

UNITED STATES DISTRICT COURT

for the

District of Colorado

United States of America)

v.)

ALEXIS NICOLE WILKINS)*Defendant*)

Case No. 22-mj-00046-STV

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 December 2, 2021, in the State and District of Colorado, the defendant, ALEXIS NICOLE WILKINS, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, the use of which resulted in the death of Juvenile #1 on or about December 3, 2021.

All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

Code Section

21 U.S.C. § 841(a)(1), (b)(1)(C)

Offense Description

Distribution of Fentanyl, Resulting in Death

This criminal complaint is based on these facts:

See Affidavit attached hereto and herein incorporated by reference.

X Continued on attached sheet.

s/Andrew Cohen*Complainant's signature*Andrew Cohen, Special Agent, FBI*Printed name and title*

Sworn to before me and: ☐ signed in my presence.

☒ submitted, attested to, and acknowledged by reliable electronic means.

Date: March 15, 2022

City and state: Denver, Colorado

*Judge's signature*Hon. Scott T. Varholak, U.S. Magistrate Judge*Printed name and title*

DEFENDANT: Alexis Nicole Wilkins

YOB DEFENDANT: 1995

OFFENSE(S): COUNT 1: 21 U.S.C. § 841(a)(1), (b)(1)(C), Distribution of a Mixture or Substance Containing a Detectable Amount of Fentanyl, a Schedule II Controlled Substance, Resulting in Death

LOCATION OF OFFENSE: El Paso County, Colorado

PENALTY: COUNT 1: NLT 20 years and NMT life imprisonment, NMT \$1,000,000 fine, or both; NLT 3 years and NMT life supervised release; \$100 special assessment fee

AGENT: FBI Special Agent Andrew Cohen

AUTHORIZED BY: Peter McNeilly
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

 X five days or less over five days other

THE GOVERNMENT

 X will seek detention in this case pursuant to 18 U.S.C. § 3142(f)(1) and (2)

The statutory presumption of detention is applicable to this defendant pursuant to 18 U.S.C. § 3142(e)(3)(A).

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Andrew Cohen, Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, deposes and states under penalty of perjury that the following is true to the best of my information, knowledge, and belief.

INTRODUCTION AND AGENT BACKGROUND

1. Your Affiant and other law enforcement officers are involved in an investigation of potential violations of federal law, including violations of Title 21, United States Code, Section 841(a)(1) (Distribution of Fentanyl Resulting in Death, Distribution of Controlled Substances, and Possession of Controlled Substances with Intent to Distribute); Title 21, United States Code, Section 846 (Conspiracy to Distribute Controlled Substances, Including Fentanyl, Resulting in Death); Title 21, United States Code, Section 859 (Distribution of Controlled Substances, Including Fentanyl, to Persons Under Age Twenty-One) (the “Subject Offenses”).

2. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since 2014. I have experience investigating a wide variety of federal criminal violations to include narcotics crimes, violent crimes, and other federal violations. As a Special Agent, I have received training and gained experience in interviewing techniques, arrest procedures, search warrant applications, the execution of search and seizures, narcotics distribution, computer crimes, and various other criminal laws and procedures. As part of my duties, I investigate individuals who have participated in narcotics distribution networks in violation of Title 21, United States Code, Sections 841(a)(1) and 846, among other federal statutes. I have recovered illegal narcotics in other investigations including methamphetamine, heroin, cocaine, MDMA, and fentanyl and I am familiar with drug trafficking methods.

3. The facts in this affidavit come from my personal observations, my training and experience, my review of documents, and information obtained from other agents and witnesses. Particularly, I have relied on information and reports from investigators of the Colorado Springs Police Department (CSPD). This affidavit is intended to show merely that there is probable cause for the requested criminal complaint and arrest warrants and does not set forth all of my knowledge about this matter. Much of this investigation is documented with CSPD Case 21-45313.

4. This investigation has gathered information from interviews, an autopsy report, communications and location data from Facebook, law enforcement and government records, physical surveillance, and the execution of a federal search warrant at Wilkins's residence, all of which will be discussed below. The investigation supports the conclusion that Alexis Nicole Wilkins sold fentanyl in pill form to two juvenile girls, Juvenile #2 and Juvenile #3, on December 2, 2021. On December 3, 2021, Juvenile #2 and Juvenile #3 brought the fentanyl to school and shared it with Juvenile #1, who consumed some of the fentanyl in a bathroom at Mitchell High School in Colorado Springs, Colorado. Juvenile #1 died in class as a result of using the fentanyl.¹

5. I submit probable cause exists to believe, on or about December 2, 2021, in the State and District of Colorado, the defendant, ALEXIS NICOLE WILKINS, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, the use of which resulted in the death of Juvenile #1 on or about December 3, 2021, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

¹ Juvenile #1's, Juvenile #2's, and Juvenile #3's identities are known to me. I have anonymized them in this affidavit because they are juveniles and I anticipate this affidavit will eventually be made public.

PROBABLE CAUSE

Death of Juvenile #1 on December 3, 2021

6. On December 3, 2021, Juvenile #1 (YOB: 2006) appeared to have overdosed during class at Mitchell High School in Colorado Springs, Colorado. At the end of class, a teacher activated emergency medical services after Juvenile #1 was observed foaming at the mouth and unresponsive.

7. Emergency Medical Services (EMS) and the CSPD arrived and initiated life saving measures. Juvenile #1 was transported to a local hospital where she later was declared deceased.

8. The El Paso County Coroner/Medical Examiner's Office performed an autopsy on Juvenile #1. I have reviewed this report and learned the cause of death was "fentanyl intoxication."

Background of Individuals Involved

9. **Alexis Nicole Wilkins**, a/k/a "Lex," a/k/a "Lexii," (DOB: 3/22/1995): Wilkins is suspected to be a fentanyl dealer and ultimately responsible for selling fentanyl to several juvenile girls, which resulted in the death of Juvenile #1 on December 3, 2021. I have reviewed prior Colorado Court Records related to Wilkins and learned the following about her criminal history:

a. In El Paso County (Colorado) Case 21M2941, Wilkins pled guilty to child abuse/negligence, a Class 3 Misdemeanor, on December 8, 2021, and was sentenced to 12 months probation. I believe she is still under this criminal justice sentence.

b. In El Paso County (Colorado) Case 21M5787, Wilkins was sentenced to 12 months probation for theft, a Class 1 Misdemeanor, on April 12, 2019. Her probation was later revoked.

c. In El Paso County (Colorado) Case 16M2553, Wilkins was sentenced to 12 months probation for theft, a Class 3 Misdemeanor, on June 22, 2017.

d. In El Paso County (Colorado) Case 15M7804, Wilkins was sentenced to 12 months probation for theft, a Class 3 Misdemeanor, on April 12, 2016. Her probation was later revoked.

10. **Juvenile #2** (YOB: 2006): Juvenile #2 participated in a drug transaction with Wilkins on or about December 2, 2021, where Juvenile #2 and another juvenile girl, Juvenile #3, purchased one or two pills I believe contained fentanyl from Wilkins. Juvenile #2 was also present with Juvenile #1 on December 3, 2021, when Juvenile #1 consumed some portion of the pill(s) which had been crushed, in a bathroom at Mitchell High School. Juvenile #2 has been cooperative with the FBI and provided multiple interviews, including an audio/video recorded forensic interview on January 14, 2022.

11. **Juvenile #3** (YOB: 2007): Juvenile #3 participated in the drug transaction with Juvenile #2 and Wilkins on or about December 2, 2021, where the juvenile girls purchased one or two pills I believe contained fentanyl from Wilkins. Juvenile #3 was also present with Juvenile #1 on December 3, 2021, when Juvenile #1 consumed some portion of the pills which had been crushed, in a bathroom at Mitchell High School.

Information About Fentanyl

12. Based on prior drug investigations, the FBI and CSPD know fentanyl to be a powerful synthetic opioid which has a very similar effect on the human body to other opiates and opioids.

13. Many illicit fentanyl compounds have been manufactured to mirror the appearance of prescription opioids, specifically the Mallinckrodt Pharmaceuticals 30mg Oxycodone Hydrochloride, which command a much higher price per weight on the illicit market than heroin. Fentanyl pills which are sold under the guise of oxycodone 30mg tablets are blue in color and have imprints which say “M” and “30.” Because of these physical characteristics, they are often referred to by drug users and drug dealers as “blues,” “M30s,” or “30s.” I know some drug users and drug dealers also refer to them as “percs” or “perks.” I believe these nicknames are derived from brand name Percocet oxycodone tablets, however, I believe many drug dealers and drug users use the terms “percs” and “perks” without knowing their origin. Over time, I have started to see drug dealers and drug users actually refer to these round, blue pills with imprints which say “M” and “30” as “fent” or “fentanyl,” an acknowledgment that the controlled substance in these pills is indeed fentanyl and not oxycodone.

14. According to a U.S. Drug Enforcement Administration website², fentanyl is about 100 times more potent than morphine. This relative strength often results in inconsistent dosages when they are not mixed in a compound with the standards of care in the commercial industry. As a result, it is common for fentanyl compounds, when disguised as prescription opioids or other controlled substances such as heroin, to either have significantly more or less of an effect on the human body than a regular dose would be expected to have. According to the same DEA

² Available at <https://www.dea.gov/resources/facts-about-fentanyl> (last accessed on March 8, 2022).

website, 42% of pills tested for fentanyl contained at least 2 mg of fentanyl, which is considered a potentially lethal dose.

15. I have recovered tens of thousands of these round, blue pills bearing the imprints “M” and “30” in the last several years, and have had the opportunity to debrief small, medium, and large dealers of these pills. I have also conducted debriefings with users of these pills. These debriefings, in combination with formal training, contribute to my knowledge of fentanyl, including but not limited to its street, wholesale, and retail values; the different methods of use of fentanyl; its addiction level; and the dangers it poses to those who use it or simply come in contact with it.

Witness Reports on December 3, 2021

16. Members of the CSPD interviewed several juveniles at Mitchell High School on December 3, 2021, and documented the interviews within CSPD Case 21-45313.

17. Juvenile Witness A (YOB: 2007) stated Juvenile #1 uses “percs” and obtained “percs” from Juvenile #3. Juvenile Witness A was not sure where Juvenile #3 purchased the pills.

18. Juvenile Witness B (YOB: 2007) stated Juvenile #1 and Juvenile #3 take Percocet. Juvenile Witness B believed the supplier of Percocet was an older, black female who came to Mitchell High School. Juvenile Witness B believed the supplier’s name was “Lex,” which is consistent with one or more nicknames I am aware of for Alexis Nicole Wilkins.

Statements from Juvenile #3 on December 3, 2021

19. Juvenile #3 gave some statements to the CSPD on December 3, 2021. Several of her statements on December 3 were not consistent with other information obtained in the investigation.

20. Juvenile #3 stated she was in a school bathroom on December 3, 2021, with Juvenile #1 and Juvenile #2. Juvenile #3 stated Juvenile #2 had pressured her to use Percocet in the past, but Juvenile #3 said she did not use any at the school on December 3. She said she heard “snorting” noises coming from a bathroom stall where Juvenile #1 and Juvenile #2 were.

21. Juvenile #3 told the CSPD Juvenile #2 was trying to blame her for Juvenile #1’s death.

Statements from Juvenile #3’s Mother

22. Juvenile #3’s mother gave statements to the CSPD during the course of the investigation several days after Juvenile #1 died. Juvenile #3’s mother told CSPD Officer F. Jacquez Juvenile #3 and Juvenile #2 went to the Citadel Mall the day before Juvenile #1 died.

23. According to Juvenile #3’s mother, Juvenile #3 told her mother that Juvenile #3 and Juvenile #2 met up with “Lexii Nicole” at the Citadel Mall. “Lexii Nicole” was driving a Cadillac Escalade with Colorado Temporary Tag 3465833. I later learned temporary tag 3465833 was registered to Kiwana Allen, 3616 E La Salle St, Apt 304B, Colorado Springs, Colorado. I believe Allen is likely a relative of Wilkins, but the exact nature of the relationship is not entirely clear to me.

24. Juvenile #3's mother also provided Officer F. Jacquez screenshots of a Facebook page and identified Facebook user "Lexii Nicole" as the person Juvenile #3 and Juvenile #2 said they met at the Citadel Mall.

Statements from Juvenile #2 on December 3, 2021

25. Juvenile #2 provided statements to the CSPD on December 3, 2021. She stated Juvenile #3 and Juvenile #1 used Percocet in the bathroom that morning. Juvenile #2 said the Percocet hurt Juvenile #3's stomach and that Juvenile #3 called her mom and subsequently went to the hospital.

26. Juvenile #2 showed a screenshot of a Facebook account bearing the vanity name "Lexii Nicole" to CSPD Officer F. Jacquez and stated that was the woman who sold her pills, but Juvenile #2 claimed the last time she purchased pills was September 24, 2021. Juvenile #2's statement as to the date of the last sale is inconsistent with information Juvenile #2 provided in a later interview on January 14, 2022. Based on Juvenile #2's later statement and other information I have learned during this investigation, I believe Juvenile #2 lied to the CSPD about the date of her last purchase during the interview with CSPD on December 3, 2021.

Forensic Interview of Juvenile #2 on January 14, 2022

27. Juvenile #2 was interviewed by a child forensic interviewer on January 14, 2022, at Safe Passage in Colorado Springs, Colorado. During the interview, Juvenile #2 described some of her history with substance abuse, including methamphetamine, Percocet, cocaine, alcohol, and nicotine products. Juvenile #2 stated she has used hundreds of "percs" and does so by crushing them, then snorting the crushed powder.

28. During the interview, Juvenile #2 stated she had been purchasing alcohol, nicotine, and “percs” from an individual she knew as “Lexi.” Juvenile #2 was introduced to Lexi via a Denver gang member in approximately February of 2021, and she communicated with Lexi primarily via Facebook messenger. Juvenile #2 positively identified a Facebook account with the vanity name “Lexii Nicole” as belonging to Lexi and as the account she used to message Lexi.

29. Prior to being shown a photograph from the profile of the Facebook account, Juvenile #2 described Lexi as a black female, approximately 23 years of age, with long hair and distinct tattoos on her chest. Juvenile #2’s description was consistent with photos openly posted to the Facebook account for “Lexii Nicole,” and Juvenile #2 said the woman in the photo associated with the Facebook account was the same person that sold her Percocet.

30. Juvenile #2 also stated Lexi was associated with the Rolling 60s Crips, a Colorado Springs-based criminal street gang I am familiar with from prior investigations. Juvenile #2 said Lexi was aware of Juvenile #2’s juvenile status, however, Lexi continued to sell Juvenile #2 drugs and alcohol.

31. Juvenile #2 explained Lexi had been selling Percocet to Juvenile #2 for several months, and Juvenile #2 would sometimes act as an intermediary to get drugs or other illegal items from Lexi for Juvenile #2’s friends. Juvenile #2 estimated, in 2021, she had purchased 30 or 40 Percocet pills for a total of several hundred dollars from Lexi. Juvenile #2 estimated the most she ever purchased at one time from Lexi was 12 pills.

32. Juvenile #2 said, on December 2, 2021, she contacted Lexi via Facebook messenger (on the account bearing the name “Lexii Nicole”) on behalf of Juvenile #3 to arrange the purchase of two Percocet for a total of \$40 at the Citadel Mall in Colorado Springs, Colorado.

33. Juvenile #2 stated Lexi met Juvenile #2 and Juvenile #3 at the Citadel Mall and exchanged \$40 for two blue pills. Juvenile #2 noted the pills looked different and were a lighter blue color than normal.

34. Juvenile #2 explained, on December 3, 2021, Juvenile #2, Juvenile #3, and Juvenile #1 met in a girls bathroom at Mitchell High School. Juvenile #2 said the girls ground the pills they got from Lexi, and Juvenile #3 and Juvenile #1 snorted the pills. Juvenile #2 believed Juvenile #1 snorted more than she should have. I am aware video surveillance footage was obtained from Mitchell High School which shows Juvenile #2, Juvenile #3, and Juvenile #1 entering a girls bathroom on the morning of December 3, 2021.

35. Juvenile #2 said, after Juvenile #1 died, Juvenile #2 sent a message to Lexi on Facebook informing Lexi the pills Lexi sold to Juvenile #2 caused her friend to die. Juvenile #2 said Lexi did not respond to Juvenile #2's message.

Review of Information from Wilkins's Facebook Account

36. On January 19, 2022, U.S. Magistrate Judge N. Reid Neureiter authorized a search warrant for the Facebook account of "anallen10234" with a vanity name of "Lexii Nicole." I served that search warrant and Facebook returned a voluminous amount of data which included over 80,000 pages of documents. I have not yet reviewed all the data. I have not included all the information I have learned from my review so far in this affidavit, but I have not intentionally left out any data I believe would be exculpatory in nature to Wilkins or which might tend to cast doubt on the conclusions I have drawn below.

37. I believe Alexis Nicole Wilkins is the user of the Facebook account of "anallen10234" with a vanity name of "Lexii Nicole." In the "About / Contact and Basic Info"

section of the page, the user of the account listed her date of birth as March 22, but did not include a year. Alexis Nicole Wilkins was born on March 22, 1995.

38. The user of the account has posted several profile photos of herself to the account, and I have compared those photos to other known photographs of Alexis Nicole Wilkins, including prior booking photos and the photo from Wilkins's Colorado Driver's License. I specifically compared a profile photo posted to the "Lexii Nicole" Facebook account on October 20, 2021, with Alexis Nicole Wilkins's Colorado Driver's License photo taken on September 2, 2021. These photos are displayed below and contain many similarities, including a unique nose piercing. The person in both photos appears to me to be the same person.



Facebook Profile Photo on 10/20/21



Colorado DL Photo on 9/2/21

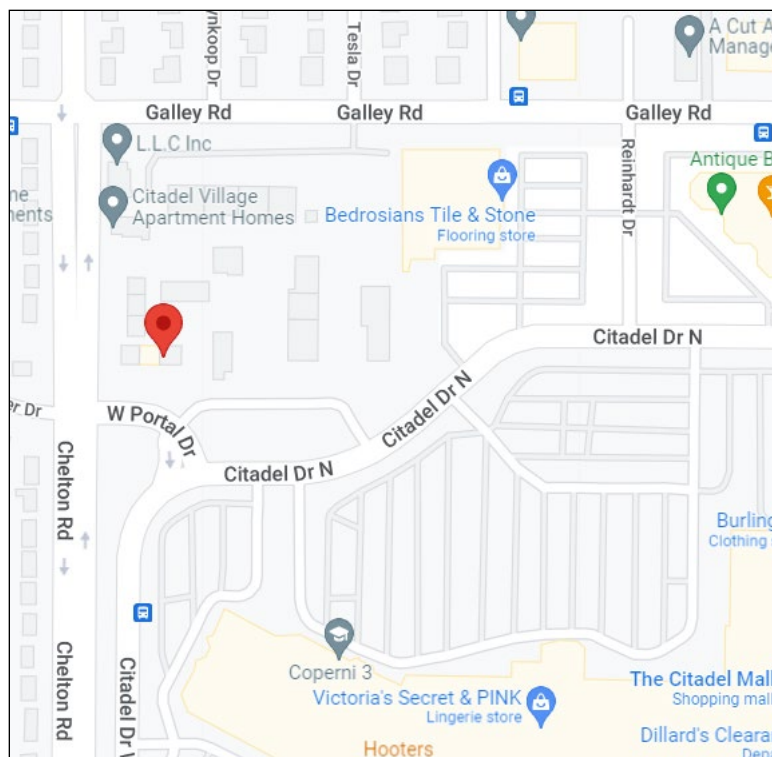
39. I note the Facebook profile photo on the left is the photo Juvenile #2 identified as the woman who sold the juvenile girls pills at the Citadel Mall on or about December 2, 2021.

40. It is also worth noting, in the Facebook profile photo, the woman has a tattoo just below her neck which says “Wilkins.” I believe the image is likely a mirror image, because it appears to have been taken as a selfie photo.

41. The registered email address associated with the “Lexii Nicole” Facebook account is alexiswilkins98@yahoo.com and the account was created on March 14, 2010.

42. Some of the information Facebook provided in response to the warrant was location data associated with the account. I have reviewed this information and found the user’s location data is consistent with someone who lives at the Citadel Village Apartment Homes, which I know to be the apartment complex where Wilkins lives. Regularly, in December of 2021 and January of 2022, Facebook reported the user of the account at the Citadel Village Apartment Homes.

43. For example, and notable because of the events of December 2, 2021, Facebook provided the following location point for the device used to access the Facebook account on December 2, 2021, at approximately 6:12 p.m.: 38.845710754395, -104.76591491699. This coordinate is located within the Citadel Village Apartment Homes. I have plotted this point with a red pin on the map below. The Citadel Village Apartment Homes appear toward the top left corner of the map. The Citadel Mall appears toward the bottom right corner of the map.



A Map Showing a Location Coordinate Near Both the Target Residence and the Citadel Mall on December 2, 2021

44. Using the “Lexii Nicole” Facebook account, Wilkins is a member of several different “groups” on Facebook. I am familiar with “groups” on Facebook, which are often used to communicate with multiple people about a common theme or subject. For example, Facebook groups are often created around sports teams and allow for private discussion between members. Some of Wilkins’s private group memberships are centered around drug distribution.

45. There are hundreds of photographs and posts within Wilkins’s Facebook warrant return that display photographs of illegal drugs, including but not limited to “blues” or “M30” pills, methamphetamine, marijuana, cocaine, and Xanax.

46. This is just one of the photos I found within the data associated with Wilkins’s Facebook account:



*Photo Posted on February 2, 2021, by Another User ("Railsgetdoe Stacks")
to a Facebook Group of which Wilkins Is a Member*

47. Wilkins also had a significant number of private messages with individuals discussing the distribution of illegal drugs. I have not included all of these messages below and have included only a portion of them necessary to support probable cause for the requested warrant. I have also not included every line of the communications within these messages, however, I have not intentionally left out any portion of the conversation I believe would be exculpatory in nature or would materially change the context of the conversation.

48. For example, on or about November 28, 2021, the following conversation occurred between Wilkins's Facebook account and a Facebook user with the vanity name "Tony Hartling":

Date	From	To	Message
11/28/21	Tony	Wilkins	Yo u mobile still lolz
11/28/21	Wilkins	Tony	For how many
11/28/21	Tony	Wilkins	2
11/28/21	Tony	Wilkins	U coming to my crib right?
11/28/21	Wilkins	Tony	Yea I had to go home to grab them I'm otw now
11/28/21	Tony	Wilkins	Ight fs u straight
11/28/21	Wilkins	Tony	Finna pull up Her

49. I submit that, when Tony Hartling said he wanted "2," he was referring to two fentanyl pills. Wilkins told Tony Hartling she "... had to go home to grab them ...". A reasonable interpretation of this statement is that Wilkins has a practice of keeping her supply of fentanyl pills at her home and, in this scenario, she had to go back to her home to get the two pills before taking them to Tony Hartling.

50. Although some time has passed between November 28, 2021, and the date of this affidavit, I further submit the Facebook data shows Wilkins has been engaged in the distribution of fentanyl for many months. For example, the following conversation occurred on or about July 6, 2021, with a Facebook user with the vanity name "Railsgetdoe Stacks":

Date	From	To	Message
7/6/21	Wilkins	Stacks	My fault I had my kids today how much you can lower it if I buy 4 k worth I got a bomb plug for 5.50 but I want stronger ones

7/6/21	Stacks	Wilkins	if you trying to spend that I can put you in the building might even bring it to you My sis got the golden trail all of them you bring that okay now I said s*** I'll put you with a fire deal you dig
7/6/21	Wilkins	Stacks	I get 700 for 3,850 every reeup n na I'ma need that one then you come to me tom I have it ready how many we talking I got 300 left to go I reeup every week if it's great

51. During this conversation, I believe Wilkins was attempting to purchase \$4,000 worth of stronger fentanyl pills. I submit she was informing “Railsgetdoe Stacks” she had a good source of supply who sold her fentanyl pills for \$5.50 per pill when she bought 700 pills at a time, but she wanted stronger pills than she was apparently getting from that source. She represented she was getting a new supply of 700 pills each week when business is good. Of note, “Railsgetdoe Stacks” was the same user who posted the photo of two bags of “M30” pills, which I included above.

52. Another example of Wilkins’s long-term involvement in fentanyl dealing, is the following conversation between Wilkins and a Facebook user with the vanity name “Jordan Gfeller” on or about May 3, 2021:

Date	From	To	Message
5/3/21	Gfeller	Wilkins	U got blues on deck still I'm assuming?
5/3/21	Wilkins	Gfeller	Yea
5/3/21	Gfeller	Wilkins	So if we worked out a deal where if I rip through every time do you think that you could cut me a deal on like a 25 pack to start out on. Just so I can gain your trust because I got my phones nonstop blowing up for these perks and they're willing to pay anywhere between 25 and 35 a piece but I'm trying to make some money to I got to have my next Friday from rent or I'm out

53. I believe Wilkins knew she was selling fentanyl pills, as opposed to a genuine prescription opioid like oxycodone. On or about November 29, 2021, Wilkins had the following conversation with a Facebook user with the vanity name “Jordan Copeland”:

Date	From	To	Message
11/29/21	Copeland	Wilkins	Who needs real blues?
11/29/21	Wilkins	Copeland	Oh I wouldn't know I sell 30s so asking me is like giving away my people lol
11/29/21	Copeland	Wilkins	I feel it I'm just low on bread I didn't know if you still sold them or not my bad ain't trying to step on toes
11/29/21	Wilkins	Copeland	Oh your fine I don't have the real ones tho but better luck in the group chats yanno
11/29/21	Copeland	Wilkins	Do you have 30s? How much for 20
11/29/21	Wilkins	Copeland	13 a p

54. During this message, it appears to me Copeland was attempting to buy or sell actual 30mg oxycodone pills, or “real blues.” Wilkins replied she sells “30s,” and told Copeland “. . . I don't have the real ones” I submit Wilkins knew the pills she was selling contained fentanyl. The date of the conversation is important because Wilkins sold pills to Juvenile #2 and Juvenile #3 on December 2, 2021, which caused Juvenile #1's death on December 3.

55. I also found the following conversation which I believe arranged Wilkins's sale of one or two fentanyl pills to Juvenile #2 and Juvenile #3 at the Citadel Mall on December 2, 2021. I have reviewed content and photos posted by the user of the account which exchanged these communications with Wilkins. Based on the content and photos posted to that account, as well as the nature of these particular messages, I believe Juvenile #2 was the user of that account.

Date	From	To	Message
12/2/21	Juvenile #2	Wilkins	I got 16 I might get the rest buh if I can't I'mma end up being more tm n can pay u that extra 4
12/2/21	Wilkins	Juvenile #2	You able to get to me
12/2/21	Juvenile #2	Wilkins	I'm at the mall I'm riding the bus home
12/2/21	Wilkins	Juvenile #2	Stay at mall
12/2/21	Juvenile #2	Wilkins	U think u can come here
12/2/21	Juvenile #2	Wilkins	Oki Bhet
12/2/21	Wilkins	Juvenile #2	Be there in 5
12/2/21	Juvenile #2	Wilkins	Bhet
12/2/21	Juvenile #2	Wilkins	I got 16 I'mma get more tm to
12/2/21	Wilkins	Juvenile #2	Wya
12/2/21	Juvenile #2	Wilkins	In front
12/2/21	Wilkins	Juvenile #2	Of what ?
12/2/21	Juvenile #2	Wilkins	Food court
12/2/21	Wilkins	Juvenile #2	Ok go to back
12/2/21	Juvenile #2	Wilkins	By where
12/2/21	Wilkins	Juvenile #2	Same place
12/2/21	Wilkins	Juvenile #2	I'm here

56. Based on the interviews with Juvenile #2 and Juvenile #3, as well as the Facebook messages between Wilkins and Juvenile #2 which precede these, I believe Juvenile #2 informed Wilkins she had \$16 and was working to get \$4 more to purchase a fentanyl pill. Wilkins asked if Juvenile #2 could get to Wilkins for the deal, but the two ultimately arranged to do the deal at the Citadel Mall, which is very close to Wilkins's residence in the Citadel Village Apartment Homes. As part of this investigation, I have obtained a bus pass which I believe was how Juvenile #3 got to the mall on December 2, 2021. The time noted on the bus pass seems consistent with the timing of these Facebook messages between Juvenile #2 and Wilkins.

Physical Surveillance of Wilkins's Residence

57. On February 28, 2022, CSPD Detective G. Stilley conducted physical surveillance at Wilkins's residence, 3310 West Portal, Apt 1004, Colorado Springs, Colorado. During that surveillance, he observed Wilkins exit her apartment and enter a silver Jeep Grand Cherokee bearing Colorado temporary permit 3889718. This vehicle registers to Kiwana Allen at 4560 Fountain Springs Grove, Colorado Springs, Colorado. This is the same name of the person the Cadillac Escalade mentioned above registered to, but at a different address.

58. On March 8, 2022, Detective Stilley and other members from CSPD conducted surveillance at Wilkins's residence. At approximately 2:54 p.m., Wilkins left the apartment through the front door and, once again, got into the silver Jeep Grand Cherokee bearing Colorado temporary permit 3889718. Detective Stilley recognized Wilkins from her prior booking photos and was able to positively identify her.

59. Detectives continued to conduct mobile physical surveillance after Wilkins got into the silver Jeep Grand Cherokee. Wilkins made what appeared to be an innocuous stop at a Wal-Mart and then drove to a Subway sandwich shop. Detective Stilley noted Wilkins drove by other Subway sandwich shops to get to this particular one at 1825 North Circle Drive, Colorado Springs, Colorado. Wilkins exited her vehicle and entered the Subway shop.

60. A gray 2019 Nissan Sentra displaying Colorado license plate BUA476 and registered to Brenda Jean Kilbury, 33 University Drive Apt #3, Colorado Springs, Colorado, entered the parking lot and parked directly beside Wilkins's vehicle. The Nissan Sentra was parked on the passenger side of Wilkins's vehicle. The Nissan Sentra appeared to only be occupied by a driver.

61. When the Nissan Sentra arrived, Wilkins came out of the Subway and walked directly to the driver's door of her vehicle. Wilkins got into her vehicle but left the driver's door standing open. At the same time Wilkins exited the Subway, an adult white male got out of the driver's door of the Nissan Sentra. The male walked behind Wilkins's vehicle and directly to her open driver's door. The white male and Wilkins spoke for just a matter of seconds.

62. The white male quickly handed a small, bundled item to Wilkins as Wilkins was handing the white male a small, bundled item. The white male immediately returned to the Nissan Sentra and quickly drove away southbound on North Circle Drive. Wilkins also immediately departed the location in her vehicle.

63. Detective Stilley recognized this interaction as a "hand-to-hand transaction," common in the distribution of illegal drugs. Detective Stilley has witnessed dozens, if not hundreds, of hand-to-hand narcotics transactions between dealers and customers. The exchange which occurred between the white male and Wilkins contained all appearances of being a hand-to-hand narcotics transaction.

Search of Wilkins's Residence on March 15, 2022

64. On March 14, 2022, U.S. Magistrate Judge Michael E. Hegarty authorized a search warrant for the defendant's residence at 3310 West Portal Drive, Apt 1004, Colorado Springs, Colorado. The FBI and CSPD executed the federal search warrant on March 15, 2022.

65. Wilkins was contacted in front of her residence after parking the aforementioned Jeep Grand Cherokee in a parking spot directly in front of the door to apartment 1004.

66. Law enforcement officers recovered evidence relevant to this investigation inside Wilkins's apartment. I am not including all the evidence recovered, but I have not left out any

exculpatory items as it relates to probable cause for the requested criminal complaint and arrest warrant.

67. Officers located and seized over 100 blue pills marked with “M” and “30.” Some of the pills were recovered from Wilkins’s master bedroom and some were recovered from inside her silver Jeep Grand Cherokee. Investigators believe some of the pills were pre-packaged for distribution. Investigators also recovered over \$7,000 of U.S. currency in the apartment.



Photo of Blue Pills and Cash Seized Inside Wilkins's Apartment



Photo of Blue Pills Seized from Wilkins's Jeep Grand Cherokee

Arrest and Interview of Wilkins on March 15, 2022

68. Wilkins was arrested without incident at her residence when the FBI and CSPD executed the search warrant on March 15, 2022. She was transported to the CSPD Police Operations Center (POC).

69. I interviewed Wilkins with CSPD Detective Stilley. The interview was audio and video recorded. Not all Wilkins's statements are included below. Wilkins was read her *Miranda* rights and agreed to speak with investigators without an attorney present.

70. During the interview, Wilkins stated she is unemployed but had been selling fentanyl pills for approximately six months. Wilkins stated the fentanyl pills she sells are referred to as "blues." She claimed she was unsure if all her pills contained just fentanyl, a mix of Percocet and fentanyl, or just Percocet. She said she had just purchased fentanyl from her supplier on March 14, 2022, for approximately \$2,000, and had distributed fentanyl as recent as March 14, 2022.

71. Wilkins stated she meets some of her pill customers at the Citadel Mall, behind the food court.

72. Wilkins said a Facebook user named "Sad Eyes" purchased pills from Wilkins and told Wilkins that one of "Sad Eyes"' friends died from using fentanyl. Wilkins stated she was not the only one that sold fentanyl to "Sad Eyes" and her friends, and Wilkins claimed she did not sell the pills to "Sad Eyes" that killed her friend. Wilkins was shown several photos of "Sad Eyes" from Facebook. Wilkins said she did not recognize all of the photos of "Sad Eyes" which were shown to her, but she did recognize "Sad Eyes" in one of the photos. I know the photo Wilkins recognized was a photo of Juvenile #2.

CONCLUSION

73. Based on the aforementioned factual information, I respectfully submit there is probable cause to believe, on or about December 2, 2021, in the State and District of Colorado, the defendant, ALEXIS NICOLE WILKINS, did knowingly and intentionally distribute a

mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, the use of which resulted in the death of Juvenile #1 on or about December 3, 2021, all in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).


74. Therefore, I respectfully request the issuance of arrest warrants and a criminal complaint charging the same.

I, Andrew Cohen, being duly sworn according to law, depose and say that the facts stated in the foregoing affidavit are true and correct to the best of my knowledge, information and belief.

s/Andrew Cohen

Andrew Cohen
Special Agent, FBI

Submitted, attested to, and acknowledged by reliable electronic means on March 15, 2022.



Hon. Scott T. Warholak
United States Magistrate Judge
District of Colorado

Affidavit reviewed and submitted by Peter McNeilly, Assistant United States Attorney.