

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of Connecticut

FILED
2013 JUL 24 A 8:10

United States of America
v.
Jason OLIVIERA

Case No.

U.S. DISTRICT COURT
BRIDGEPORT, CONN

3:13 mj 233(wlg)

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of March 1, 2013 to July 23, 2013 in the county of Fairfield in the
 District of Connecticut, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 USC Sec. 846	Conspiracy to Possess with Intent to Distribute Oxycodone

This criminal complaint is based on these facts:

see attached affidavit

Continued on the attached sheet.


Complainant's signature

Dana Mofenson, Special Agent, DEA
Printed name and title

Sworn to before me and signed in my presence.

Date: 7/24/13


Judge's signature

City and state: Bridgeport, CT

Hon. William I. Garfinkel
Printed name and title

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

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STATE OF CONNECTICUT :
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COUNTY OF FAIRFIELD :

ss: Bridgeport, July 24, 2013

U.S. DISTRICT COURT
BRIDGEPORT, CONN

AFFIDAVIT

I, Dana Mofenson, having been duly sworn, do hereby state:

I. INTRODUCTION

1. I am a Special Agent with the Drug Enforcement Administration (“DEA”) and have been so employed since August 2004. Since becoming a Special Agent, I have participated in numerous criminal investigations, including investigations into suspected narcotics trafficking. I am currently assigned to the DEA New Haven Tactical Diversion Squad, which investigates the trafficking of licit pharmaceutical controlled substances. Prior to that, I was assigned for eight years to the DEA High Intensity Drug Trafficking Area (HIDTA) Task Force (hereinafter referred to as “Task Force”), which investigates those drug organizations believed to have the greatest adverse impact on the Bridgeport area. During my assignment to the Task Force, I have prepared numerous affidavits in support of applications for federal search warrants, arrest warrants and pen register authorizations. These affidavits also were prepared in support of the interception of electronic communications. These affidavits and applications have resulted in the conviction of numerous defendants for violations of federal and state narcotics laws.

2. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by law to

conduct investigations and to make arrests for federal felony offenses. I am a participating member of the Task Force, which is comprised of personnel from the Drug Enforcement Administration, Greenwich Police Department, Hamden Police Department, and West Hartford Police Department.

3. This affidavit is submitted in support of a criminal complaint for David WOLVOVSKY and Jason OLIVIERA, who were arrested without a warrant on July 23, 2013, for the charges identified herein. This affidavit is based on my personal knowledge and upon information provided to me by other law enforcement officers and agents. This affidavit is not intended to set forth all of the information that I and other law enforcement personnel have learned during this investigation. Rather, it sets forth only those facts which I believe are necessary and sufficient to establish that probable cause exists to support the criminal complaint to charge WOLVOVSKY and OLIVIERA with conspiracy to possess with intent to distribute oxycodone, in violation of Title 21, United States Code, Section 846.

II. PROBABLE CAUSE

4. David WOLVOVSKY is a Traffic Agent with the Westport Police Department.

5. Jason OLIVIERA runs a boat chartering business, "Jayhova Charters," based in Bridgeport, Connecticut.

6. In mid-July 2013, Homeland Security Investigations ("HIS") received information that a tableting machine had been ordered from China to be delivered to "David WOLVOVSKY at 1023 Hulls Hwy South, Port Fairfield, Connecticut." An internet search of WOLVOVSKY's name revealed a solicitation to purchase oxycodone powder.

7. On July 23, 2013, I made two attempts to contact the residence but received no

answer. Around 2 p.m. I left the package addressed to WOLVOVSKY next to a Chevrolet Tahoe, registered to a business of WOLVOVSKY, that was parked in the driveway. Fellow agents maintained surveillance on the package.

8. Some time later, surveillance observed a Mercedes, which was later learned to belong to OLIVIERA, drive up to WOLVOVSKY's house. WOLVOVSKY and OLIVIERA exited the Mercedes, picked up the package and, together, brought the package to the porch.

9. As DEA and HSI agents approached the porch, OLIVIERA began to move toward his Mercedes.

10. WOLVOVSKY signed a Miranda waiver and a consent to search his house.

11. WOLVOVSKY stated that he had searched the internet during the last few months to purchase oxycodone powder. WOLVOVSKY stated that he purchased the tablet making machine from China through an individual he had met on the internet. WOLVOVSKY had also purchased what he had believed to be a large quantity oxycodone powder from the same individual. WOLVOVSKY stated that OLIVIERA had a buyer in Fairfield County that wanted to purchase 10,000 pills at \$13 per pill. WOLVOVSKY stated that before the tablet making machine had arrived he had tested the oxycodone powder and had determined that it was not true oxycodone powder. OLIVIERA's Fairfield County buyer stated that he/she would be willing to purchase some fake pills to resell.


12. A search of WOLVOVSKY's house revealed a D.H.L. package with over a kilogram of white powder inside. Also found were opiate test kits, packaging materials, tablet dying/imprinting machinery, and currency in a safe, which WOLVOVSKY claimed to be "at least" \$10,000, and suspected cocaine and marijuana residue. Another approximate \$800 in cash

was found in a jacket located in WOLVOVSKY's bedroom.

13. OLIVIERA stated that he knew nothing about any illegal activity. A search of OLIVIERA's left short pocket revealed a zip-lock bag which contained 93 30-milligram oxycodone pills.

III. CONCLUSION

14. On the basis of the foregoing, there is probable cause to believe, and I do believe, that from in or about March 2013 to on or about July 23, 2013, WOLVOVSKY and OLIVIERA, together and with others known and unknown, conspired to possess with intent to distribute oxycodone, in violation of Title 21, United States Code, Section 846.



DANA MOFENSON
SPECIAL AGENT, DEA

Subscribed and Sworn to before me
this 24th day of July, 2013.

/s/ William I. Garfinkel, USMJ

THE HON. WILLIAM I. GARFINKEL
UNITED STATES MAGISTRATE JUDGE