

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

UNITED STATES OF AMERICA

v.

DANIEL TAYLOR (1)

No. 5:26-CR-023-H(1)

FACTUAL RESUME

In support of Daniel Taylor’s plea of guilty to the offense in Count One of the superseding information, Taylor, the defendant; Geoffrey Puryear, the defendant’s attorney; and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offense alleged in Count One of the superseding information, charging a violation of 21 U.S.C. § 846, that is, Conspiracy to Distribute and Possess with Intent to Distribute 40 Grams or More of Fentanyl, the government must prove each of the following elements beyond a reasonable doubt:¹

Conspiracy to Distribute and Possess with Intent to Controlled Substances:

- First.* That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute fentanyl;
- Second.* That the defendant knew of the unlawful purpose of the agreement;
- Third.* That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose;

¹ Fifth Circuit Pattern Jury Instructions 2.97 and 2.95A (5th Cir. 2024) (modified to incorporate distribution of a controlled substance. *See United States v. Ambriz*, 727 F.3d 378, 382-84 (5th Cir. 2013)).

Fourth. That the overall scope of the conspiracy involved at least 40 grams of a mixture or substance containing a detectable amount of fentanyl; and

Fifth. That the defendant knew or reasonably should have known that the scope of the conspiracy involved at least 40 grams of a mixture or substance containing a detectable amount of fentanyl.

A “conspiracy” is an agreement between two or more persons to join together to accomplish some unlawful purpose. It is a kind of “partnership in crime” in which each member becomes the agent of every other member.

One may become a member of a conspiracy without knowing all the details of the unlawful scheme or the identities of all the other alleged conspirators. If a defendant understands the unlawful nature of a plan or scheme and knowingly and intentionally joins in that plan or scheme on one occasion, that is sufficient to convict him or her for conspiracy even though the defendant had not participated before and even though the defendant played only a minor part.

The government need not prove that the alleged conspirators entered into any formal agreement, nor that they directly stated between themselves all the details of the scheme. Similarly, the government need not prove that all of the details of the scheme alleged in the indictment were actually agreed upon or carried out, nor must it prove that all of the persons alleged to have been members of the conspiracy were such, or that the alleged conspirators actually succeeded in accomplishing their unlawful objectives.

Mere presence at the scene of an event, even with knowledge that a crime is being committed, or the mere fact that certain persons may have associated with each other and may have assembled together and discussed common aims and interests, does not necessarily establish proof of the existence of a conspiracy. A person who has no knowledge of a conspiracy, but who happens to act in a way that advances some purpose of a conspiracy, does not thereby become a conspirator.

Possession with Intent to Distribute 40 Grams or More of Fentanyl:

First. That the defendant knowingly distributed or possessed a controlled substance;

Second. That the substance was in fact fentanyl;

Third. That the defendant distributed the substance or possessed the substance with the intent to distribute it; and

Fourth. That the quantity of the substance was at least 40 grams of a mixture or substance containing a detectable amount of fentanyl.

To “possess with intent to distribute” simply means to possess with intent to deliver or transfer possession of a controlled substance to another person, with or without any financial interest in the transaction.

STIPULATED FACTS

1. Daniel Taylor, defendant, admits and agrees that from on or about a date unknown and continuing through on or about February 18, 2026, in the Lubbock Division of the Northern District of Texas, and elsewhere, he did knowingly or intentionally combine, conspire, confederate, or agree with persons with the persons named in the indictment and with others known or unknown to commit an offense against the United States, that is, to knowingly or intentionally distribute or possess with intent to distribute 40 grams or more, but less than 400 grams, of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi). All in violation of Title 21, United States Code, Section 846.

2. At all times relevant to this factual resume, Daniel Taylor was employed in good standing as an assistant professor of supply chain management at the Texas Tech University Rawls College of Business in Lubbock, Texas.

3. In June 2025, agents with the Drug Enforcement Administration (DEA) and Caprock High Intensity Drug Trafficking Area (HIDTA) task force began investigating the drug trafficking activities of Daniel Taylor, Marissa Lopez, Alisha Red-Eagle,

Madelyn Gunn, Mackenzie Gilcrease, and others. The agents had received information that a male professor at Texas Tech University, who the reporting party only knew as “Dan,” was distributing fentanyl powder in the Lubbock, Texas area. Agents conducted surveillance at Taylor’s residence on 102nd Street in Lubbock and installed a remote surveillance camera to observe Taylor’s movements.

4. On January 5, 2026, DEA agents along with members of the Caprock High Intensity Drug Trafficking Area (HIDTA) were conducting surveillance on Taylor. Agents watched as Taylor exited his residence with a female, later identified as Marissa Lopez, and followed Taylor and Lopez as Taylor drove them to the Executive Inn at 4401 Avenue Q. At the Executive Inn, Taylor and Lopez picked up a second female, later identified as Alisha Red-Eagle:

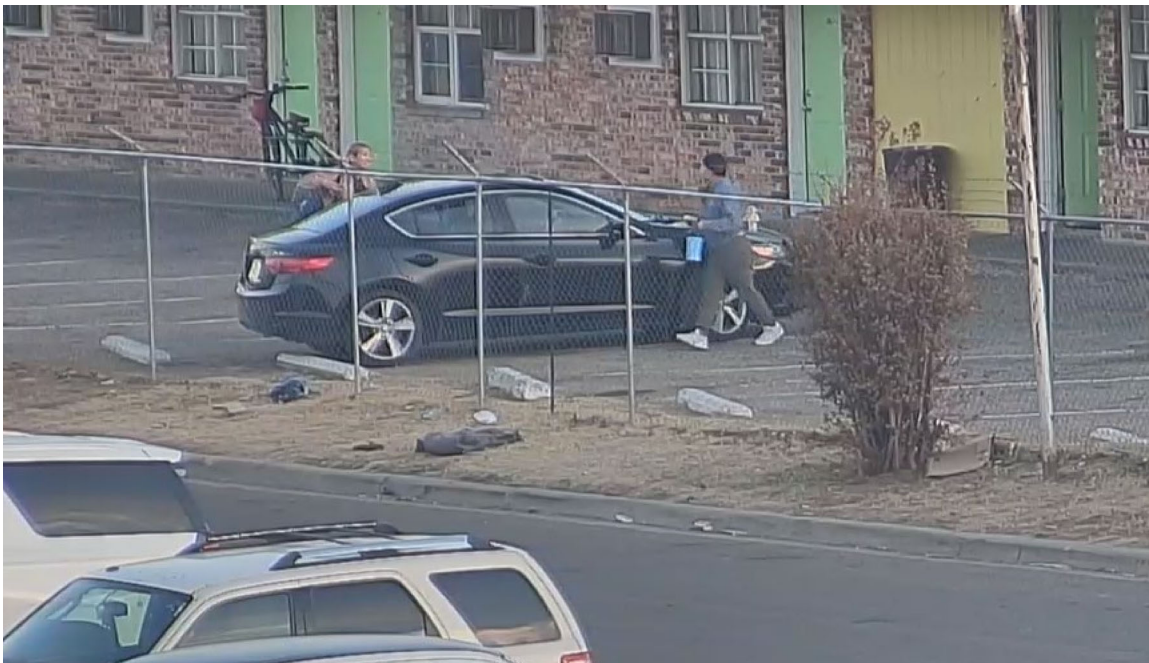


Figure 1 – Red-Eagle (left) and Lopez (right) entering Taylor’s vehicle

5. On January 6, 2026, agents applied for and obtained a court order to place a GPS tracking device on Taylor’s vehicle, a black Acura ILX. Agents covertly attached the device to Taylor’s vehicle on January 7, 2026.

6. On January 12, 2026, agents were conducting surveillance at Taylor’s residence when they observed Taylor exit the home, enter the Acura, and leave. Agents observed Taylor travel to a convenience store off Frankford Avenue in Lubbock. Surveillance video from the store showed Alisha Red-Eagle arriving to the store in a white SUV, parking at the gas pumps, and then entering the store with an unknown male. Shortly thereafter, Taylor arrived in his Acura, parked in front of the store, and entered. Inside the store, Taylor did not acknowledge Red-Eagle, but she observed him while walking past her near the checkout counter:



Figure 2 – Taylor (left) and Red-Eagle (right) inside convenience store

Red-Eagle then followed Taylor outside and the two of them entered Taylor’s Acura. Red-Eagle stayed in the passenger seat of the Acura for less than one minute before exiting the vehicle. Red-Eagle then returned to the white SUV as Taylor left the parking lot and returned to his residence:



Figure 3 – Taylor and Red-Eagle walking towards Taylor’s Acura



Figure 4 –Red-Eagle exiting Taylor’s vehicle and returning to the white SUV

7. Agents, believing they had witnessed a narcotics transaction, decided to conduct a traffic stop on the white SUV as it left the convenience store. A Lubbock County Sheriff's Office (LCSO) deputy in a marked unit pulled the SUV over in the 5400 block of Frankford Avenue. As the deputy approached the vehicle, the occupants began telling the deputy that there was a male in the back seat experiencing a drug overdose. The occupants of the vehicle were identified as Witness-1 (driver), Witness-2 (front passenger), Alisha Red-Eagle (rear driver's-side), and J.D. (rear passenger-side)². J.D. was in physical distress consistent with a drug overdose, and the other occupants stated that they had already administered Narcan³ to J.D.

8. Paramedics arrived and transported J.D. by ambulance to the University Medical Center (UMC) hospital in Lubbock. J.D. required endotracheal intubation and was intubated for approximately three days. J.D.'s treating emergency physician, Dr. S.M., noted the following about J.D.'s condition when he arrived at the hospital:

Due to a high probability of clinically significant, life threatening deterioration, the patient required my highest level of preparedness to intervene emergently and I personally spent this critical care time directly and personally managing the patient...This critical care time was performed to assess and manage the high probability of imminent, life-threatening deterioration that could result in multi-organ failure.⁴

J.D. ultimately survived.

9. As J.D. was transported to the hospital, agents conducted a search of the SUV. Inside Red-Eagle's purse, agents found a clear plastic baggie containing suspected

² The full names of the additional occupants were provided to the defense in discovery.

³ Narcan is a nasal spray designed to rapidly reverse the effects of life-threatening opioid emergencies.

⁴ J.D.'s full medical records from UMC were also provided to the defense in discovery.

fentanyl as well as a pistol magazine. Agents also found foil wrappers with suspected fentanyl residue inside the vehicle, a pink baggie containing a pink powder of suspected fentanyl, and a firearm: a Canik, model TP9SFX, 9-millimeter pistol, serial number 23BC08099. The firearm was found in the pocket behind the driver's seat, near where Red-Eagle was sitting, and was confirmed to have been stolen out of Cameron County. The firearm magazine inside Red-Eagle's purse fit the firearm.

10. Later, while being booked into the Lubbock County Detention Center (LCDC), agents conducted a search of Witness-1 and located a second pink baggie containing a pink powder of suspected fentanyl.

11. The suspected fentanyl powder was sent to the DEA forensic laboratory for analysis. The laboratory results confirmed the powder in the clear baggie inside Red-Eagle's purse to be 0.182 net grams of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propenamide (fentanyl), a Schedule II controlled substance. The two pink plastic baggies were found to contain a total of 0.738 net grams of a combination of fentanyl and 8-Bromo-1-methyl-6-phenyl-4H-[1,2,4]triazolo[4,3-a][1,4] benzodiazepine (bromazolam), which on March 18, 2026, was emergency scheduled by the DEA as a Schedule I controlled substance.⁵

12. Further investigation determined that Red-Eagle reached out to Taylor to obtain fentanyl powder, and that Red-Eagle, Witness-1, Witness-2, and J.D. all began consuming the fentanyl powder, later found in Red-Eagle's purse, right after Red-Eagle

⁵ See <https://www.dea.gov/press-releases/2026/03/18/dea-emergency-schedules-bromazolam> (last accessed June 23, 2026.)

met with Taylor. Agents determined that the white fentanyl powder was being marketed as “ghost,” and the pink fentanyl powder containing bromazoloam was marketed as “flamingo.” Taylor admits and agrees that he distributed both “ghost” and “flamingo” fentanyl powder to Red-Eagle from inside his vehicle at the Frankford Avenue convenience store on January 12, 2026.

13. Following J.D.’s overdose, law enforcement continued their investigation into Taylor. Agents were able to determine that, in September 2025, Red-Eagle had been arrested and transported to LCDC. While Red-Eagle was in LCDC, Taylor created an account through the jail electronic messaging system and used it to put money on Red-Eagle’s jail account. Red-Eagle and Taylor used the account to message each other and arranged for Taylor to pick Red-Eagle up from LCDC upon her release.

14. On February 5, 2026, agents utilized a confidential source (CS) to conduct a controlled purchase of fentanyl powder from Marissa Lopez and Madelyn Gunn. Lopez and Gunn were both believed to be distributing fentanyl powder and being sourced by Taylor. That day, Lopez messaged the CS and instructed the CS to meet her at a parking lot off Marsha Sharp Freeway in Lubbock to complete the deal. The CS was provided with U.S. currency and a recording device and traveled to the meeting location. Agents also traveled to the location and set up surveillance.

15. While conducting surveillance, agents observed a white SUV enter the parking lot and three females, including Gunn and Lopez, exited the vehicle. Agents watched as Gunn placed a plastic baggie inside a red purse and gave the purse to Lopez. Lopez then walked to the CS’s vehicle, where Lopez removed the plastic baggie from the

purse and provided the CS with a small quantity of suspected fentanyl powder in exchange for U.S. currency. During the transaction, the CS inquired about purchasing a gram of fentanyl from Lopez, but Lopez stated that “Dan” told Lopez that she could only sell “per point.” A “point” of fentanyl powder is approximately 1/10th of a gram (0.1 grams).

16. The CS then traveled back to an agreed meeting location and provided the suspected fentanyl powder to agents, who subsequently submitted the substance to the DEA forensic laboratory for testing. DEA laboratory testing confirmed the substance to be 0.169 grams of a combination of fentanyl and bromazoloam.

17. On February 17, 2026, agents were conducting surveillance on Taylor’s 102nd Street residence. That evening, agents observed Taylor arrive at his residence and go inside. A short time later, agents observed a white GMC pickup truck arrive at the residence, and a female, later identified as Mackenzie Gilcrease, walk toward Taylor’s front door. Gilcrease was later seen leaving Taylor’s residence and departing in the GMC pickup.

18. Agents pulled Gilcrease over and requested consent to search her vehicle, which Gilcrease denied. Agents then utilized a drug-sniffing canine unit to conduct a free-air sniff around the vehicle. The canine alerted to the odor of narcotics and agents conducted a search of the vehicle. Inside Gilcrease’s purse, agents found a pink envelope with a pink flamingo sticker. Inside the envelope were three pink plastic baggies containing suspected fentanyl powder. Agents also located a larger clear plastic baggie containing suspected fentanyl powder. The suspected fentanyl powder from the three

pink plastic baggies and larger clear plastic baggie were submitted to the DEA forensic laboratory for testing. DEA laboratory testing confirmed the powder inside the three pink plastic baggies to be a total of 3.02 grams of a combination of fentanyl and bromazoloam. The larger clear plastic baggie was determined to contain 3.64 net grams of fentanyl.

19. Based on the fentanyl found during Gilcrease's traffic stop, agents obtained and executed a search warrant on Taylor's residence. During the search, agents located a station containing a heat-sealer, multiple clear and pink plastic baggies, and nitrile gloves. Next to the station was a handwritten note describing the recipe for "flamingo," which was indicated to be 60% "ghost" fentanyl powder and "8mg bromazoloam per point (appx. 2 Xanax bars).

20. Inside a Pelican case, agents found numerous containers of suspected fentanyl powder, baggies with stickers of scissors on them containing a white powder substance, and three of Taylor's credit/debit cards. Agents also located a pink container with several doses of Narcan. Flamingo-related paraphernalia, including small flamingo stickers, keychains, and pink envelopes identical to the pink envelope inside Gilcrease's purse were found inside the residence. Inside the kitchen, agents found a sign with cartoon flamingos holding cocktails.

21. Photos of all the items described above are included in Figures 5-15 below:



Figure 5 – Station containing heat-sealer, baggies, and gloves

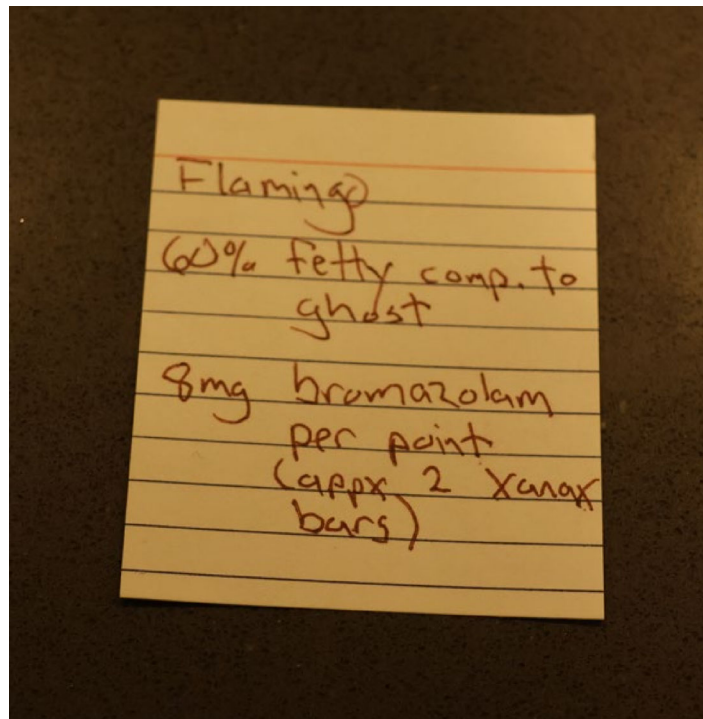


Figure 6 – Recipe for “Flamingo” indicating a combination of fentanyl and bromazoloam



Figure 7 – Contents of Pelican case



Figure 8 – Contents inside bottom of Pelican case



Figure 9 – Pink case containing doses of Narcan



Figure 10 – Baggies containing suspected fentanyl powder



Figure 11 – Flamingo stickers



Figure 12 – Small, pink envelopes



Figures 13 and 14 – Flamingo keychains



Figure 15 – Sign hanging in Taylor’s kitchen area

22. All the suspected fentanyl powder was sent to the DEA forensic laboratory for analysis. Laboratory results confirmed Taylor to be in possession of the following:

- DEA Exhibit 143: 3.02 net grams of fentanyl / bromazoloam;
- DEA Exhibit 132: 0.169 net grams of fentanyl / bromazoloam;
- DEA Exhibit 134.01: 0.06 net grams of cocaine base and fentanyl;
- DEA Exhibit 138: 0.483 net grams of fentanyl;
- DEA Exhibit 139: 0.483 net grams of fentanyl;
- DEA Exhibit 135.01: 0.087 net grams of fentanyl;
- DEA Exhibit 142: 0.357 net grams of methamphetamine hydrochloride;
- DEA Exhibit 140: 1.877 net grams of methamphetamine hydrochloride;
- DEA Exhibit 144: 0.427 net grams of methamphetamine hydrochloride;
- DEA Exhibit 141: 8.55 net grams of ketamine;
- DEA Exhibit 137: 1.265 net grams of 3,4-Methylenedioxymethamphetamine (MDMA).

23. Inside Taylor's home office, agents found Taylor's computer. Displayed on the monitor was a photograph of a young adult female dressed in lingerie and posing on Taylor's bed.

24. Following the search warrant, agents continued to speak with witnesses to determine the full scale of Taylor's fentanyl distribution operation. Law enforcement spoke with several cooperating sources that indicated Taylor was providing fentanyl powder to prostitutes in exchange for sex. Three different cooperating sources (CSs) all independently stated the following: that females would arrange over text messaging applications, including Facebook messenger and Signal, to meet with Taylor at his residence. Upon their arrival, Taylor would have a small quantity of fentanyl powder, and sometimes methamphetamine, out on his kitchen counter. The women would consume the narcotics and would then be directed to shower in Taylor's bathroom, where he would often have a gift basket that included lingerie, a toothbrush, a razor, and perfume. The women would shower and put on the lingerie, and Taylor would often photograph the women in the lingerie before he would have sex with them. Taylor would then provide the women with additional fentanyl powder and they would leave.

25. Confidential Source 1 (CS-1) stated that Taylor would provide her with fentanyl pills and powder in exchange for sex. CS-1 stated that she knew Taylor for approximately 18 months. CS-1 stated that, for approximately one year, she would go to Taylor's residence every other day and have sex with Taylor in exchange for two grams of fentanyl powder. CS-1 would both use and sell the two grams, which CS-1 typically sold for \$100 per point.

26. When CS-1 first started seeing Taylor, Taylor had over an ounce of purple and blue fentanyl powder. Taylor then transitioned to a white-colored fentanyl powder called “ghost,” and that ghost was causing overdoses to almost everyone that used it. CS-1 once overdosed on the ghost fentanyl provided by Taylor and had to be administered Narcan by a friend. CS-1 told Taylor that ghost was causing people to overdose, and that’s when Taylor started mixing ghost with benzodiazepines (bromazoloam) to dilute the product. Taylor would mix the two substances together and add red food coloring, which would turn the powder pink. Taylor chose to call and market the substance as “pink flamingo.”

27. CS-1 stated that, around the fall of 2025, she stopped having sex with Taylor in exchange for fentanyl and instead began purchasing it. CS-1 stated that, for a period of approximately four months, she would purchase four grams of fentanyl powder from Taylor every day for \$100 per gram.

28. Confidential Source 2 (CS-2) stated that she had sex with Taylor in exchange for drugs. CS-2 stated that she was introduced to Taylor by another prostitute, and that CS-2 saw Taylor twice a week for four years. During each of those meetings, Taylor would provide CS-2 with approximately one gram of fentanyl powder and 3.5 grams of methamphetamine in exchange for sex. CS-2 stated that Taylor would also occasionally provide CS-2 with cocaine or ecstasy (MDMA) in exchange for sex. CS-2 stated that she knew Taylor obtained drugs off the dark web but did not know the exact website. CS-2 stated that Taylor had been selling “pink flamingo” for approximately eight months, and that Taylor would put a cartoon pink flamingo sticker on his product.

CS-2 stated that Taylor would conceal narcotics inside different types of snack and candy packaging and would heat-seal the packages to make it look as though the package had never been opened.

29. CD-2 stated that she has twice overdosed on ghost fentanyl powder supplied by Taylor. CD-2 stated that one of these overdoses occurred at Taylor's residence, and Taylor had to administer two doses of Narcan to CD-2 to revive her. CD-2 also stated that she had to administer Narcan to a friend after the friend consumed ghost fentanyl powder Taylor supplied to CS-2.

30. CS-2 stated that she was aware that Taylor was having sex with other prostitutes in exchange for fentanyl, and that Taylor would occasionally send pictures of the other prostitutes in lingerie to CS-2. CS-2 stated that Taylor told her that he began exchanging drugs for sex with prostitutes back when he lived in Ohio and told CS-2 that he learned it was easier to get prostitutes to come back if he paid them with drugs as opposed to money. CS-2 stated that Taylor set up the Signal app⁶ to communicate with her and that Taylor would insist on messaging through Signal due to its encryption abilities. Taylor would routinely instruct CS-2 to delete her messages.

31. Confidential Source 3 (CS-3) stated that she was a fentanyl addict and was told by a friend that Taylor would supply her with fentanyl if she would have sex with him. CS-3 stated that she began seeing Taylor around once a week beginning in April 2025, and that increased to twice a week around September 2025. CS-3 stated that

⁶ Signal is an end-to-end encrypted telecommunication application where users can set to have messages automatically deleted after a couple of minutes of being opened, read or sent.

Taylor would provide her with one gram of ghost, seven-to-eight points (0.7 – 0.8 grams) of pink flamingo, and a half of a gram of methamphetamine each time she would have sex with Taylor. CS-3 stated that sometimes while they had sex, Taylor would ask CS-3 to consume more fentanyl before continuing to have sex with her. Like CS-2, CS-3 stated that Taylor would send CS-3 pictures of the other prostitutes Taylor was also seeing, and that CS-3 was aware Taylor had sent pictures of CS-3 to other prostitutes. CS-3 stated that she felt like Taylor was trying to manipulate all the prostitutes against each other. CS-3 stated that Taylor had a plan to purchase a house for himself and the prostitutes to all live together, and that he called them the “flamingo fam.” CS-3 stated that Taylor would ask the girls to have threesomes in exchange for more drugs, and that CS-3 participated in a threesome with Taylor and another prostitute on one occasion.

32. CS-3 stated that she witnessed fentanyl overdoses of three different individuals after all three consumed ghost fentanyl powder supplied by Taylor. CS-3 stated that all three were revived after being administered Narcan.

33. As part of the February 17, 2026, search warrant, agents seized Taylor’s cell phone and obtained a search warrant for the device. On Taylor’s phone, agents found several photos of CS-1, CS-2, and CS-3 posing in lingerie in Taylor’s home, consistent with their statements to law enforcement. Agents also found messages between Taylor and Taylor’s family member, in which Taylor was sending photos of one of the women to the family member. In the exchange, Taylor referenced all the clothing he was purchasing for the woman and his sexual encounters with her:

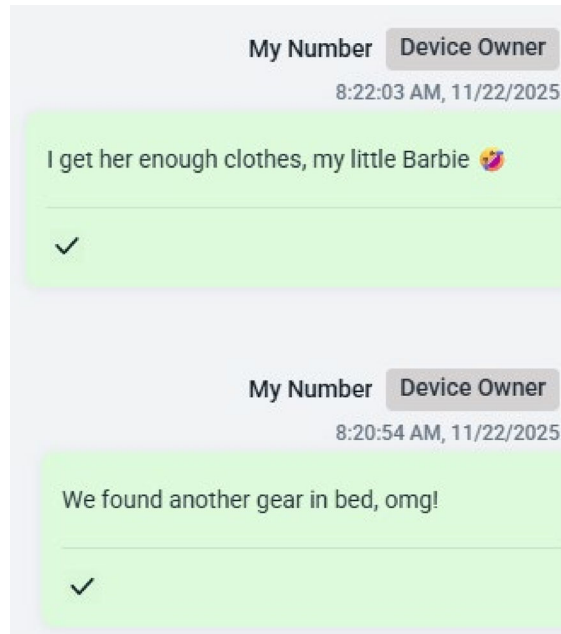


Figure 16

34. Agents also found text messages between Taylor and others discussing his fentanyl distribution. In one message Taylor sent to another individual on October 17, 2025, Taylor referenced his heat-sealing method of concealing the drugs:

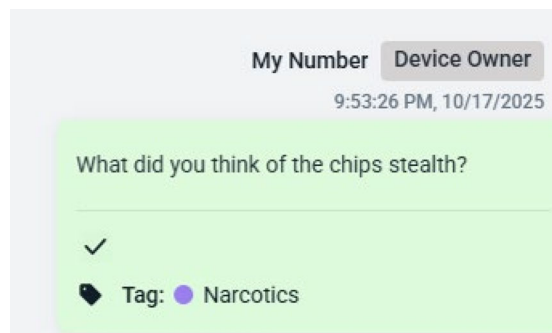


Figure 17

The individual responded, “It was good. I was gonna tell you ‘thank you for the bag of chips.’”

35. In a separate exchange, Taylor referred to the women as his “flamingos:”

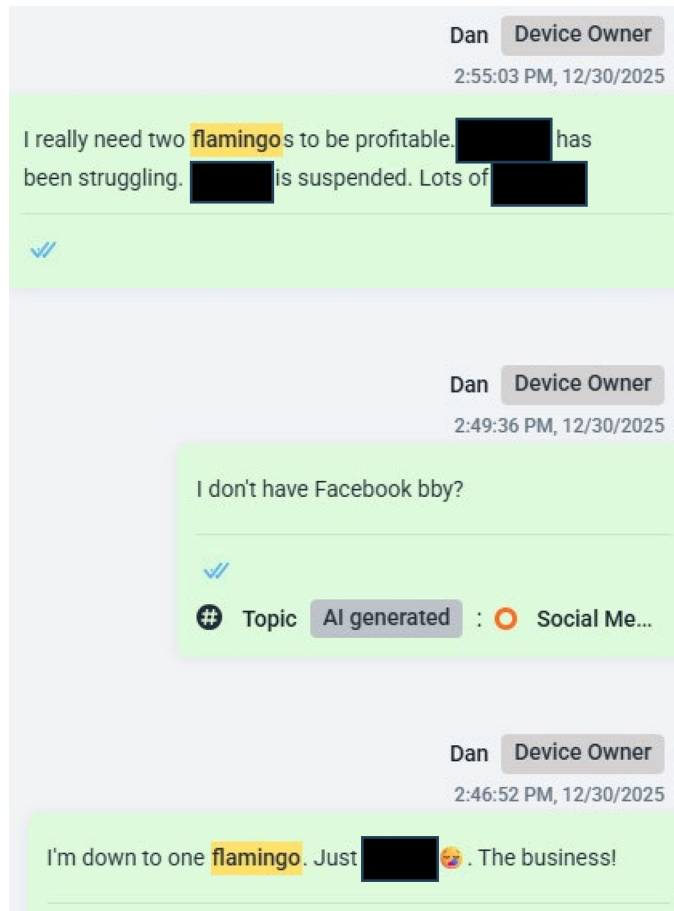


Figure 18

As part of the exchange, Taylor told the other individual that he was “trying a new flamingo to replace [REDACTED].”

36. Agents also seized the phones of Gunn, Gilcrease, Lopez, and Red-Eagle, and obtained legal authority to search all four devices. The devices revealed several messages between Taylor and each of the females discussing the distribution of fentanyl. On several occasions, when the women would mention narcotics, Taylor would instruct them to delete the message thread and move the discussion to the Signal messaging application.

37. In addition to the messages, Gunn’s cell phone contained a video taken in 2025 of an adult male appearing to suffer from a drug overdose. The individual was administered Narcan and survived. During the recording, the camera panned to drugs and drug paraphernalia on a table, including a clear plastic baggie with a flamingo sticker:



Figure 19

38. The defendant agrees that the defendant committed all the essential elements of the offense. Specifically, Taylor admits that he entered into an agreement with Marissa Lopez, Alisha Red-Eagle, Madelyn Gunn, Mackenzie Gilcrease, and others,


including CS-1, CS-2, and CS-3, to distribute and possess with intent to distribute fentanyl. Taylor further admits that part of this agreement included supplying CS-1, CS-2, and CS-3 with ghost and pink flamingo fentanyl powder in exchange for sexual favors. Taylor further admits that he knew of the unlawful purpose of the agreement and joined in the agreement willfully and with the intent to further its unlawful purpose. Taylor further admits that the information provided to law enforcement by CS-1, CS-2, and CS-3 regarding the scale, scope, and purpose of his fentanyl trafficking is credible, reliable, and accurate. Accordingly, Taylor admits that the scope of the conspiracy involved at least 40 grams of fentanyl and that he knew or should have reasonably known that the conspiracy involved at least this quantity.

39. In addition, Taylor admits that his educational background and expertise in supply chain management helped to further or advance his fentanyl distribution network.

40. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count One of the superseding information.

AGREED TO AND STIPULATED on this 24 day of June, 2026.


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