic analyst of the blue pills scored “M” and “30”, confirming they were Oxycodone 30 mg, also a schedule II controlled substance, weighing approximately seven and one-half (7.5) grams total.

On August 13, 2018, WASHINGTON was released and ultimately returned to the Miami area.

On August 13, 2018, CHS-1 relayed that the Organization was getting worried because DIAZ had not heard from WASHINGTON, and rumors on what happened began circulating within the Organization. The following is a summary of a conversation captured by an Authorized Interception of Wire between CHS-1 and DIAZ. DIAZ advised CHS-1 that he received a text stating that WASHINGTON had taken off from Miami and landed at 10:50 p.m. in Detroit. However, when DIAZ attempted to call WASHINGTON there was no answer. DIAZ and CHS-1 further discussed the possibility

that law enforcement arrested WASHINGTON. DIAZ stated that A. GRICHENER told DIAZ to change his phone number to be safe, but DIAZ was concerned because if he changed the phone number WASHINGTON will have no way to contact him.

On August 14, 2018, CHS-1 conducted a consensually recorded audio telephone conversation with A. GRICHENER. A. GRICHENER told CHS-1 that based on the possibility of recent law enforcement activities and fear of detection, the organization should stop activities for a few weeks and see what happens. Later in the day, R. GRICHENER met with CHS-1. The conversation was consensually audio recorded. R. GRICHENER spoke to A. GRICHNER, while in the car with CHS-1. R. GRICHENER told his father, A. GRICHENER, that DIAZ was currently on vacation but stated he was told by DIAZ about what happened to WASHINGTON. R. GRICHENER explained that WASHINGTON told DIAZ that when he landed, he came out of the gate and saw an FBI Agent with a dog. The dog barked and the Agent asked WASHINGTON if he knew why the dog was barking at him. WASHINGTON told the Agent it might be because he had his oxycodone with him. WASHINGTON allowed his bags to be searched and the Agent found his oxycodone, which was not in a pharmacy bottle. WASHINGTON told the Agent that he was planning on moving to Michigan and was collecting the pills for a while. WASHINGTON was given a notice to appear and released. DIAZ then told WASHINGTON that he will get back in touch with him in a few weeks.

CHS-1 informed law enforcement that the Organization decided to change up their common practices, destroy some of their documented material, and change the locations of where they stored their illegal narcotics. CHS-1 was tasked with moving a box of files, destroying the desktop computers, hiding a suit case of non-narcotic medications, and acquiring a storage unit to store items from the organization, which included narcotics. CHS-1 was able to provide the FBI with the material he was tasked with moving and destroying without the organization being aware. All the evidence gathered further corroborated the CHS-1 reporting of activity by the organization. To date, the following material has been gathered by the FBI: two desktop computers

containing spreadsheets of the patients medications and dates of when and where the prescriptions were filled, a file box with various patient personal information, a suit case full of non-narcotic prescription medications in the names of the patients being used by the organization to procure illegal narcotics, and multiple photos of prescriptions and Florida driver's licenses, both real and counterfeit.

On August 15, 2018, CHS-1 conducted a consensually audio video recorded conversation with R. GRICHENER. During the conversation, it was made apparent that despite the issues with law enforcement (the arrest of Marques Small and WASHINGTON) the Organization had no plan to discontinue its illegal activities. R. GRICHENER provided CHS-1 with specific instructions on how they would now be picking up prescriptions. R. GRICHENER tells CHS-1 that prescriptions are to be carried in a bag when walking into the storage unit, dump unspecified items and their labels separately in random places, carry medications right into the storage unit, and only to meet with R.GRICHENER once or twice a day.

At approximately, 1:40 p.m., CHS-1 and R. GRICHENER traveled to the recently rented (by CHS-1) Public Storage, located at 3080 West Pembroke Park Road, Hallandale Beach, Florida, Unit 8008-09. R. GRICHENER showed CHS-1 where he kept the cash and told CHS-1 which bags to use for the drugs. R. GRICHENER and CHS-1 discussed the surveillance cameras at the storage facility and the fact that they should not visit the storage unit more than once a day.

CONCLUSION

Based on the aforementioned factual information, your affiant has probable cause to believe that between March 2018 and August 2018, R. GRICHENER, DIAZ, and WASHINGTON committed violations of the following **Florida State Statues:**

- | | |
|-------------------|---|
| 893.135(5) | Conspiracy to Traffic in Oxycodone |
| 893.135(5) | Conspiracy to Traffic in Oxymorphone |

893.135(1)(c)(3)(a) Trafficking in Oxycodone more than 7 grams but less than 14 grams

893.135 (1)(c)(1)(c) Trafficking in Oxymorphone (Schedule II) more than 28 grams but less than 30 kilograms

Your affiant has probable cause to believe that between March 2018 and August 2018, A. GRICHENER, ALTERMAN, ZISMAN, and ORENSHTEYN committed violations of the following **Florida State Statues:**

893.135(5) Conspiracy to Traffic in Oxycodone

893.135(5) Conspiracy to Traffic in Oxymorphone

WHEREFORE YOUR AFFIANT PRAYS this Honorable Court issue a warrant for the arrest of the following individuals:

ALEXANDER GRICHENER, also known as **Alex Grichener**, White Male, Date of Birth: [REDACTED], Social Security Number: [REDACTED];

ROMAN GRICHENER White Male, Date of Birth: [REDACTED], Social Security Number: [REDACTED];

RONALD DIAZ White Male, Date of Birth: [REDACTED], Social Security Number: [REDACTED];

ALBERTO ZISMAN, White Male, Date of Birth: [REDACTED], Social Security Number: [REDACTED]

OLGA ALTERMAN, White Female, Date of Birth: [REDACTED], Social Security Number: [REDACTED];

VERA ORENSHTEYN White Female, Date of Birth: [REDACTED], Social Security Number: [REDACTED]; and

WILLIAM WASHINGTON Black Male, Date of Birth: [REDACTED], Social Security Number: [REDACTED].

Affiant

**DETECTIVE JUSTIN AUGUSTUS
BROWARD COUNTY SHERIFF'S OFFICE**

JUDGE